

## **CEQA Findings of Fact and Statement of Overriding Considerations for the Inglewood Basketball and Entertainment Center**

In determining to approve the Inglewood Basketball and Entertainment Center project (“Project”), the City of Inglewood (“City”) City Council makes and adopts the following findings of fact and decisions regarding mitigation measures and alternatives, and adopts the statement of overriding considerations, based on substantial evidence in the whole record of this proceeding and under the California Environmental Quality Act (“CEQA”) (Pub. Resources Code, § 21000 et seq.), particularly Public Resources Code sections 21081 and 21081.5, the State Guidelines for Implementation of CEQA (“CEQA Guidelines”) (14 California Code of Regulations, § 15000 et seq.), particularly sections 15091 through 15093, and City of Inglewood Municipal Code, Chapter 12, Article 28.

This document is organized as follows:

**Section I** provides a description of the Project proposed for adoption, the environmental review process for the Project, the approval actions to be taken, and the location of records;

**Section II** identifies the impacts found not to be significant that do not require mitigation;

**Section III** identifies potentially significant impacts that can be avoided or reduced to less-than-significant levels through mitigation and describes the disposition of the mitigation measures;

**Section IV** identifies significant impacts that cannot be avoided or reduced to less-than-significant levels and describes any applicable mitigation measures as well as the disposition of the mitigation measures;

**Section V** identifies mitigation measures or alternatives set forth in comments on the Draft Environmental Impact Report (“Draft EIR”), and provides information regarding the disposition of these proposals;

**Section VI** evaluates the different Project alternatives and the economic, legal, social, technological, and other considerations that support approval of the Project and the rejection of the alternatives, or elements thereof, analyzed; and

**Section VII** presents a statement of overriding considerations setting forth specific reasons in support of the City’s actions and its rejection of the alternatives not incorporated into the Project.

The Mitigation Monitoring and Reporting Program (“MMRP”) for the mitigation measures that have been proposed for adoption is attached with these findings as Exhibit B. The MMRP is required by PRC section 21081.6, subdivision (a)(1), and CEQA Guidelines sections 15091, subdivision (d), and 15097. Exhibit B provides a table setting forth each mitigation measure listed in the Final Environmental Impact Report for the Project (“Final EIR”) that is required to reduce or avoid a significant adverse impact. Exhibit B also specifies the agency responsible for implementation of each measure. Where the Project Sponsor, Murphy’s Bowl, LLC (“Project Sponsor” or “Project Applicant”), is required to participate in the implementation of a mitigation measure, Exhibit B also states this requirement. Exhibit B also sets

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forth agency monitoring actions and a monitoring schedule for each mitigation measure. Where particular mitigation measures must be adopted and/or implemented by particular responsible agencies such as the County of Los Angeles or one of its departments or commissions, the MMRP identifies the agencies involved and the actions they must take. All of the City’s specific obligations are also described. The full text of each mitigation measure summarized or cited in these findings is set forth in Exhibit B. As explained further in the MMRP, in addition to listing mitigation measures, for the purposes of public disclosure and to assist in implementation and enforcement, the MMRP also lists “project design features” and conditions of approval that have been adopted by and will be monitored by the City pursuant to Assembly Bill 987.

Under CEQA, the City Council has discretion to revise or reject proposed mitigation measures. These findings reflect the mitigation measures as set forth in the EIR. If and to the extent the City Council directs City staff to revise the mitigation measures listed in these findings or in the MMRP, City staff shall immediately revise these documents as necessary to reflect the City Council’s direction.

These findings are based upon substantial evidence in the entire record before the City Council. In these findings the references to certain pages or sections of the Draft or Final EIR, which together constitute the EIR, are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings. A full explanation of the substantial evidence supporting these findings can be found in the EIR, and these findings hereby incorporate by reference the discussion and analyses in those documents supporting the EIR’s determinations regarding the Project’s impacts and mitigation measures designed to address those impacts. References to the Draft EIR or to the EIR are intended as a general reference to information that may be found in either or both the Draft EIR or Final EIR.

## **Section I. Approval of the Project**

### **A. Description of the Project**

As required under CEQA Guidelines section 15124, Chapter 2 of the Draft EIR, Project Description, presents information regarding the respective objectives of the City and the Project Sponsor for the Project, the site where the Project would be located (Project Site), the physical and operational components and characteristics of the Project, and the discretionary approvals from the City and other agencies that would be required for its implementation.

The Project Site is comprised of approximately 28.1 acres of land encompassing four distinct subareas (see Figure S-1 of the Draft EIR):

- *Arena Site*: The approximately 17-acre Arena Site is the central part of the Project Site and is bounded by West Century Boulevard on the north, South Prairie Avenue on the west, South Doty Avenue on the east, and an imaginary straight line extending east from West 103rd Street to South Doty Avenue to the south. The Arena Site includes an approximately 900-foot portion of West 102nd Street;
- *West Parking Garage Site*: The approximately 5-acre West Parking Garage Site is located across South Prairie Avenue from the Arena Site, bounded by West Century Boulevard to the north, hotel

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and residential uses to the west, South Prairie Avenue to the east, and West 102nd Street to the south. The West Parking Garage Site includes an approximately 300-foot portion of West 101st Street;

- *East Transportation and Hotel Site*: The approximately 5-acre East Transportation and Hotel Site is located 650 feet east of the Arena Site and is bounded by West Century Boulevard to the north, industrial and commercial uses to the east and west, and West 102nd Street to the south; and
- *Well Relocation Site*: The approximately 0.7-acre Well Relocation Site is located on the south side of West 102nd Street, approximately 100 feet east of the Arena Site, and is bounded by vacant land to the west and south and residential uses to the east.

All but six of the parcels (approximately 23 acres) that make up the Project Site are currently vacant or undeveloped. The vacant or undeveloped parcels were acquired and cleared by the City between the mid-1980s and the early 2000s with the support of grants issued by the Federal Aviation Administration (FAA) to the City of Inglewood as part of the Noise Control/Land Use Compatibility Program for Los Angeles Airport (LAX).

The six developed parcels, approximately 54,098 square feet (sf) (2.9 acres) all within the Arena Site, include a fast food restaurant (on a privately-owned parcel), a motel (on a privately-owned parcel), a warehouse and light manufacturing facilities (on two privately owned parcels), a commercial catering business (on a privately-owned parcel), and a groundwater well and related facilities (on a City-owned parcel). Another 1.5 acres consists of street segments to be vacated and incorporated into the Project Site.

The Project would develop the following key elements (see Table S-1 and Figure S-2 of the Draft EIR):

- An 18,000-fixed-seat arena (Arena Structure or Arena) suitable for National Basketball Association (NBA) games, with up to 500 additional temporary seats for other sports or entertainment events, comprised of approximately 915,000 sf of space including the main performance and seating bowl, food service and retail space, and concourse areas. The Arena Structure also includes an approximately 85,000 sf team practice and training facility, an approximately 25,000 sf sports medicine clinic, and approximately 71,000 sf of space that would accommodate the Los Angeles (L.A) Clippers team offices

Contiguous to the Arena Structure would be an approximately 650-space parking garage for premium ticket holders, VIPs, and certain team personnel.

The Arena Structure would be a multi-faceted, ellipsoid structure that would rise no higher than 150 feet above ground level. The exterior of the building would be comprised of a grid-like façade and roof that would be highly visible, distinctive, and instantly recognizable due to a design unique in the City and the region, especially at night when it would be accentuated by distinctive lighting and signage. The façade and roof would be comprised of a range of textures and materials, including metal and glass, with integrated solar panels that would reduce event day peak loads.

The Arena Structure would open onto a plaza that would serve as a gathering and pedestrian area for arena attendees. The plaza would include a number of two-story structures that would provide up to 48,000 sf of commercial uses including retail shops, and food and drink establishments, and up to 15,000 sf of flexible community space for educational and youth-oriented uses. The plaza and plaza structures would be directly connected to the West Parking Garage by an elevated pedestrian bridge that would span South Prairie Avenue at an elevation of approximately 17 feet from roadway surface to bottom of the pedestrian bridge.

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- The West Parking Garage Site includes development of a six-story, 3,110-space parking garage with entrances and exits on West Century Boulevard and South Prairie Avenue. The West Parking Garage would include a new publicly accessible access road that would connect West 101st Street and West Century Boulevard on the western property boundary of the West Parking Garage Site.
- The East Transportation and Hotel Site includes development of a three-story structure on the south side of West Century Boulevard, east of the Arena Site. The first level of this structure would serve as a transportation hub, with bus staging for 20 coach/buses, 23 mini buses, and 182 car spaces for Transportation Network Company (TNC) drop-off/pick-up and queuing. The second and third levels of the structure would provide 365 parking spaces for arena and retail visitors and employees. An up to 150-room limited service hotel and associated parking would be developed east of the Parking and Transportation Hub Structure.<sup>1</sup>
- The Arena Site includes the existing Inglewood Water Well #6, which would be removed and replaced with a new Water Well #8 within the Well Relocation Site, a separate parcel further to the east along the south side of West 102nd Street. A City-owned and -operated potable water well would be developed on this site and would replace the City-owned well that currently exists on the Arena Site and would be demolished in order to accommodate the development of the Arena Structure.

It is projected that the Arena would accommodate as many as 243 events each year. Of these events, it is estimated that 62 of them would attract 10,000 or more attendees, and the remainder would be smaller events, with 100 events with attendance of 2,000 or less.

The Project would be designed and constructed to meet the US Green Building Council's Leadership in Energy and Environmental Design (LEED<sup>®</sup>) Gold certification requirements. Some of the sustainable characteristics would be related to the Project Site, and others would be related to the project design and construction methods.

## **B. Project Objectives**

CEQA Guidelines section 15124(b) establishes that the Project Description must include a statement of the objectives to be achieved by the Project. The Project constitutes a Public/Private partnership between Murphy's Bowl LLC and the City as the Project would involve the disposition of property owned by the City of Inglewood and the City of Inglewood as Successor Agency to the City Inglewood Redevelopment Agency, the vacation of portions of City-owned streets, potential condemnation actions to acquire privately owned, non-residential parcels as well as acquisition of public and potential acquisition of privately-owned parcels, by the project applicant for the development of the Project that is designed to maximize the public benefits. The project objectives for the Project include both the stated objectives of the City of Inglewood, as well as the stated objectives of the Project Sponsor, Murphy's Bowl LLC. The following are the City's stated objectives for the Project:

1. Support the revitalization of the City of Inglewood, promote the City as a premiere regional sports and entertainment center recognized at the local, regional, national, and international levels, and

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<sup>1</sup> The East Transportation and Hotel Site could accommodate pick-ups and drop-offs of employees and attendees using private buses, charter buses, microtransit, TNCs, taxis, or other private vehicles. It would not be used as a connection point for public transportation options such as Metro buses.

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support its City of Champions identity by bringing back a National Basketball Association (NBA) franchise to the City.

2. Facilitate a project that promotes the City's objectives related to economic development, and that enhances the general economic health and welfare of the City by encouraging viable development, stimulates new business and economic activity, and increases City revenue (property, sales, admissions and transient occupancy taxes).
3. Expand the opportunities for the City's residents and visitors to participate in a wide range of sporting, cultural, civic and business events.
4. Strengthen the community by providing public and youth-oriented space, outdoor community gathering space, and outdoor plazas.
5. Transform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City.
6. Encourage sustainable, modern, integrated development that includes coordinated traffic event management strategies, encourages public transit opportunities to the Project Site, provides safe and adequate pedestrian circulation, and reflects a high level of architectural design quality and landscape amenities.
7. Create employment and construction-related employment opportunities in the City of Inglewood.
8. Cause the construction (with private funds) of a public assembly and related uses that are geographically desirable and accessible to the general public to host sporting, cultural, business, and community events along with myriad youth- and community- oriented programs.
9. Cause the construction (with private funds) of a project that provides substantial public benefits, including jobs, property and sales taxes, admissions taxes, and transient occupancy taxes.
10. Achieve the objectives described above in an expeditious and environmentally conscious manner.

The following are the project sponsor's stated objectives for the Project:

1. **Build the long-term home of the LA Clippers NBA basketball team.**
  - a. Construct a state-of-the-art multi-purpose basketball and entertainment center with a capacity of up to 18,000 fixed seats to host LA Clippers home games beginning in the 2024–2025 NBA season.
  - b. Locate a basketball and entertainment center on a site that is geographically desirable and accessible to the LA Clippers' current and anticipated fan base.
  - c. Consolidate LA Clippers team operations and facilities in a single location that includes practice facilities, team executive and management offices, a sports medicine clinic, and adequate parking for both events and daily operations.
  - d. Design and develop the basketball and entertainment center to accommodate up to 18,500 attendees for other entertainment, cultural, sporting, business and community events when not in use for LA Clippers home games.
  - e. Create a lively, visitor- and community-serving environment year-round for patrons, employees, community members, and visitors to the surrounding neighborhood and nearby sports and entertainment venues by providing complementary on-site retail, dining, and/or community spaces.

- f. Contribute to the economic and social well-being of the surrounding community by providing public benefits such as opportunities for youth- and community-oriented programs, and increasing revenues generated by property and sales taxes, admissions taxes, and potential transient occupancy taxes.

**2. Develop a financially viable public/private Project that is constructed and operated from private funding sources.**

- a. Locate the Project on a site that can be readily assembled and entitled to enable the feasible development of the Project to host the LA Clippers home basketball games in the 2024–2025 NBA season.
- b. Create a unique visitor experience that is competitive with other new major event venues, including state-of-the-art media, sound, and lighting systems, patron amenities, and other features.
- c. Enhance the future success of the Project by providing signage, naming rights, and sponsorship opportunities to assist in the private financing of the Project.
- d. Support the financial viability of the Project by developing sufficient complementary on-site uses to enhance the productive use of the site on event and non-event days, including retail, dining, and potential hotel uses.

**3. Design a Project that is synergistic with nearby existing and proposed uses and incorporates state-of-the-art urban design and venue design principles.**

- a. Locate the Project on a site near other existing and planned mixed-use development to create a dynamic, year-round sports and entertainment district destination.
- b. Develop the basketball and entertainment center with features that enhance the Project sense of place as a major urban sports and entertainment venue, including gathering spaces, signage, and other amenities.
- c. Create inviting and appropriately scaled pedestrian environments to facilitate the movement of pedestrians and create safe and secure assembly areas for fans and visitors.
- d. Develop the Project to meet high-quality urban design and sustainability standards.
- e. Design the Project to take advantage of existing and planned public transit, and incorporate appropriate vehicular, pedestrian, and bicycle access and amenities that encourage sustainable transportation options.
- f. Increase walkability and improve the pedestrian experience on adjacent public rights of way near the Project Site, and enhance the streetscape appearance by providing perimeter and interior landscaping.

**C. Environmental Review**

**1. Preparation of the Final EIR**

The EIR for the Inglewood Basketball and Entertainment Center (SCH No. 2018021056) was prepared, noticed, published, circulated, reviewed, and completed in full compliance with the California Environmental Quality Act (Pub. Resources Code, § 21000 *et seq.*) (“CEQA”), the CEQA Guidelines (14 California Code of Regulations, § 15000 *et seq.*), and the City of Inglewood Municipal Code, Chapter 12, Article 28, as follows:

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a. A Notice of Preparation of the Draft EIR was filed with the Office of Planning and Research and each responsible and trustee agency and was circulated for public comments from February 20, 2018 through March 22, 2018.

b. A scoping meeting to solicit input on the scope and contents of the Draft EIR was held on March 12, 2018.

c. On December 27, 2019, the City filed a Notice of Completion (NOC) of the Draft EIR with the Governor's Office of Planning and Research (OPR). That same day, the City distributed copies of the Draft EIR to OPR, to public agencies that have jurisdiction by law with respect to the Project, or which exercise authority over resources that may be affected by the Project, and to other interested parties and agencies as required by law.

d. The City established a 45-day public comment period for the Draft EIR. This comment period began on December 27, 2019, and ended on February 10, 2020. The City extended the comment period on three occasions, to and including March 24, 2020. The City accepted and considered comments submitted through this date. Comments submitted after this date have also been included in the record and considered by the City.

e. On December 27, 2019, the City also mailed a Notice of Availability (NOA) of the Draft EIR to all interested groups, organizations, and individuals who had previously requested notice in writing. The NOA stated that the City of Inglewood had completed the Draft EIR and that copies were available at Inglewood City Hall, Economic & Community Development Department Planning Division, One West Manchester Boulevard, Fourth Floor, Inglewood, California 90301; the Inglewood Public Library, 101 West Manchester Boulevard, Inglewood, CA 90301; and Crenshaw Imperial Branch Library, 11141 Crenshaw Boulevard, Inglewood, CA 90303. The comments of such groups, organizations, and individuals were sought through February 10, 2020. As noted above, the City issued revised NOAs extending the comment period to and including March 24, 2020. The original NOA and all revised NOAs were posted on the City's website and emailed to OPR.

f. A public notice was placed in the Los Angeles Times on December 27, 2019 and Inglewood Today on January 2, 2020, which stated that the Draft EIR was available for public review and comment.

g. A public notice was posted in the office of the Los Angeles County Clerk on December 27, 2019. The City extended the Draft EIR comment period on three occasions, posting additional notices regarding such extensions. Ultimately, the comment period was extended through March 24, 2020.

h. On June 3, 2020, the City released the Final EIR for the Project. The Final EIR included (i) comments on the Draft EIR submitted during the comment period, (ii) responses to those comments, (iii) staff-initiated revisions to the text of the Draft EIR, together with an explanation of why those changes were made, and (iv) a draft of the MMRP. The City sent notice to those submitting comments

and to other interested agencies and individuals that the Final EIR had been released, stating that the Final EIR had been posted and was available for review on the City's web site, and that the Final EIR included responses to comments received on the Draft EIR.

i. The City made documents available to the public in a readily accessible electronic format, including the Draft EIR, all documents submitted to or relied on in the preparation of the Draft EIR, comments and the Final EIR, as required by Public Resources Code section 21168.6.8(g). Documents were posted in a timely manner on the City's Economic and Community Development Department EIR web page at <https://www.cityofinglewood.org/1036/Murphys-Bowl-Proposed-NBA-Arena> and [www.ibecproject.com](http://www.ibecproject.com).

j. In certifying the EIR, the City Council finds that the Final EIR and its appendices do not add significant new information to the Draft EIR that would require recirculation of the EIR pursuant to CEQA Guidelines section 15088.5 because the Final EIR and its appendices contain no information revealing (1) any new significant environmental impact that would result from the Project (including the variant to the project proposed for adoption) or from a new or revised mitigation measure proposed to be implemented, (2) any substantial increase in the severity of a previously identified environmental impact unless mitigation measures are adopted that would reduce the impact, (3) any feasible project alternative or mitigation measures considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Project but that was rejected by the Project Applicant, or (4) that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

k. The City Council has placed the highest priority on feasible measures that will reduce greenhouse gas emissions on the arena site and in the neighboring communities of the arena. Mitigation measures have been considered and implemented, to the extent feasible and necessary.

## 2. Recirculation

Under section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not "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. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

- (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.

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- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(CEQA Guidelines, § 15088.5, subd. (a).)

Recirculation is not required where the new information added in the Final EIR merely clarifies or amplifies or makes insignificant modifications in an adequate Draft EIR. The above standard is “not intend[ed] to promote endless rounds of revision and recirculation of EIRs.” (*Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1132 (*Laurel Heights*)). “Recirculation was intended to be an exception, rather than the general rule.” (*Ibid.*)

The City recognizes that minor changes have been made to the Project and additional evidence has been developed after publication of the Draft EIR. The refinements to the project are described in Chapter 2 of the Final EIR. As described in the Final EIR, these refinements would result either in no changes to the impact conclusions or in a reduction in the severity of the impact presented in the Draft EIR. In addition, minor refinements that have occurred after the publication of the Final EIR will not result in new or substantially more severe significant impacts.

Finally, the Final EIR includes supplemental data and information that was developed after publication of the Draft EIR to further support the information presented in the Draft EIR. None of this supplemental information affects the conclusions or results in substantive changes to the information presented in the Draft EIR or to the significance of impacts as disclosed in the Draft EIR.

CEQA case law emphasizes that “[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.” (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736-737; see also *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11.) “CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.” [Citation.] In short, a project must be open for public discussion and subject to agency modification during the CEQA process.” (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936.) Similarly, additional studies included in a Final EIR that result in minor modifications or additions to analysis concerning significant impacts disclosed in a Draft EIR does not constitute “significant new information” requiring recirculation of an EIR. (See *Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012) 210 Cal.App.4th 184, 221 [incorporation of technical studies in a Final EIR disclosing additional locations affected by a significant noise impact identified in the Draft EIR did not require recirculation].) Here, the changes made to the

Project and the additional evidence relied on in the Final EIR are the kind of information and revisions that the case law recognizes as legitimate and proper and does not trigger the need to recirculate the Draft EIR.

The City Council finds that none of the changes and revisions in the Final EIR substantially affect the analyses or conclusions presented in the Draft EIR, and do not constitute significant new information; therefore, recirculation of the Draft EIR for additional public comments is not required.

**D. AB 987**

AB 987 was signed by Governor Jerry Brown on September 30, 2018. The bill added section 21168.6.8 to CEQA (Pub. Resources Code, § 21168.6.8) and provides for expedited judicial review in the event that the certification of this EIR or the granting of project approvals are challenged, so long as certain requirements are met. The provisions of CEQA section 21168.6.8 are similar to the provisions of the Jobs and Economic Improvement through Environmental Leadership Act of 2011 (AB 900, Pub. Resources Code, §§ 21178 through 21189.3), which established expedited judicial review of certified Environmental Leadership Development Projects. In order to qualify for expedited judicial review under AB 987, the Project must implement a transportation demand management program that will achieve a 15 percent reduction in vehicle trips, and must not result in any net additional greenhouse gas emissions. Additionally, as a condition of approval of the Project, the City must require the Project Sponsor to implement measures that will achieve reductions of specified amounts of certain criteria pollutants and toxic air contaminants.<sup>2</sup> The Governor has certified the project as complying with the provisions of AB 987.

The Project must:

- A. Receive Leadership in Energy and Environmental Design (LEED) gold certification for new construction within one year of the completion of the first NBA season.
- B. Implement trip reduction measures including the following:
  - i. Implementation of a transportation demand management plan that, upon full implementation, will achieve and maintain a 15 percent reduction in the number of vehicle trips, collectively, by attendees, employees, visitors, and customers as compared to operations absent the transportation demand management program;
  - ii. To accelerate and maximize vehicle trip reduction, each measure in the transportation demand management program shall be implemented as soon as feasible, so that no less than a 7.5 percent reduction in vehicle trips is achieved and maintained by the end of the first NBA season during which an NBA team has played at the arena;
  - iii. A 15 percent reduction in vehicle trips shall be achieved and maintained as soon as feasible, but not later than January 1, 2030. The applicant shall verify achievement to the lead agency and the Office of Planning and Research; and

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<sup>2</sup> Office of the Governor, 2018. Assembly Bill 987 Signing Message. September 30. A copy of Public Resources Code section 21168.6.8 is contained in Appendix N of the Draft EIR.

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- iv. If the applicant fails to verify achievement of the reduction required by clause (iii), the lead agency shall impose additional feasible measures to reduce vehicle trips by 17 percent, or, if there is a rail transit line with a stop within one-quarter mile of the arena, 20 percent, by January 1, 2035.
- C. Be located on an infill site.
  - D. Be consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of section 65080 of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.

AB 987 also requires that the Governor certify that the following conditions are met in order for the Project to qualify for expedited judicial review:

- (1) The Project will result in a minimum investment of one hundred million dollars (\$100,000,000) in California upon completion of construction.
- (2) The Project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, employs a skilled and trained workforce, as defined in subdivision (d) of Section 2601 of the Public Contract Code, provides construction jobs and permanent jobs for Californians, and helps reduce unemployment.
- (3) Compliance with AB 987 would require the Project to result in no net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation, as determined by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code. Not less than 50 percent of the greenhouse gas emissions reductions necessary to achieve this requirement must be from local, direct greenhouse gas emissions reduction measures, and the project applicant may obtain offset credits for up to 50 percent of the greenhouse gas emissions reductions necessary to achieve it.
- (4) The Project Sponsor demonstrates compliance with the solid waste and recycling requirements of Chapters 12.8 (commencing with Section 42649) and 12.9 (commencing with Section 42649.8) of Part 3 of Division 30, as applicable.
- (5) The Project Sponsor has entered into a binding and enforceable agreement that all mitigation measures required pursuant to CEQA and any other environmental measures required by AB 987 to certify the Project under AB 987 shall be conditions of approval of the Project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency.
- (6) The Project Sponsor agrees to pay any additional costs incurred by the courts in hearing and deciding any case subject to AB 987.
- (7) The Project Sponsor agrees to pay the costs of preparing the record of proceedings for the Project concurrent with review and consideration of the Project pursuant to CEQA.

AB 987 also requires that, as a condition of approval of the Project, the lead agency shall require the Project Sponsor, in consultation with the South Coast Air Quality Management District, to implement measures that will achieve criteria pollutant and toxic air contaminant reductions over and above any emission reductions required by other laws or regulations in communities surrounding the project. At a minimum, these measures must achieve reductions of a minimum of 400 tons of NOx and 10 tons of PM2.5 over the 10 years following the commencement of construction of the Project. Of these amounts, a

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minimum of 130 tons of NO<sub>x</sub> and 3 tons of PM<sub>2.5</sub> would be achieved within the first year following commencement of construction of the Project. If the project applicant can demonstrate and verify to the South Coast Air Quality Management District that it has invested at least thirty million dollars (\$30,000,000) to achieve the requirements of this subdivision, the requirements of this subdivision shall be deemed met, so long as one-half of the reductions described above are met. Greenhouse gas emissions reductions achieved through these NO<sub>x</sub> and PM<sub>2.5</sub> reduction measures shall count toward the applicant's obligations to achieve 50 percent of the greenhouse gas reductions through local, direct greenhouse gas reduction measures.

In accordance with Public Resources Code section 21168.6.8(g), the City prepared the record of proceedings concurrently with the preparation of the Draft EIR, and made the Draft EIR and all other documents submitted to or relied upon by the City in preparing the Draft EIR readily accessible in electronic format on the date of release of the Draft EIR. These documents, together with other documents that comprise the record of proceedings, were also posted to and accessible at the web site established for the project record ([www.IBECProject.com](http://www.IBECProject.com)). A copy of Public Resources Code section 21168.6.8 is contained in Appendix N of the Draft EIR.

The City will comply with section 21168.6.8 by certifying the record of proceedings within five days of filing a Notice of Determination.

#### **E. Approval Actions**

Implementation of the Project requires, but may not be limited to, the following actions by the City of Inglewood:

- Certification of the EIR to determine that the EIR was completed in compliance with the requirements of CEQA, that the decision-making body has reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the City of Inglewood.
- Adoption of a Mitigation Monitoring and Reporting Program, which specifies the methods for monitoring mitigation measures required to eliminate or reduce the Project's significant effects on the environment.
- Adoption of CEQA findings of fact, and for any environmental impacts determined to be significant and unavoidable, a Statement of Overriding Considerations.
- Approval of amendments to the General Plan's Land Use, 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 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.

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- Approval of a Specific Plan Amendment to the Inglewood International Business Park Specific Plan to exclude properties within the Project Site from the Specific Plan Area.
- Approval of amendments to Chapter 12 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, parking and loading, public art, 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 the vacation of portions of West 101st Street and West 102nd Street, and adoption of findings in connection with that approval.
- Approval 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 Disposition and Development Agreement (DDA) by the City of Inglewood governing terms of disposition and development of property.
- Approval of a Development Agreement (DA) addressing community benefits and vesting entitlements for the Proposed Project.
- 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) in compliance with the Subdivision Map Act and Article 22 of the Inglewood Municipal Code (IMC).
- Approval of conditions of approval deemed necessary and appropriate by the City.
- 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.

Additionally, if the project applicant is unable to acquire privately-owned, non-residential parcels within the Project Site, the City, in its sole discretion, may consider the use of eminent domain to acquire any such parcels, subject to applicable law.

In addition to approvals by the City of Inglewood, approvals or actions by other agencies or entities would include, but not be limited to, the following:

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- Determination of consistency with the LAX Airport Land Use Plan by the Los Angeles County Airport Land Use Commission.
- Issuance of permits to allow for municipal water well relocation by the Los Angeles County Department of Public Health.
- Review of the Proposed Project by the FAA under 14 Code of Federal Regulations Part 77 for issuance of a Determination of No Hazard.

Additional approvals or permits may also be required from federal, State, regional, or local agencies, including but not limited to the following:

- Los Angeles Regional Water Quality Control Board;
- South Coast Air Quality Management District;
- Los Angeles County Fire Department;
- Los Angeles County Metro; and
- California Department of Transportation.

#### **F. Contents and Location of Record**

The record upon which all findings and determinations related to the Project consists of those items listed in Public Resources Code section 21167.6 subdivision (e), including but not limited to the following documents, which are incorporated by reference and made part of the record supporting these findings:

- The City of Inglewood General Plan and all Elements thereto, as amended from time to time through the date of approval of the Project;
- City of Inglewood Municipal Code.
- The NOP and all other public notices issued by the City in conjunction with the Project.
- The Draft EIR and all documents referenced in or relied upon by the Final EIR. (The references in these findings to the Final EIR include the Draft EIR, the RTC, and the Initial Study.)
- The MMRP for the Project.
- All findings and resolutions adopted by the City in connection with the Project, and all documents cited or referred to therein.
- All information including written evidence and testimony provided by City staff to the City Council relating to the EIR, the Project, and the alternatives set forth in the EIR or these CEQA findings.
- All records of decision, staff reports, memoranda, maps, exhibits, letters, synopses of meetings, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project.

**Comment [U1]:** Although this already "is not limited to" please specifically reference the link to the overall administrative record

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- All information provided by the public, including written correspondence received by City staff during the public comment period of the Draft EIR.
- All testimony presented to the Planning Commission or City Council.
- All information presented at workshops or hearings held by the City for the Project.
- All documents related to AB 987, including the record of the project applicant's submittals to the Governor pursuant to AB 987, including the California Air Resources Board's determination concerning, and the Governor's certification of, the Project.
- All information and documents included on the website prepared for the Project pursuant to AB 987, which are available at the following link: <http://www.ibecproject.com/> or at <https://www.cityofinglewood.org/1036/Murphys-Bowl-Proposed-NBA-Arena>.

The City Council has relied on all of the documents listed above in reaching its decision on the Project, even if not every document was formally presented to the Council. Without exception, any documents set forth above not found in the Project files fall into one of two categories. In the first category, many of the documents reflect prior planning or legislative decisions of which the City Council was familiar with when approving the Project. (See *City of Santa Cruz v. Local Agency Formation Com.* (1978) 76 Cal.App.3d 381, 391-392; *Dominey v. Dept. of Personnel Admin.* (1988) 205 Cal.App.3d 729, 738, fn. 6.) In the second category, documents that influenced the expert advice provided to City staff or consultants, who then provided advice to the City Council as final decision makers, form part of the underlying factual basis for the City Council's decisions relating to approval of the Project and properly constitute part of the administrative record. (See Pub. Resources Code, § 21167.6, subd. (e)(10); *Browning-Ferris Industries v. City Council of City of San Jose* (1986) 181 Cal.App.3d 852, 866; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 153, 155.)

The public hearing transcript, a copy of all letters regarding the Draft EIR received during the public review period, the administrative record, and background documentation for the Final EIR, as well as additional materials concerning approval of the Project and adoption of these findings are contained in the Project files. Project files are available by contacting Mindy Wilcox, Planning Manager, at the Inglewood City Hall, Economic & Community Development Department Planning Division, One West Manchester Boulevard, Fourth Floor, Inglewood, California 90301. All files have been available to the City Council and the public for review in considering these findings and whether to approve the Project.

## **G. Findings Required Under CEQA**

### **1. Findings**

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environment impacts that would otherwise occur. Mitigation measures or alternatives are not required, however, where such changes are infeasible or where the responsibility for the project lies with some other agency. (Pub. Resources Code, § 21081, subd. (a)(2); CEQA Guidelines, § 15091, subds. (a), (b).)

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Public Resources Code section 21061.1 defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors.” CEQA Guidelines section 15364 includes another factor: “legal” considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors (Goleta II)* (1990) 52 Cal.3d 553, 565.)

The concept of “feasibility” also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 (*City of Del Mar*)). “[F]easibility” under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (*Ibid.*; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715 (*Sequoyah Hills*); see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 [after weighing “economic, environmental, social, and technological factors” ... ‘an agency may conclude that a mitigation measure or alternative is impracticable or undesirable from a policy standpoint and reject it as infeasible on that ground’].)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project’s “benefits” rendered “acceptable” its “unavoidable adverse environmental effects.” (CEQA Guidelines, §§ 15093, 15043, subd. (b); see also Pub. Resources Code, § 21081, subd. (b).)

In seeking to effectuate the substantive policy of CEQA to substantially lessen or avoid significant environmental effects to the extent feasible, an agency, in adopting findings, need not necessarily address the feasibility of both mitigation measures and environmentally superior alternatives when contemplating approval of a proposed project with significant impacts. Where a significant impact can be mitigated to an “acceptable” level solely by the adoption of feasible mitigation measures, the agency, in drafting its findings, has no obligation to consider the feasibility of any environmentally superior alternative that could also substantially lessen or avoid that same impact — even if the alternative would render the impact less severe than would the proposed project as mitigated. (*Laurel Hills Homeowners Association v. City Council* (1978) 83 Cal.App.3d 515, 521; see also *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 730-731; and *Laurel Heights Improvement Association v. Regents of the University of California (“Laurel Heights I”)* (1988) 47 Cal.3d 376, 400-403.)

In these findings, the City first addresses the extent to which each significant environmental effect can be substantially lessened or avoided through the adoption of feasible mitigation measures. Only after determining that, even with the adoption of all feasible mitigation measures, an effect is significant and unavoidable does the City address the extent to which alternatives described in the EIR are (i) environmentally superior with respect to that effect and (ii) “feasible” within the meaning of CEQA.

In cases in which a project’s significant effects cannot be mitigated or avoided, an agency, after adopting proper findings, may nevertheless approve the project if it first adopts a statement of overriding



considerations setting forth the specific reasons why the agency found that the “benefits of the project outweigh the significant effects on the environment.” (Pub. Resources Code, § 21081, subd. (b); see also CEQA Guidelines, §§ 15093, 15043, subd. (b).) In the statement of overriding considerations found at the end of these findings, the City identifies the specific economic, legal, social, and other considerations that, in its judgment, outweigh the significant environmental effects that the Project will cause.

The California Supreme Court has stated that “[t]he wisdom of approving ... any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” (*Goleta II* (1990) 52 Cal.3d 553 at p. 576.)

The City Council’s findings in support of its approval of the Project are set forth below for each of the significant environmental effects of and alternatives to the Project identified in the EIR pursuant to section 21080 of CEQA and section 15091 of the CEQA Guidelines. These findings provide the written analysis and conclusions of the City Council regarding the environmental impacts of the Project and the mitigation measures included as part of the EIR and adopted by the City Council as part of the Project. To avoid duplication and redundancy, and because the City Council agrees with, and hereby adopts, the conclusions in the EIR, these findings will not repeat the analysis and conclusions in the EIR, but instead incorporate them by reference in these findings and relies upon them as substantial evidence supporting these findings.

In making these findings, the City Council has considered the opinions of staff and experts, other agencies and members of the public. The City Council finds that the determination of significance thresholds is a judgment decision within the discretion of the City Council; the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the EIR preparers and City staff; and the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project. Thus, although, as a legal matter, the City Council is not bound by the significance determinations in the EIR (see Pub. Resources Code, § 21082.2, subd. (e)), the City Council finds them persuasive and hereby adopts them as its own.

As set forth below, the City Council adopts and incorporates all of the mitigation measures set forth in the EIR and the attached MMRP to substantially lessen or avoid the potentially significant and significant impacts of the Project.

## **2. Findings About Significant Environmental Impacts and Mitigation Measures**

The following sections of these findings – Sections II, III and IV – set forth the City’s findings about the EIR’s determinations regarding significant environmental impacts and the mitigation measures proposed to address them. These findings provide the written analysis and conclusions of the City regarding the environmental impacts of the Project and the mitigation measures included as part of the EIR and adopted by the City as part of the Project. To avoid duplication and redundancy, and because the City agrees with, and hereby adopts, the conclusions in the EIR, these findings will not repeat the analysis and conclusions

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in the EIR, but instead incorporates them by reference in these findings and relies upon them as substantial evidence supporting these findings.

In making these findings, the City has considered the opinions of staff and experts, other agencies, and members of the public. The City finds that the determination of significance thresholds is generally a decision requiring judgment within the discretion of City; the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the EIR preparers and City staff; and the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project. Thus, although as a legal matter, the City is not bound by the significance determinations in the EIR (see Pub. Resources Code, § 21082.2, subd. (e)), the City Council finds them persuasive and hereby adopts them as its own.

These findings do not attempt to describe the full analysis of each environmental impact contained in the EIR. Instead, a full explanation of these environmental findings and conclusions can be found in the EIR, and these findings hereby incorporate by reference the discussion and analysis in the EIR supporting the EIR's determination regarding the Project's impacts and mitigation measures designed to address those impacts. In making these findings, the City Council ratifies, adopts and incorporates in these findings, the determinations and conclusions of the EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

As set forth below, the City Council adopts and incorporates all of the mitigation measures within its authority and jurisdiction as lead agency, as set forth in the EIR and presented in the attached MMRP (Exhibit B), in order to substantially lessen or avoid the potentially significant and significant impacts of the Project. The MMRP will remain available for public review during the compliance period. In adopting mitigation measures from the EIR, the City Council intends to adopt each of the mitigation measures proposed in the EIR for the Project for adoption by the City. The City Council also intends that the MMRP should include each and every mitigation measure included in the EIR, including those assigned to responsible agencies. Accordingly, in the event a mitigation measure recommended in the EIR has inadvertently been omitted in these findings or the MMRP, any such mitigation measure is hereby adopted and/or incorporated in the findings below by reference.

In addition, mitigation measures are listed in different locations in these findings, in the MMRP, and in the EIR. The City has made every effort to ensure that the text of each mitigation measure is consistent wherever that text appears. To the extent the text differs for the same mitigation measure from one location to another, such differences are inadvertent. In those instances, the text of the mitigation measure as it appears in the MMRP shall control, unless in context it is clear that the text in the MMRP does not reflect the City's determination with respect to the mitigation measure to be adopted; in such instances, the most stringent version of the mitigation measure shall apply, regardless of whether that most stringent version appears in the findings, in the MMRP, or in the EIR.

The impact numbers and mitigation measure numbers used in these findings reflect the information contained in the EIR. In Sections II, III and IV below, the same statutory findings are made for a category

of environmental impacts and mitigation measures. Rather than repeat the identical finding dozens of times to address each and every significant effect and mitigation measure, the initial finding obviates the need for such repetition because in no instance is the City Council rejecting the conclusions of the EIR or the mitigation measures recommended in the EIR for the Project.

## **Section II. Impacts Found to have No Impact or be Less Than Significant and Thus Requiring No Mitigation**

Under CEQA, no mitigation measures are required for impacts that are less than significant (Public Resources Code section 21002; CEQA Guidelines section 15126.4, subd. (a)(3), section 15091). Based on substantial evidence in the entire record of this proceeding, the City Council finds that implementation of the Project will not result in any significant impacts in the following areas and that these impact areas, therefore, do not require mitigation. As stated above, these findings do not repeat the analysis and conclusions in the EIR, but instead incorporate them by reference in these findings and rely upon them as substantial evidence supporting these findings.

### **A. Aesthetics**

1. Impact 3.1-1: Construction and operation of the Proposed Project could substantially degrade the existing visual character or quality of public views of the site and its surroundings, or could conflict with the City's zoning and regulations governing scenic quality. (Refer to pages 3.1-20 through 3.1-40 of the Draft EIR.)
2. Impact 3.1-3: Construction and operation of the Proposed Project could cast shadows on shadow-sensitive uses for more than three hours between the hours of 9:00 AM and 3:00 PM PST on either the summer or winter solstice. (Refer to pages 3.1-52 through 3.1-60 of the Draft EIR.)
3. Impact 3.1-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could substantially degrade the existing visual character or quality of public views of the site and its surroundings, or conflict with the City's zoning and regulations governing scenic quality. (Refer to page 3.1-61 of the Draft EIR.)

### **B. Air Quality**

1. Impact 3.2-3: Construction and operation of the Proposed Project could expose sensitive receptors to substantial pollutant concentrations. (Refer to pages 3.2-91 through 3.1-102 of the Draft EIR.)
2. Impact 3.2-4: Construction and operation of the Proposed Project could result in other emissions (such as those leading to odors). (Refer to page 3.2-103 of the Draft EIR.)
3. Impact 3.2-7: Construction and operation Proposed Project, in conjunction with other cumulative development, could contribute to a cumulative exposure of sensitive receptors to substantial pollutant concentrations. (Refer to pages 3.2-107 through 3.1-109 of the Draft EIR.)

4. Impact 3.2-8: Construction and operation Proposed Project, in conjunction with other cumulative development, could result in cumulative increases of other emissions (such as those leading to odors). (Refer to page 3.2-109 of the Draft EIR.)

### **C. Biological Resources**

1. Impact 3.3-1: Construction and operation of the Proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. (Refer to page 3.3-13 of the Draft EIR.)
2. Impact 3.3-4: Construction and operation of the Proposed Project, in combination with other cumulative development, could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (Refer to pages 3.3-18 through 3.3-19 of the Draft EIR.)
3. Impact 3.3-5: Construction and operation of the Proposed Project, in combination with other cumulative projects, could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Refer to page 3.3-19 of the Draft EIR.)

### **D. Energy Demand and Conservation**

1. Impact 3.5-1: Construction and operation of the Proposed Project could cause wasteful, inefficient, or unnecessary consumption of energy resources. (Refer to pages 3.5-27 through 3.5-37 of the Draft EIR.)
2. Impact 3.5-2: Construction and operation of the Proposed Project could conflict with or obstruct a State or local plan for renewable energy or energy efficiency. (Refer to pages 3.5-38 through 3.5-39 of the Draft EIR.)
3. Impact 3.5-3: Construction and operation of the Proposed Project could result in the relocation or construction of new or expanded electric power, natural gas or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. (Refer to pages 3.5-40 through 3.5-44 of the Draft EIR.)
4. Impact 3.5-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could cause wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation of the Proposed Project. (Refer to pages 3.5-44 through 3.5-45 of the Draft EIR.)
5. Impact 3.5-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could conflict with or obstruct a State or local plan for renewable energy or energy efficiency. (Refer to pages 3.5-45 through 3.5-46 of the Draft EIR.)
6. Impact 3.5-6: Construction and operation of the Proposed Project, in conjunction with other cumulative development, would result in the relocation or construction of new or expanded electric power, natural gas or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. (Refer to pages 3.5-46 through 3.5-48 of the Draft EIR.)

## **E. Greenhouse Gas Emissions**

1. Impact 3.7-2: Construction and operation of the Proposed Project could be inconsistent with applicable plans, policies and regulations adopted for the purpose of reducing the emissions of GHGs. (Refer to pages 3.7-65 through 3.6-71 of the Draft EIR.)

## **F. Hazards and Hazardous Materials**

1. Impact 3.8-1: Construction and operation of the Proposed Project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Refer to pages 3.8-32 through 3.6-35 of the Draft EIR.)

2. Impact 3.8-2: Construction and operation of the Proposed Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Refer to pages 3.8-35 through 3.6-37 of the Draft EIR.)

3. Impact 3.8-3: Construction and operation of the Proposed Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Refer to pages 3.8-37 through 3.6-39 of the Draft EIR.)

4. Impact 3.8-6: Construction and operation of the Proposed Project could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Refer to pages 3.8-48 through 3.6-49 of the Draft EIR.)

5. Impact 3.8-7: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Refer to page 3.8-50 of the Draft EIR.)

6. Impact 3.8-8: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Refer to page 3.8-51 of the Draft EIR.)

7. Impact 3.8-9: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Refer to pages 3.8-52 through 3.6-53 of the Draft EIR.)

8. Impact 3.8-10: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could be located on sites that are included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, could create a significant hazard to the public or the environment. (Refer to pages 3.8-53 through 3.6-54 of the Draft EIR.)

9. Impact 3.8-11: Construction and operation of the Proposed Project, in conjunction with other cumulative development, would be located within an airport land use plan area and could cumulatively result in a safety hazard or excessive noise for people residing or working in the project area, or could create a hazard to navigable airspace and/or operations at a public airport. (Refer to pages 3.8-55 through 3.6-56 of the Draft EIR.)

10. Impact 3.8-12: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Refer to pages 3.8-56 of the Draft EIR.)

## **G. Hydrology and Water Quality**

1. Impact 3.9-2: Construction and operation of the Proposed Project could substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, or conflict with or obstruct implementation of sustainable groundwater management plan. (Refer to pages 3.9-24 through 3.6-26 of the Draft EIR.)

2. Impact 3.9-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development within areas served by the WCGB and Central Basin groundwater basins, could cumulatively decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, or conflict with or obstruct implementation of sustainable groundwater management plan. (Refer to pages 3.9-32 through 3.9-33 of the Draft EIR.)

## **H. Land Use and Planning**

1. Impact 3.10-1: Construction and operation of the Proposed Project could physically divide an established community. (Refer to pages 3.10-29 through 3.10-31 of the Draft EIR.)

2. Impact 3.10-2: Construction and operation of the Proposed Project could conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (Refer to pages 3.10-32 through 3.10-34 of the Draft EIR.)

3. Impact 3.10-3: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could physically divide an established community. (Refer to pages 3.10-35 through 3.10-37 of the Draft EIR.)

4. Impact 3.10-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (Refer to pages 3.10-37 through 3.10-38 of the Draft EIR.)

## **I. Noise and Vibration**

1. Impact 3.11-4: The Proposed Project is located within the Planning Boundary/Airport Influence Area for LAX as designated within the airport land use plan and could expose people residing or working in the region surrounding the Project Site to excessive noise levels. (Refer to pages 3.11-186 through 3.11-188 of the Draft EIR.)

2. Impact 3.11-8: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could expose people residing or working in the region surrounding the Project Site to excessive noise levels from airport noise. (Refer to page 3.11-230 of the Draft EIR.)

## **J. Population, Employment, and Housing**

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1. Impact 3.12-1: Construction and operation of the Proposed Project could induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). (Refer to pages 3.12-12 through 3.12-15 of the Draft EIR.)
2. Impact 3.12-2: Construction and operation of the Proposed Project could displace substantial numbers of existing people or housing units necessitating the construction of replacement housing elsewhere. (Refer to pages 3.12-15 through 3.12-18 of the Draft EIR.)
3. Impact 3.12-3: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could contribute to cumulative substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads and other infrastructure). (Refer to pages 3.12-18 through 3.12-19 of the Draft EIR.)
4. Impact 3.12-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could displace substantial numbers of existing people or housing units necessitating the construction of replacement housing elsewhere. (Refer to pages 3.12-19 through 3.12-22 of the Draft EIR.)

**K. Public Services**

1. Impact 3.13-1: Construction and operation of the Proposed Project could result in substantial adverse physical impacts associated with the provision of new or physically altered facilities for the provision of fire protection and emergency medical services, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. (Refer to pages 3.13-13 through 3.13-19 of the Draft EIR.)
2. Impact 3.13-2: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could result in substantial adverse physical impacts associated with the provision of or need for new or physically altered facilities for the provision of fire protection and emergency medical services, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. (Refer to pages 3.13-19 through 3.13-32 of the Draft EIR.)
3. Impact 3.13-3: Construction and operation of the Proposed Project could result in substantial adverse physical impacts associated with the provision of or need for new or physically altered facilities for police protection services, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives for police protection. (Refer to pages 3.13-32 through 3.13-35 of the Draft EIR.)
4. Impact 3.13-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could contribute to cumulative substantial adverse physical impacts associated with the provision of or need for new or physically altered facilities for police protection services, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives for police protection. (Refer to pages 3.13-35 through 3.13-42 of the Draft EIR.)
5. Impact 3.13-5: Construction and operation of the Proposed Project could result in substantial adverse physical impacts associated with the need for or provision of new or physically altered parks or

recreational facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks or recreational facilities. (Refer to pages 3.13-42 through 3.13-44 of the Draft EIR.)

6. Impact 3.13-6: Construction and operation of the Proposed Project could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated. (Refer to pages 3.13-44 through 3.13-45 of the Draft EIR.)
7. Impact 3.13-7: Construction and operation of the Proposed Project could include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. (Refer to pages 3.13-45 through 3.13-46 of the Draft EIR.)
8. Impact 3.13-8: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could contribute to cumulative substantial adverse physical impacts associated with the need for or provision of new or physically altered parks or recreational facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks or recreational facilities. (Refer to pages 3.13-46 through 3.13-49 of the Draft EIR.)
9. Impact 3.13-9: Construction and operation of the Proposed Project, in conjunction with related cumulative development, could contribute to the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. (Refer to page 3.13-49 of the Draft EIR.)
10. Impact 3.13-10: Construction and operation of the Proposed Project, in conjunction with related cumulative projects, could include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. (Refer to page 3.13-50 of the Draft EIR.)
11. Impact 3.13-11: Construction and operation of the Proposed Project could result in substantial adverse physical impacts associated with the need for or provision of new or physically altered schools, the construction of which could cause significant environmental impacts. (Refer to pages 3.13-60 through 3.13-64 of the Draft EIR.)
12. Impact 3.13-12: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could contribute to cumulative substantial adverse physical impacts associated with the need for or provision of new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools. (Refer to pages 3.13-66 through 3.13-68 of the Draft EIR.)

#### **L. Transportation and Circulation**

1. Impact 3.14-7: Operation of the Proposed Project ancillary land uses could have the potential to cause significant impacts on freeway facilities under Adjusted Baseline conditions. (Refer to page 3.14-240 of the Draft EIR.)



2. Impact 3.14-12: The Proposed Project could have the potential to adversely affect existing or planned bicycle facilities; or fail to adequately provide for access by bicycle. (Refer to pages 3.14-247 through 3.14-248 of the Draft EIR.)
3. Impact 3.14-22: Operation of the Proposed Project ancillary land uses could have the potential to cause significant impacts on freeway facilities under cumulative conditions. (Refer to page 3.14-292 of the Draft EIR.)

#### **M. Utilities and Service Systems**

1. Impact 3.15-1: Construction and operation of the Proposed Project could require or result in the relocation or construction of new or expanded water facilities, the construction of which could cause significant environmental effects. (Refer to pages 3.15-35 through 3.15-38 of the Draft EIR.)
2. Impact 3.15-2: Construction and operation of the Proposed Project could result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. (Refer to pages 3.15-38 through 3.15-48 of the Draft EIR.)
3. Impact 3.15-3: Construction and operation of the Proposed Project, in conjunction with other cumulative development within the GSWC Southwest System, could require or result in the relocation or construction of new or expanded water treatment facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. (Refer to page 3.15-48 of the Draft EIR.)
4. Impact 3.15-4: Operation of the Proposed Project, in conjunction with other cumulative development and future water demands within GSWC's Southwest System, could result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. (Refer to page 3.15-49 of the Draft EIR.)
5. Impact 3.15-5: Operation of the Proposed Project could result in a determination by LACSD, which would serve the project, that it does not have adequate capacity to serve the project's projected demand in addition to LACSD's existing commitments. (Refer to pages 3.15-57 through 3.15-60 of the Draft EIR.)
6. Impact 3.15-6: Operation of the Proposed Project could require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. (Refer to page 3.15-59 of the Draft EIR.)
7. Impact 3.15-7: Operation of the Proposed Project, in conjunction with other cumulative development that would be served by the JWPCP, could cumulatively result in a determination by LACSD that it does not have adequate capacity to serve the project's projected demand in addition to LACSD's existing commitments. (Refer to pages 3.15-60 through 3.15-63 of the Draft EIR.)
8. Impact 3.15-8: Operation of the Proposed Project, in conjunction with other cumulative development, could require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. (Refer to page 3.15-63 of the Draft EIR.)
9. Impact 3.15-11: Construction and operation of the Proposed Project could generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, and could otherwise

impair the attainment of solid waste reduction goals. (Refer to pages 3.15-79 through 3.15-81 of the Draft EIR.)

10. Impact 3.15-12: Construction and operation of the Proposed Project could conflict with federal, State, and local management and reduction statutes and regulations related to management and reduction of solid waste. (Refer to page 3.15-81 of the Draft EIR.)

11. Impact 3.15-13: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could cumulatively generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, and could otherwise cumulatively impair the attainment of solid waste reduction goal. (Refer to pages 3.15-82 through 3.15-88 of the Draft EIR.)

12. Impact 3.15-14: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could conflict with federal, State, and local statutes and regulations related to management and reduction of solid waste. (Refer to page 3.15-88 of the Draft EIR.)

### **Section III. Significant or Potentially Significant Impacts Mitigated to a Less Than Significant Level**

The following significant and potentially significant environmental impacts of the Project, including cumulative impacts, are being mitigated to a less than significant level and are set out below. Pursuant to section 21081(a)(1) of CEQA and section 15091(a)(1) of the CEQA Guidelines, as to each such impact, the City Council, based on the evidence in the record before it, finds that changes or alterations incorporated into the Project by means of conditions or otherwise, mitigate, avoid or substantially lessen to a level of insignificance these significant or potentially significant environmental impacts of the Project. The basis for the finding for each identified impact is set forth below.

#### **A. Aesthetics**

1. **Impact 3.1-2: Construction and operation of the Proposed Project could create a new source of substantial light or glare which could adversely affect day or nighttime views in the area. (Refer to pages 3.1-41 through 3.1-52 of the Draft EIR.)**

**Mitigation Measure 3.1-2(a):** Construction Lighting. The project applicant shall implement the following measures to avoid or minimize disturbances related to construction lighting:

- Require construction contractors use construction-related lighting only where and when necessary for completion of the specific construction activity.
- Require construction contractors to ensure that all temporary lighting related to construction activities or security of the Project Site is shielded or directed to avoid or minimize any direct illumination onto light-sensitive properties located outside of the Project Site.
- Designate a Community Affairs Liaison and create a telephone hotline and email address to reach this person, 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

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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 complaints related to construction activities of the Project. The Community Affairs Liaison shall coordinate with a designated construction contractor representative to implement the following:

- o Document and respond to each lighting complaint.
- o Attempt to contact the person(s) making the lighting complaint as soon as feasible and no later than one construction work day.
- o 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.
- o 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:

- o Confirming construction lighting equipment and related direction and shielding devices are maintained per manufacturer's specifications;
  - o Ensuring construction lighting is not operated unnecessarily; and/or
  - o Evaluating and implementing feasible relocations of lighting equipment, alternatives to specific types of lighting equipment, or changes to direction and shielding equipment, as appropriate.
- Adjacent residents within 500 feet of the Project Site shall be notified of the construction schedule, as well as the name and contact information of the project Community Affairs Liaison.

**Mitigation Measure 3.1-2(b): Lighting Design Plan.** Prior to issuance of a building permit, the project applicant shall submit to the City a Lighting Design Plan, based on photometric data, that demonstrates that project-contributed lighting from light-emitting diode (LED) lights, illuminated signs, or any other project lighting onto the light-sensitive receptor properties identified as SR 1, SR 2, and SR 4 in the LDA lighting analysis report would not result in more than 2 foot-candles of lighting intensity or generate direct glare onto the property so long as those sites are occupied by light-sensitive receptor uses, or that an illuminated sign from the Project would produce a light intensity of greater than 3 foot-candles above ambient lighting on residentially zoned property. Where existing conditions exceed these levels, the Lighting Design Plan shall avoid exacerbating existing conditions, but need not further reduce light levels on light-sensitive receptor properties.

Measures to ensure that the lighting and illuminated signage from the Project would not exceed the identified thresholds may include but are not limited to relocating and or/shielding pole- or building-mounted LED lights; directing illuminated signage away from residential properties; implementing a screening material for parking garages or other structures to allow ventilation while reducing the amount of spill light; designing exterior lighting to confine illumination to the Project Site; restricting the operation of outdoor lighting to certain hour after events are completed; limiting the luminosity of certain lights or signs; and/or providing structural and/or vegetative screening from sensitive uses.

**Mitigation Measure 3.1-2(c): Hotel Design.** The design of the proposed hotel shall be prohibited from using (1) reflective glass that exceeds 50 percent of any building surface and on the bottom three floors, (2) mirrored glass, (3) black glass that exceeds 25 percent of any surface of any building, and (4) metal building materials that exceed 50 percent of any street-facing surface of a building.

**Basis for Finding:** Mitigation Measure 3.1-2(a) requires the project applicant to implement measures to avoid or reduce adverse effects of construction and security lighting on light-sensitive receptors outside of the Project Site, thereby ensuring that nuisances or hazards resulting from construction light sources would be avoided or minimized. Mitigation Measure 3.1-2(b) requires the project applicant to provide to the City a lighting design plan that demonstrates that project-contributed lighting would not result in lighting intensity or glare onto the residential properties identified as SR 1, SR 2, and SR 4 to exceed appropriate levels. Mitigation Measure 3.1-2(c) prohibits the use or positioning of materials in the proposed hotel that would produce excessive or hazardous glare. With implementation of Mitigation Measures 3.1-2(a), 3.1-2(b), and 3.1-2(c), this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**2. Impact 3.1-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could cumulatively create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. (Refer to pages 3.1-61 through 3.1-63 of the Draft EIR.)**

**Mitigation Measure 3.1-5:** Implement Mitigation Measures 3.1-2(a), 3.1-2(b), and 3.1-2(c) Construction Lighting, Lighting Design Plan, and Hotel Design.

**Basis for Finding:** Mitigation Measure 3.1-2(a) requires the project applicant to implement measures to avoid or reduce adverse effects of construction and security lighting on light-sensitive receptors outside of the Project Site, thereby ensuring that nuisances or hazards resulting from construction light sources would be avoided or minimized. Mitigation Measure 3.1-2(b) requires the project applicant to provide to the City a lighting design plan that demonstrates that project-contributed lighting would not result in lighting intensity or glare onto the residential properties identified as SR 1, SR 2, and SR 4 to exceed appropriate levels. Mitigation Measure 3.1-2(c) prohibits the use or positioning of materials in the proposed hotel that would produce excessive or hazardous glare. With implementation of Mitigation Measures 3.1-2(a), 3.1-2(b), and 3.1-2(c), the Proposed Project's contribution to glare impacts would be less than cumulatively considerable, and the cumulative impact of spillover light and glare would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

## **B. Biological Resources**

**1. Impact 3.3-2: Construction of the Proposed Project could have the potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (Refer to pages 3.3-14 through 3.3-15 of the Draft EIR.)**

**Mitigation Measure 3.3-2:** The project applicant shall conduct tree removal activities required for construction of the Project outside of the resident or migratory bird and raptor breeding season (February 1 through August 31) where feasible. For construction activities or ground disturbing activities such as demolition, tree and vegetation removal, or grading that would occur between February 1 through August 31, the project applicant shall retain a qualified biologist to conduct preconstruction surveys not more

than one week prior to the commencement of construction activities in suitable nesting habitat within the Project Site for nesting birds and raptors. This survey shall include areas located within 100 feet from construction to avoid indirect impacts to nesting birds. During the preconstruction survey, nests detected shall be mapped using global positioning system software, and species confirmed to be nesting or likely nesting will be determined.

If active nests for avian species protected under the Migratory Bird Treaty Act or California Fish and Game Code are found during the survey, the qualified biologist shall determine an appropriate buffer for avoiding the nest (where no work will occur) until the biologist is able to determine that the nest is no longer active. A minimum 100-foot no-work buffer shall be established around any active bird nest; however, the buffer distance may be adjusted by a qualified biologist depending on the nature of the work that is occurring in the vicinity of the nest, the known tolerance of the species to noises and vibrations, and/or the location of the nest. If, in the professional opinion of the qualified biologist, the Project would impact a nest, the biologist shall immediately inform the construction manager and work activities shall stop until the biologist delineates a suitable buffer distance and/or determines that the nest is no longer active.

**Basis for Finding:** With the implementation of Mitigation Measure 3.3-2, construction of the Proposed Project would no longer have the potential to disturb active nests for nesting birds and raptors. Active nests would be identified and suitable buffers would be established to ensure that construction activities do not disturb nesting birds. Mitigation measures would thus ensure that the Proposed Project would not cause a substantial reduction in local population size or reduce reproductive success to birds and raptors. Thus, this impact would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**2. Impact 3.3-3: Construction of the Proposed Project could have the potential to conflict with local policies or ordinances protecting biological resource, such as a tree preservation policy or ordinance. (Refer to pages 3.3-16 through 3.3-18 of the Draft EIR.)**

**Mitigation Measure 3.3-3:**

- a) To ensure that all new trees planted at a 1:1 ratio as required by the City's Tree Preservation Ordinance are of sufficient size, quantity, and quality, the following shall be implemented:
  - Prior to any on-site tree disturbance or removal of any protected tree, a tree permit shall be obtained from the City of Inglewood in accordance with the City of Inglewood Tree Preservation Ordinance (Inglewood Municipal Code Chapter 12, Article 32). The tree permit shall identify the appropriate size of tree to be replaced (i.e., 36-inch box tree).
  - All replacement mitigation trees shall be monitored by a certified arborist annually for minimum of 3 years following the completion of construction and planting, respectively. Monitoring shall verify that all encroached and replacement trees are in good health at the end of the 3-year monitoring period. Any encroached or replacement tree that dies within the 3-year monitoring period shall be replaced, and the replacement tree shall be monitored annually for 3 years. Annual monitoring reports shall be prepared by a certified arborist and submitted to the City. The monitoring report shall depict the location of each encroachment and replacement mitigation tree, including a description of the health of each tree based on a visual assessment.
- b) To ensure proper protection of trees to remain during project construction, the following shall be implemented.

- The Tree Protective Zone (TPZ) of protected trees to be retained and that are located within 25 feet from the grading limits, shall be enclosed with temporary fencing (e.g., free-standing chain-link, orange mesh drift fencing, post and wire, or equivalent). A smaller TPZ may be established in consultation with a certified arborist. The fencing shall be located at the limits of the TPZ and shall remain in place for the duration of construction activities in the area, or as determined by the City.
- Prune selected trees to provide necessary clearance during construction and to remove any defective limbs or other parts that may pose a failure risk. All pruning shall be completed (or supervised) by a certified arborist and adhere to the Tree Pruning Guidelines of the International Society of Arboriculture. Trenching shall be routed so as to minimize damage to roots of protected trees roots if feasible. Any required trenching within the TPZ should be accomplished by the use of hand tools, to the extent feasible, while under the direct supervision of a certified arborist. If roots larger than 2 inches in diameter are encountered, the arborist shall provide recommendations for pruning or avoidance. Any major roots encountered should be conserved if feasible and treated as recommended by the arborist. If extensive disturbance to tree roots would occur such that tree health would be impacted as determined by the certified arborist, the tree shall be replaced at 1:1 per Mitigation Measure 3.3-3(a) above.
- Any work conducted within the TPZ of a protected tree shall be monitored by a certified arborist. The monitoring arborist shall prescribe measures for minimizing or avoiding long-term impacts to the tree, such as selective pruning to minimize construction impacts.
- No storage of equipment, supplies, vehicles, or debris should be allowed within the TPZ of a protected tree. No dumping of construction wastewater, paint, stucco, concrete, or any other clean-up waste should occur within the TPZ. No temporary structures should be placed within the TPZ.

**Basis for Finding:** With the implementation of Mitigation Measure 3.3-3, the Proposed Project would not conflict with local policies or ordinances, including Inglewood Municipal Code Chapter 12, Article 32, the City of Inglewood Tree Preservation Ordinance. Mitigation for the loss of protected trees would consist of replacement at a ratio determined in consultation with the City of Inglewood Parks, Recreation and Library Community Services Department pursuant to the Tree Preservation Ordinance. Mitigation Measure 3.3-3 would ensure that construction-related impacts are minimized or avoided to trees that would be encroached and/or retained on the Project Site; therefore, impacts would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

### **C. Cultural and Tribal Cultural Resources**

#### **1. Impact 3.4-1: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5. (Refer to pages 3.4-21 through 3.3-27 of the Draft EIR.)**

**Mitigation Measure 3.4-1:** Retention of Qualified Archaeologist. Prior to the start of ground-disturbing activities associated with the Project, including demolition, trenching, grading, and utility installation, the project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources.

- a) Monitoring and Mitigation Plan. Prepare, design, and implement a monitoring and mitigation program for the Project. The Plan shall define pre-construction coordination, construction monitoring

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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 archaeological remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Plan shall be prepared and approved prior to the issuance of the first grading permit.

- 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 (a), 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.
- c) Archaeological and Native American Monitoring. The qualified archaeologist will oversee archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations such as grading, trenching, or any other excavation activity associated with the Project and as defined in the Monitoring and Mitigation Plan. If, after advanced notice, the Tribe declines, is unable, or does not respond to the notice, construction can proceed under supervision of the qualified archaeologist. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the quantity and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist and the Native American monitor.
- d) In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 50 feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).
- e) If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.
- f) In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the project applicant, and appropriate Native American representatives (if the find is of Native American origin). The Cultural Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university or museum with a research interest in the materials, if such an institution agrees to accept them. If resources are determined to be Native American in origin, they will first be offered to the Tribe for permanent curation, repatriation, or reburial, as directed by the Tribe. If no institution or Tribe accepts the archaeological material, then the material shall be donated to a local school or historical society in the area for educational purposes.

- g) If the resource is identified as a Native American, the qualified archaeologist and project applicant shall consult with appropriate Native American representatives, as identified through the AB 52 consultation process in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered, to the extent feasible.
- h) Prepare a final monitoring and mitigation report for submittal to the applicant, and the South Central Coastal Information Center (SCCIC), in order to document the results of the archaeological and Native American monitoring. If there are significant discoveries, artifact and feature analysis and final disposition shall be included with the final report, which will be submitted to the SCCIC and the applicant. The final monitoring report shall be submitted to the applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.

**Basis for Finding:** Mitigation Measure 3.4-1 would avoid and/or substantially lessen the above impact by ensuring that any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. Therefore, the recommended Mitigation Measure 3.4-1 for the retention of a qualified archaeologist, cultural resources sensitivity training, and inadvertent discovery protocols is proposed to address potential impacts. With implementation of Mitigation Measure 3.4-1, the impact to any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**2. Impact 3.4-2: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5. (Refer to pages 3.4-27 through 3.3-28 of the Draft EIR.)**

**Mitigation Measure 3.4-2:** Implement Mitigation Measure 3.4-1.

**Basis for Finding:** Mitigation Measure 3.4-2 would avoid and/or substantially lessen the above impact by ensuring that any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. Therefore, the recommended Mitigation Measure 3.4-2 for the retention of a qualified archaeologist, cultural resources sensitivity training, archaeological and Native American monitoring and inadvertent discovery protocols is proposed to address potential impacts. With implementation of Mitigation Measure 3.4-2, the impact to any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**3. Impact 3.4-3: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: i) Listed or eligible for listing in**

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the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k). ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. (Refer to pages 3.4-29 through 3.3-35 of the Draft EIR.)

**Mitigation Measure 3.4-3:** Implement Mitigation Measure 3.4-1.

**Basis for Finding:** As documented in the July 15, 2019, letter closing Tribal consultation, the City and the Tribe are in mutual agreement that the Proposed Project would not result in potentially significant impacts to Tribal cultural resources with implementation of Mitigation Measure 3.4-3. Mitigation Measure 3.4-3 would avoid and/or substantially lessen the above impact by ensuring that any unanticipated tribal cultural resources are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. With implementation of Mitigation Measure 3.4-3, the impact to any unanticipated Tribal cultural resources would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**4. Impact 3.4-4: Construction of the Proposed Project could have the potential to disturb human remains including those interred outside of dedicated cemeteries. (Refer to pages 3.4-35 through 3.3-36 of the Draft EIR.)**

**Mitigation Measure 3.4-4: Inadvertent Discovery of Human Remains.** In the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the Project, all work shall immediately cease within 100 feet of the discovery and the County Coroner shall be contacted in accordance with PRC section 5097.98 and Health and Safety Code section 7050.5. The project applicant shall also be notified. If the County Coroner determines that the remains are Native American, the California Native American Heritage Commission (NAHC) shall be notified in accordance with Health and Safety Code section 7050.5, subdivision (c), and PRC section 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendant (MLD) for the remains per PRC section 5097.98. Until the landowner has conferred with the MLD, the project applicant shall ensure that a 50-foot radius around where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

**Basis for Finding:** Mitigation Measure 3.4-4 requires notification of the County Coroner in the event of the unanticipated discovery of human remains and a proscribed protocol for their disposition in accordance with applicable regulations, notification of the NAHC, and subsequent Tribal coordination if remains are determined to be of Native American descent. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in PRC section 5097.94(k), if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. Thus, the impact would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**5. Impact 3.4-5: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to result in cumulatively considerable impacts to historical resources. (Refer to pages 3.4-36 through 3.3-37 of the Draft EIR.)**

**Mitigation Measure 3.4-5:** Implement Mitigation Measure [ REF MM3\_4\_1 \h \\* MERGEFORMAT ] (Retention of Qualified Archaeologist).

**Basis for Finding:** Mitigation Measure 3.4-5 would ensure that archaeological monitoring would discover unanticipated archaeological resources that qualify as historical resources, during construction, that will be identified, evaluated and treated promptly before they can be damaged or destroyed during construction, and reducing significant project-level impacts on archaeological resources that are historical resources under CEQA. Therefore, with mitigation, the Proposed Project would not have a considerable contribution to a cumulative impact on archaeological resources and would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**6. Impact 3.4-6: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on archaeological resources. (Refer to pages 3.4-37 through 3.3-38 of the Draft EIR.)**

**Mitigation Measure 3.4-6:** Implement Mitigation Measure [ REF MM3\_4\_1 \h \\* MERGEFORMAT ] (Retention of Qualified Archaeologist).

**Basis for Finding:** Mitigation Measure 3.4-6 would ensure that archaeological monitoring would discover unanticipated archaeological resources, during construction, that will be identified, evaluated and treated promptly before they can be damaged or destroyed during construction, and reducing significant project-level impacts on archaeological resources that are historical resources under CEQA. Therefore, with mitigation, the Proposed Project would not have a considerable contribution to a cumulative impact on archaeological resources and would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**7. Impact 3.4-7: Construction of the Proposed Project, in conjunction with construction of other cumulative development, could have the potential to contribute to cumulative impacts on the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074. (Refer to pages 3.4-38 through 3.3-39 of the Draft EIR.)**

**Mitigation Measure 3.4-7:** Implement Mitigation Measure [ REF MM3\_4\_1 \h \\* MERGEFORMAT ] (Retention of Qualified Archaeologist).

**Basis for Finding:** As documented in the July 15, 2019, letter closing Tribal consultation, the City and the Tribe are in mutual agreement that the Proposed Project would not result in potentially significant

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impacts to Tribal cultural resources with implementation of Mitigation Measure 3.4-7. Mitigation Measure 3.4-7 would avoid and/or substantially lessen the above impact by ensuring that any unanticipated Tribal cultural resources are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. Therefore, with mitigation, the Proposed Project would not have a considerable contribution to a cumulative impact to any unanticipated Tribal cultural resources and would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**8. Impact 3.4-8: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on human remains including those interred outside of dedicated cemeteries. (Refer to pages 3.4-39 through 3.3-40 of the Draft EIR.)**

**Mitigation Measure 3.4-8:** Implement Mitigation Measure 3.4.4.

**Basis for Finding:** Implementation of Mitigation Measure 3.4-8 would ensure that all work immediately cease within 100 feet of the discovery, all relevant PRC and Health and Safety Codes that pertain to human remains discovery are followed, and the identified appropriate actions have taken place. Therefore, with mitigation, the Proposed Project would not have a considerable contribution to a cumulative impact on human remains and would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

#### **D. Geology and Soils**

**1. Impact 3.6-1: Construction and operation of the Proposed Project could have the potential to result in the substantial erosion or the loss of topsoil. (Refer to pages 3.6-25 through 3.6-26 of the Draft EIR.)**

**Mitigation Measure 3.6-1:** Implement Mitigation Measure 3.9-1(a). Comply with Applicable Regulations as Approved by the City and the Los Angeles Regional Water Quality Control Board (RWQCB).

**Basis for Finding:** With the implementation of Mitigation Measure 3.6-1, the Proposed Project would comply with the MS4 permit regulations, NPDES General Construction Permit, Inglewood Municipal Code regulation, the County's LID Standards manual, and the USGBC's LEED Program. In addition, an LID Plan and SWPPP will be prepared to the satisfaction of the City and Los Angeles RWQCB. Therefore, the Proposed Project would not result in substantial erosion or the loss of topsoil. Thus, this impact would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**2. Impact 3.6-2: Construction of the Proposed Project could have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Refer to pages 3.6-27 through 3.6-29 of the Draft EIR.)**

**Mitigation Measure 3.6-2:** A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) shall be retained by the project applicant and approved by the City prior to the approval of grading permits. The qualified paleontologist shall:

- a) Prepare, design, and implement a monitoring and mitigation 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.
- b) Conduct construction worker paleontological 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 (a). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall provide instruction on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the qualified paleontologist demonstrating that the appropriate construction personnel attended the training.
- c) Direct the performance of paleontological resources monitoring by a qualified paleontological monitor (meeting the standards of the SVP, 2010). Paleontological resources monitoring shall be conducted pursuant to the monitoring and mitigation program developed under (a), above. Monitoring activities may be altered or ceased if determined adequate by the qualified paleontologist. Monitors shall have the authority to, and shall temporarily halt or divert work away from exposed fossils or potential fossils, and establish a 50-foot radius temporarily halting work around the find. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries.
- d) If fossils are encountered, determine their significance, and, if significant, supervise their collection for curation. Any fossils collected during Project-related excavations, and determined to be significant by the qualified paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.
- e) Prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the paleontological monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which will be submitted to the appropriate repository and the City. The final monitoring report shall be submitted to the City within 90 days of completion of excavation and other ground disturbing activities that could affect Older Quaternary Alluvium.

**Basis for Finding:** Implementation of Mitigation Measure 3.6-2 would ensure that paleontological resources would be identified before they are damaged or destroyed, and are properly evaluated and treated. Thus, the impact would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**3. Impact 3.6-3: Construction and operation of the Proposed Project in conjunction with other cumulative development, could have the potential to result in substantial erosion or loss of topsoil. (Refer to pages 3.6-29 through 3.6-30 of the Draft EIR.)**

**Mitigation Measure 3.6-3:** Implement Mitigation Measure 3.9-1(a). Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB.

**Basis for Finding:** With the implementation of Mitigation Measure 3.6-3, the Proposed Project would comply with the MS4 permit regulations, NPDES General Construction Permit, Inglewood Municipal Code regulation, the County's LID Standards manual, and the USGBC's LEED Program. In addition, an LID Report and SWPPP will be prepared to the satisfaction of the City and Los Angeles RWQCB. Therefore, the Proposed Project would not have a considerable contribution to a cumulative impact related to erosion or loss of topsoil and would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**4. Impact 3.6-4: Construction of the Proposed Project, in conjunction with other cumulative development, could have the potential to contribute to cumulative impacts on paleontological resources. (Refer to pages 3.6-30 through 3.6-31 of the Draft EIR.)**

**Mitigation Measure 3.6-4:** Implement Mitigation Measure 3.6-2.

**Basis for Finding:** Mitigation Measure 3.6-4 would lessen the Proposed Project contribution to the loss of paleontological resources by requiring that work stop if such resources are discovered until the resource can be evaluated, collected, properly treated, and curated with accredited repository with retrievable storage. With implementation of this mitigation measure, the Proposed Project contribution to the cumulative loss of paleontological resources would be less than cumulatively considerable, and, therefore, this cumulative impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

## **E. Greenhouse Gas Emissions**

**1. Impact 3.7-1: Construction and operation of the Proposed Project could generate "net new" GHG emissions, either directly or indirectly, that could have a significant impact on the environment. (Refer to pages 3.7-51 through 3.6-65 of the Draft EIR.)**

**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. Estimate the Project's net new GHG emissions over the 30-year operational life of the Project. The estimate shall be based on final design, project-specific traffic generation, actual energy use estimates, equipment to be used on site, and other emission factors appropriate for the Project, using the best available emissions factors for electricity, transportation engines, and other GHG emission sources commonly used at the time the GHG Reduction Plan is completed, reflecting existing vehicle emission standards and building energy standards. Net operational (incremental) emissions shall be derived by adding the annual operational emissions and backfill emissions and then subtracting from that total existing emissions and emissions from relocated LA Clippers games and market shifted non-NBA events, as illustrated in Table 3.7-9a and Table 3.7-9b. The estimate shall include the Project's construction GHG emissions, which shall be amortized over the 30-year operational life of the Project, shown in Table 3.7-7 to be 603 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>)/year.
- 2) GHG Mitigation. Include reduction measures that are sufficient to reduce or offset incremental emissions over the net neutral threshold, are verifiable, and are feasible to implement over project life. At a minimum, the GHG Reduction Plan shall include: (i) implementation of all measures set forth under Section A. below; and (ii) emissions reductions associated with implementation of Project Design Features 3.2-1 and 3.2-2 and Mitigation Measures 3.2-2(b) and 3.14-2(b) regarding the reduction of NO<sub>x</sub> and PM<sub>2.5</sub> emissions, to the extent these features and measures have co-benefits in the form of quantifiable GHG emissions reductions. The project applicant shall be required to implement a combination of measures identified in Section B below, or co-benefits of NO<sub>x</sub> and PM<sub>2.5</sub> emissions reduction measures required under AB 987, to achieve any remaining GHG emission reductions beyond those identified in (i) and (ii) above necessary to meet the no net new GHG emissions threshold over the 30-year operational life of the Project.
  - A. Required GHG Reduction Measures.
    - a. Minimize energy demand, including electricity and natural gas demand through implementation of LEED Gold certification design features.
    - b. Implement a transportation demand management (TDM) program that includes the following, subject to further refinement and revision through coordination between the City and the project applicant at the time of project approval:
      - i. TDM 1 – Encourage Alternative Modes of Transportation (Rail, Public Bus, and Vanpool). The IBEC Project shall encourage alternative modes of transportation use by providing monetary incentives and bus stop improvements near the Project Site such as, but not limited to:
        - Integrated event and transit ticketing to enable seamless connections and provide event-day travel updates.
        - Discounted event tickets with the purchase of a transit pass or providing proof of a registered TAP card (the regional fare payment method).
        - Giveaways for transit users (goods for attendees, free tickets for employees, etc.).

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- Rewards/gamification opportunities for fans to compete for prizes or points based on their transportation choices.
  - Bus stop facilities improvements: the IBEC Project shall provide on-site and/or off-site improvements such as lighting, new benches and overhead canopies, added bench capacity if needed, and real-time arrival information for an improved user experience for bus stops that are relocated as a result of the IBEC Project.
  - Transit and/or Multi-Modal Subsidy: the IBEC Project shall provide pre-tax commuter benefits for employees.
  - Vanpool Subsidy: This shall provide pre-tax commuter benefits for employees.
  - Marketing and outreach campaign to event attendees and employees for transit usage.
- ii. TDM 2 – Event-day Dedicated Shuttle Services
- The following shall be provided to ensure sufficient connectivity to existing and planned Metro Rail Stations:
- The IBEC Project shall provide dedicated shuttle service from the Green Line at Hawthorne Station, Crenshaw/LAX Line at AMC/96th Station, and Crenshaw/LAX Line at La Brea/Florence (Downtown Inglewood) Stations for Arena events. This shuttle service shall be a dedicated event-day shuttle service from the venue for employees and attendees.
  - The IBEC Project shall provide no less than 27 shuttles with a capacity of no less than 45 persons per shuttle to accommodate employees and attendees traveling to and from the Project Site. Due to the arrival and departure of employees prior to and after the attendees, respectively, the same shuttles shall be utilized for the employees. Shuttle service shall begin no less than two hours before the event and extend to at least 30 minutes after the start of the event. After the event, shuttle service shall begin no less than 30 minutes before the end of the event and shall continue for at least one hour after the end of the event.
  - The IBEC Project shall implement Mitigation Measure [ REF MM3\_14\_2b \h \\* MERGEFORMAT ], requiring the IBEC operator to provide enough shuttles to ensure that there is successful and convenient connectivity with short wait times to these light rail stations. To this end, the project applicant shall monitor the number of people using shuttles to travel between the above light rail stations and the IBEC. If the monitoring shows that peak wait times before or after major events exceeds 15 minutes, then the project applicant shall add sufficient additional shuttle capacity to reduce wait times to meet this target. The aim is to require increased shuttle runs as necessary to make sure that demand is accommodated within a reasonable amount of time and to encourage use of transit.
  - The IBEC Project shall provide a convenient and safe location on site for shuttle pick-up and drop-off on the east side of South Prairie Avenue, approximately 250 feet south of West Century Boulevard. The drop-off location shall be adjacent to the Arena so that shuttle users would not need to cross South Prairie Avenue to arrive at the Arena. The IBEC Project shall implement Mitigation Measure [ REF MM3\_14\_3f\h \\* MERGEFORMAT ], which requires constructing a dedicated northbound right-turn lane that

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would extend from the bus pull-out on the east side of South Prairie Avenue to West Century Boulevard.

- iii. TDM 3 – Encourage Carpools and Zero-Emission Vehicles  
The IBEC Project shall provide incentives to encourage carpooling and zero-emission vehicles as a means for sharing access to and from the Project Site. The incentives shall include:
- Incentives for carpools or zero-emission vehicles, including preferential parking with the number of parking spots in excess of applicable requirements, reduced parking costs, discounted rides (or other, similar benefits) to incentivize sharing/pooling for attendees using transportation network company (TNC) rides to or from an event, or other discounts/benefits.
  - Variable parking price based on car occupancy - structured to encourage carpooling.
  - 8 percent of parking spaces with electrical vehicle charging stations in excess of the minimum requirement of 6 percent (i.e., a minimum of three hundred and thirty (330) electric vehicle charging stations (EVCS) shall be installed within the three proposed on-site parking garages serving the Project for use by employees, visitors, event attendees, and the public).
- iv. TDM 4 – Encourage Active Transportation  
The IBEC Project shall include features that would enhance the access for bicyclists and pedestrians, including the following:
- Bicycle parking in excess of applicable code requirements as follows: 60 employee bike parking spaces and 23 attendee bike parking spaces.
  - Showers and lockers for employees.
  - A bike valet service if needed to accommodate bike parking space needs.
  - A bicycle repair station where bicycle maintenance tools and supplies are readily available on a permanent basis and offered in good condition.
  - Coordination of bike pools and walk pools.
  - Sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities and throughout the development.
- v. TDM 5 – Employee Vanpool Program  
The IBEC Project shall provide an employee vanpool program to accommodate up to 66 employees utilizing the vanpool service. Each vanpool shall have a capacity of at least 15 persons per vehicle. The vanpool program shall be in conjunction with a vanpool subsidy providing pre-tax commuter benefits for employees as indicated in TDM 1.
- vi. TDM 6 – Park-n-Ride Program  
The IBEC Project shall provide a regional park-n-ride program that utilizes charter coach buses with a capacity of no less than 45 persons per bus. Parking lot locations shall correspond to zip code ticket purchase data, and the site circulation shall be designed to account for the charter coaches.
- vii. TDM 7 – Information Services  
The IBEC Project shall provide services to inform the public about activities at the IBEC, including the following:
- Strategic Multi-modal Signage/Wayfinding
  - Real-time travel information; Changeable Message Sign (CMS) and social media
  - Welcome packets for new employees and ongoing marketing



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- Commercials/Advertisement - Television, Website, Social Media, Radio, etc.
  - Information kiosk or bulletin board providing information about public transportation options.
- viii. TDM 8 – Reduce On-Site Parking Demand  
The IBEC Project shall include features that reduce on-site parking demand. These features shall include:
- Provide coach bus/minibus/microtransit staging and parking areas: the IBEC Project is designed to accommodate 20 minibus/microtransit/paratransit parking spaces and 23 charter coach bus spaces. The capacity for minibus/microtransit/paratransit shall be no less than 10 persons per vehicle.
  - Allocate sufficient TNC staging spaces: the IBEC Project shall be designed to accommodate approximately 160 spaces for TNC staging.
- ix. TDM 9 – Event Day Local Microtransit Service  
The IBEC Project shall provide a local minibus/microtransit service for all event days with a service range of approximately 6 miles surrounding the Project Site. Each minibus shall have a capacity of no less than 10 persons per vehicle and shall provide service to employees and event attendees.
- x. Monitoring  
The TDM Program shall include an ongoing program to monitor each of the TDM Program elements listed above. The monitoring program shall collect data on the implementation of each specific TDM strategy and shall assess the extent to which the TDM Program is meeting demand for alternative forms of transportation and reducing vehicle trips and reliance on private automobiles. The information obtained through this monitoring program shall be provided to the City Traffic Engineer on an annual basis.
- c. A monitoring report shall be prepared not less than once each year. The report shall evaluate the extent to which the TDM Program encourages employees to reduce single-occupancy vehicle trips and to use other modes of transportation besides automobile to travel to basketball games and other events hosted at the Project. 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.
- d. The TDM Program 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.
- e. Install "smart parking" systems in the on-site parking garages serving the Project to reduce vehicle circulation and idle time within the structures by more efficiently directing vehicles to available parking spaces.
- B. Potential Additional GHG Reduction Measures  
The GHG Reduction Plan shall identify and quantify any additional GHG reduction measures proposed by the project applicant to reduce incremental emissions to below the net zero threshold. These additional measures may include one or more of the following:
- a. Potential on-site measures:
- i. Installation of additional photovoltaic systems as carports on the Eastern Parking Garage.
  - ii. Purchase of energy for on-site consumption through the Southern California Edison (SCE) Green Rate, which facilitates SCE's purchase of renewable energy

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- to meet the needs of Green rate participants from solar renewable developers within the SCE service territory or similar opportunities for renewable electricity that may arise in the future.
- iii. If available after approval by applicable regulatory agencies, on-site use of renewable natural gas.
  - iv. Implementation of a waste diversion program with a goal of reducing landfill waste to zero.
- b. Potential off-site measures:
- i. Carbon offset credits. The project applicant may purchase carbon offset credits that meet the requirements of this paragraph. Carbon offset credits must be verified by an approved registry. An approved registry is an entity approved by CARB to act as an “offset project registry” to help administer parts of the Compliance Offset Program under CARB’s Cap and Trade Regulation. Carbon offset credits shall be permanent, additional, quantifiable, and enforceable.
  - ii. Transit and City Fleet Vehicles Replacement. The project applicant may enter into an agreement to cover replacement costs of existing City municipal fleet and transit vehicles with Zero Emissions Vehicles (ZEVs) and install related Electric Vehicle Charging Stations (EVCS).
  - iii. Local EV Charging Stations. The project applicant may enter into agreements to install EVCS locations in the City for use by the public.
  - iv. The project applicant may develop or enter into partnership with other organizations to develop a tree planting program in the City.
  - v. EV Home Charger Program. The project applicant may implement a program to cover 100 percent of the costs of purchasing and installing EV chargers for residential use in local communities near the Project Site.

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 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.

**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 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.

If an Annual GHG Verification Report determines that the Project’s emissions for the previous year were lower than necessary to achieve net zero GHG emissions, credit for any emissions reductions achieved below net zero shall be applied to the next year in the following Annual GHG Verification Report. The Annual GHG Verification Report shall be verified by a qualified, independent expert entity retained at the project applicant’s expense. GHG offset credits to achieve net zero GHG emissions for the previous year, if necessary, shall have been purchased by the end of each reporting year.

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Following completion and verification of the Annual GHG Verification Report, the GHG Reduction Plan shall be refined as may be needed in order to maintain emissions below net zero over the next reporting year. Any such revisions shall be prepared by the qualified expert retained by the project applicant and shall be subject to review and approval by the City.

In reviewing the GHG Reduction Plan, any revisions to that plan, or other reports related to implementation of the Plan, the City may retain a qualified expert to assist with this review. The selection of such an expert shall be at the City's discretion. Any expenses incurred by the City in retaining this expert shall be borne by the project applicant.

The provisions of this Mitigation Measure 3.7-1(b) may be consolidated with the reporting obligations pursuant to AB 987, as memorialized in the conditions of approval to the Project, into a single GHG reduction monitoring and verification report.

**Basis for Finding:** 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**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

## **F. Hazards and Hazardous Materials**

**1. Impact 3.8-4: Construction and operation of the Proposed Project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, could have the potential to create a significant hazard to the public or the environment. (Refer to pages 3.8-39 through 3.6-44 of the Draft EIR.)**

**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

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approved by the 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 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 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 to recommence within any such areas. The project applicant shall submit the “no further action” letter or 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.

**Basis for Finding:** With the implementation of Mitigation Measure 3.8-4, the Proposed Project would not create a significant hazard to the public or the environment as a result of exposure to existing contamination or hazardous release sites. Thus, this impact would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**2. Impact 3.8-5: Construction and operation of the Proposed Project would be located within an airport land use plan area and could result in a safety hazard or excessive noise for people residing or working in the project area or could create a hazard to navigable airspace and/or operations at a public airport. (Refer to pages 3.8-44 through 3.6-48 of the Draft EIR.)**

**Mitigation Measure 3.8-5:** The project applicant shall submit an application to the Airport Land Use Commission (ALUC) for a determination that the Project is consistent with the Airport Land Use Plan. The project applicant shall submit Form 7460 1, “Notice of Proposed Construction or Alteration,” to the Federal Aviation Administration (FAA) or notify the FAA through the Obstacle Evaluation/Airport Airspace Analysis system, consistent with the requirements of 14 Code of Federal Regulations (CFR) Part 77, prompting completion of an aeronautical study to determine whether the Project would constitute a

hazard to air navigation. A copy of the 14 CFR Part 77 notification shall be included in the compatibility review application for the Project.

Prior to the issuance of building permits, the project applicant shall provide the City with a copy of the ALUC-issued consistency determination, and the FAA-issued “Determination of No Hazard to Air Navigation.” The project applicant shall implement all recommendations made by the FAA, including those for marking and lighting of project components that are determined to constitute obstructions in federal airspace, and any requirements set forth in the ALUC consistency determination regarding height restrictions.

**Basis for Finding:** With the implementation of Mitigation Measure 3.8-5, the Proposed Project would not create a hazard to air navigation as a result of the penetration of imaginary airspace surfaces or obstacle clearance surfaces, and would not be inconsistent with the ALUP. Thus, this impact would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

## **G. Hydrology and Water Quality**

**1. Impact 3.9-1: Construction and operation of the Proposed Project could have the potential to violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality, or conflict with or obstruct implementation of a water quality control plan. (Refer to pages 3.9-21 through 3.9-24 of the Draft EIR.)**

**Mitigation Measure 3.9-1(a):** Comply with Applicable Regulations as approved by the City and the Los Angeles RWQCB. The project applicant shall comply with the MS4 permit regulations, NPDES General Construction Permit, Inglewood Municipal Code regulations, the County’s LID Standards Manual, and the USGBC’s LEED program. A LID Report and SWPPP shall be prepared to the satisfaction of the City and Los Angeles RWQCB to ensure the prevention of substantial water quality degradation during construction and operation of the Project. These plans shall be approved by the City and Los Angeles RWQCB to confirm that these permit and regulatory requirements have been satisfied before construction commences on the site.

**Mitigation Measure 3.9-1(b):** Sweeping. Operation of the Project shall include periodic sweeping to remove oil, grease, and debris from parking lots of 25 spaces or more. Such sweeping shall occur not less than weekly.

**Basis for Finding:** With the implementation of Mitigation Measures 3.9-1(a), the Proposed Project would comply with applicable regulations as approved by the City and the Los Angeles RWQCB and would not result in an impact to water quality. With implementation of Mitigation Measure 3.9-1(b), the Proposed Project would be consistent with the City’s General Plan Storm Drains and Waste Water Policy 2. Thus, this would be a **less-than-significant impact**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**2. Impact 3.9-3: Construction and operation of the Proposed Project could have the potential to substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which has the potential to: result in substantial erosion or siltation on or off site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flow. (Refer to pages 3.9-26 through 3.9-31 of the Draft EIR.)**

**Mitigation Measure 3.9-3:** Implement Mitigation Measure 3.9-1(a) and 3.9-1(b) (Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB and Sweeping).

**Basis for Finding:** With the implementation of Mitigation Measure 3.9-3, construction of the Proposed Project would comply with applicable regulations as approved by the City and the Los Angeles RWQCB and would not result in a significant impact related to alteration of the existing drainage pattern of the site. Thus, this impact would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**3. Impact 3.9-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development within the Dominguez Channel Watershed, could have the potential to cumulatively violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality or conflict with or obstruct implementation of a water quality control plan. (Refer to pages 3.9-31 through 3.9-32 of the Draft EIR.)**

**Mitigation Measure 3.9-4:** Implement Mitigation Measure 3.9-1(a) and 3.9-1(b) (Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB and Sweeping).

**Basis for Finding:** With the implementation of Mitigation Measures 3.9-4, the Proposed Project would comply with applicable regulations as approved by the City and the Los Angeles RWQCB, would be consistent with the City's General Plan Storm Drains and Waste Water Policy 2, and, therefore, would not result in an impact to water quality. Thus, the Proposed Project would not have a considerable contribution to a cumulative impact and would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**4. Impact 3.9-6: Construction and operation of the Proposed Project, in conjunction with other cumulative development in the Dominguez Channel Watershed, could have the potential to cumulatively alter the drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flow. (Refer to pages 3.9-33 through 3.9-34 of the Draft EIR.)**

**Mitigation Measure 3.9-6:** Implement Mitigation Measure 3.9-1(a) and 3.9-1(b) (Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB and Sweeping).

**Basis for Finding:** With the implementation of Mitigation Measures 3.9-6, construction of the Proposed Project would comply with applicable regulations as approved by the City and the Los Angeles RWQCB and would not result in a significant impact related to alteration of the existing drainage pattern of the site. Thus, the Proposed Project would not have a considerable contribution to a cumulative impact, and would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

## **H. Transportation and Circulation**

1. **Impact 3.14-13: The Proposed Project could have the potential to adversely affect existing or planned pedestrian facilities, or fail to adequately provide for access by pedestrians. (Refer to pages 3.14-248 through 3.14-249 of the Draft EIR.)**

**Mitigation Measure 3.14-13:** The project applicant shall widen the east leg crosswalk across West Century Boulevard at South Prairie Avenue to 20 feet.

**Basis for Finding:** The widened crosswalk would provide sufficient capacity for the anticipated pedestrian flows. The impact would be mitigated to **less than significant**.

The widened crosswalk may also encourage more pedestrians destined to/from the parking areas in the northeast part of Hollywood Park to use the north sidewalk along West Century Boulevard rather than the south sidewalk, which would improve conditions for pedestrians using the south sidewalk to walk to/from the East Transportation Center and Garage.

This mitigation measure would not be required if the West Century Boulevard Pedestrian Bridge Project Variant is constructed. Under this condition, pedestrian travel in this crosswalk should be prohibited during the pre-event and post-event peak periods.

Cumulative impacts are also considered less than significant as the cumulative projects would not add a significant number of pedestrians to the analyzed sidewalk and crosswalk facilities near the Proposed Project. Mitigation Measure 3.14-13 would ensure that any cumulative pedestrian impacts would also be less than significant with mitigation.

Impacts under a concurrent event scenario, with major events at the Proposed Project occurring concurrently or overlapping with events at The Forum and/or the NFL Stadium, are also considered less than significant as the anticipated pedestrian flows would not add a significant number of pedestrians (beyond conditions analyzed under the Adjusted Baseline Plus Project Major Event Scenario) to the analyzed sidewalk and crosswalk facilities near the Proposed Project analyzed during the pre-event and post-event peak hours. It is anticipated that events at The Forum would generate relatively few added pedestrians near the Proposed Project given their physical distance from one another and availability of parking on-site at The Forum. It is anticipated that pedestrians attending events at the NFL Stadium would primarily utilize the HPSP internal pedestrian network if they park on-site. Alternately, they would utilize pedestrian facilities beyond the limits of the pedestrian study area for the Proposed Project if they parked off-site and relied on shuttles to access the NFL Stadium. As such, under a concurrent event

scenario, those impacts would not combine to adversely affect existing or planned pedestrian facilities near the Proposed Project or fail to adequately provide for pedestrian access; heavier volumes of traffic on concurrent event days would not result in inadequate pedestrian access in the vicinity of the Proposed Project.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**2. Impact 3.14-14: The Proposed Project could have the potential to result in inadequate emergency access under Adjusted Baseline conditions. (Refer to pages 3.14-249 through 3.14-251 of the Draft EIR.)**

**Mitigation Measure 3.14-14:** The project applicant shall work with the City and the Centinela Hospital Medical Center (CHMC) to develop and implement a Local Hospital Access Plan that would maintain reasonable access to the hospital by emergency and private vehicles accessing the CHMC emergency room. Measures to be included in the plan could include, but may not be limited to, the following:

- a) Development of a wayfinding program that consists of the following:  
Placement of signage (e.g., blank-out signs, changeable message signs, permanent hospital alternate route signs, etc.) on key arterials that may provide fixed alternate route guidance as well as real-time information regarding major events. This program would benefit from the project financial contribution to the City's ITS program (see Mitigation Measure 3.14 2(o)) by including cameras, vehicle queue spillback detection loops on eastbound West Century Boulevard, and other technologies which, if implemented, could enable the wayfinding signs to be automatically illuminated when necessary.
- b) Coordination with CHMC regarding updates to their website and any mobile apps so that employees, visitors, and patients visiting those sites are provided with advanced information of when events are scheduled.
- c) Provide direction to TCOs regarding best practices for accommodating emergency vehicles present in congested conditions during pre-event and post-event conditions.

The Local Hospital Access Plan shall consider, develop, and implement solutions to address potential access restrictions caused by construction activity at the Project (see Impact 3.14-15). The Plan shall have a monitoring and coordination component including observations of accessibility to the Emergency Department during periods when events are and are not being held at the Project. Coordination would include participation by the project applicant in quarterly working group meetings with hospital administrators to identify and address circulation concerns.

The Local Hospital Access Plan shall be reviewed by the City, the Police Department, Los Angeles County Fire Department, and approved by the City prior to the first event at the ~~Project arena~~.

**Basis for Finding:** The implementation of the above mitigation measure would ensure that adequate access to the local hospital would remain, even during arena events. Coordination with the CHMC and implementation of wayfinding technology would assist drivers and emergency vehicles to safely and quickly navigate to the CHMC, and the mitigation would reduce this impact to **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.



**3. Impact 3.14-26: The Proposed Project could have the potential to result in inadequate emergency access under cumulative conditions. (Refer to page 3.14-297 of the Draft EIR.)**

**Mitigation Measure 3.14-26:** Implement Mitigation Measure 3.14-14 (Local Hospital Access Plan).

**Basis for Finding:** The implementation of the above mitigation measure would ensure that adequate access to the local hospital would remain, even during arena events. Coordination with the CHMC and implementation of wayfinding technology would assist drivers and emergency vehicles to safely and quickly navigate to the CHMC, and the mitigation would reduce this impact to **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**I. Utilities and Service Systems**

**1. Impact 3.15-9: Construction and operation of the Proposed Project could have the potential to require or result in the relocation or construction of new or expanded storm water drainage facilities or expansion of existing facilities, the construction or relocation of which could have the potential to cause significant environmental effects. (Refer to pages 3.15-68 through 3.15-72 of the Draft EIR.)**

**Mitigation Measure 3.15-9:** Implement Mitigation Measure 3.9-1(a) (Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB).

**Basis for Finding:** With the implementation of Mitigation Measure 3.15-9, construction of the Proposed Project would comply with applicable regulations as approved by the City and the Los Angeles RWQCB that require preparation and implementation of an LID Plan and SWPPP. Thus, the effects of expansion of storm water drainage facilities would be reduced to insignificance. Thus, this impact would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

**2. Impact 3.15-10: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could have the potential to result in the relocation or construction of new storm water drainage facilities or expansion of existing facilities, the construction or relocation of which could have the potential to cause significant environmental effects. (Refer to pages 3.15-73 through 3.15-78 of the Draft EIR.)**

**Mitigation Measure 3.15-10:** Implement Mitigation Measure 3.9-1(a) (Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB).

**Basis for Finding:** With the implementation of Mitigation Measures 3.15-10, construction of the Proposed Project would comply with applicable regulations as approved by the City and the Los Angeles RWQCB and the expansion of storm water drainage facilities would not cause a significant environmental effect. Therefore, the Proposed Project with mitigation would not result in a considerable contribution to a potentially significant cumulative impact. Thus, this cumulative impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Impacts would be reduced to less than significant.

## **Section IV. Significant and Unavoidable Impacts**

The following significant and potentially significant environmental impacts of the Project, including cumulative impacts, are unavoidable and cannot be mitigated in a manner that would substantially lessen the significant impact. Notwithstanding disclosure of these impacts, the City Council elects to approve the Project due to overriding considerations as set forth below in Section F, the statement of overriding considerations.

### **A. Air Quality**

**1. Impact 3.2-1: Construction and operation of the Proposed Project would conflict with implementation of the applicable air quality plan. (Refer to pages 3.2-65 through 3.1-73 of the Draft EIR.)**

**Mitigation Measure 3.2-1(a):** Implement Mitigation Measure 3.14-2(b). Implementation of a comprehensive Transportation Demand Management (TDM) program.

**Mitigation Measure 3.2-1(b):** Implement Mitigation Measure 3.2-2(b). Emergency Generator and Fire Pump Generator Maintenance & Testing.

**Mitigation Measure 3.2-1(c):** Implement Mitigation Measure 3.2-2(c). Construction Emissions Minimization Plan.

**Mitigation Measure 3.2-1(d):** Implement Mitigation Measure 3.2-2(d). Incentives for vendors and material delivery trucks to use ZE or NZE trucks during operation.

**Basis for Finding:** Because regional emissions during construction and operation of the Proposed Project would exceed the significance thresholds for those criteria air pollutants for which the Air Basin is not in attainment (i.e., VOC, NOX, PM<sub>10</sub>, and PM<sub>2.5</sub>), the Proposed Project would have a significant impact regarding consistency with the AQMP.

Regarding construction emissions, the Applicant has agreed to use off-road diesel-powered construction equipment that meets or exceeds CARB and US EPA Tier 4 Final off-road emissions standards or equivalent for all equipment rated at 50 hp or greater. Such equipment will be outfitted with BACT devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters. Based on registration data, over 75 percent of heavy-duty diesel vehicles (i.e., vendor and haul trucks) in the State are model year 2010 or newer.

**Comment [U2]:** Minor point, global change for consistency.

All construction equipment and vehicles shall maintain compliance with the manufacturer's recommended maintenance schedule and the Applicant will maintain maintenance records. The Applicant will strive to use ZE or NZE heavy-duty haul trucks during construction, and no idling signs will be posted upon entry and throughout the Project Site during construction. In addition, the project applicant will restrict vehicle idling time to no longer than five minutes and will post signs at the entrance and throughout the site stating that idling longer than five minutes is not permitted. Even with implementation of Project Design Feature 3.2.1 and Mitigation Measure 3.2.1(c), construction-related daily emissions

would exceed the SCAQMD significance threshold for NOX. Therefore, short-term regional construction emissions would be considered significant and unavoidable.

Regarding operational emissions, feasible mitigation in line with the VMT-reduction targets of the AQMP and the City's ECAP to reduce regional emissions during operation of the Proposed Project have been developed. Implementation of Mitigation Measure 3.2.1 would require the implementation of Mitigation Measure 3.14-2(b), which involves the implementation of a TDM program, consistent with the transportation strategies noted in the 2016 RTP/SCS. In particular, the TDM program would be designed to provide transportation services and incentives that encourage and support the use by employees, event attendees and customers of alternative modes of transportation and the reduction of vehicle trips, including by increasing average vehicle occupancy. The Proposed Project TDM program would include a variety of components, including programs to encourage alternative modes of transportation (rail, public bus, and vanpool), including event-day dedicated shuttle services; programs to encourage carpools and ZEV vehicles, active transportation, employee vanpools, a park-n-ride program, and information services; and programs to reduce on-site parking demand, including event-day local microtransit service.

As demonstrated in Appendix K, the TDM program would result in a reduction of vehicle trips. Potential trip reductions are based on estimates of vehicle trips for LA Clippers home basketball games and other non-NBA basketball game events to be hosted at the Project Site, as well as LA Clippers employees who will use the LA Clippers practice and training facility and the LA Clippers offices, and vehicle trips by employees and patrons of the sports medicine clinic, retail, restaurant, community space and hotel uses included at the Project Site. The TDM program would be designed to achieve and maintain a reduction in the number of vehicle trips, on an annual basis, by attendees, employees, visitors, and customers as compared to trips generated by Project operations absent the TDM program. The implementation of this mitigation measure would reduce single-occupancy vehicle trips and encourage the use of other modes of transportation besides automobiles, thereby reducing Project-related emissions during operation of the Proposed Project. However, as the timing and efficacy of these measures cannot be determined with certainty at this time, the regional operational emissions would continue to exceed the significance thresholds for those criteria air pollutants and precursors for which the Air Basin is not in attainment (i.e., VOC, NOX, PM<sub>10</sub>, and PM<sub>2.5</sub>). As such, even with implementation of Mitigation Measure 3.14-2(b), the Proposed Project would not be consistent with the control strategies in the AQMPs.

The Applicant has agreed to conduct maintenance and/or testing on the emergency generators or fire pump generators on three separate non-event days. Each emergency generator shall be tested on a separate non-event day and the two fire pump generators may be tested together on a separate non-event day. As shown in Table 3.2.24, below, NOX emissions during operations would be reduced to less-than-significant levels during Non-Event days. However, VOC, NOX, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions would remain in excess of the SCAQMD significance thresholds on certain Event days. In addition, the Applicant has agreed to provide incentives to vendor delivery trucks that use ZEV or NVE trucks during project operations. As previously stated, registration data indicates over 75 percent of heavy-duty diesel vehicles (i.e., vendor and haul trucks) in the state are model year 2010 or newer. Thus, there are no additional feasible mitigation strategies to further reduce the maximum daily regional emissions of VOC, NOX, PM<sub>10</sub>, and PM<sub>2.5</sub> during operations and the Proposed Project would continue to be above the SCAQMD regional significance thresholds and impacts would be significant and unavoidable.

The Proposed Project would be consistent with the air quality related policies in the City's General Plan and ECAP. However, even with implementation of all feasible mitigation, regional Proposed Project emissions of nonattainment pollutants would remain in excess of applicable thresholds, and this impact would be considered significant and unavoidable.

For additional information concerning the use of ZE and NZE construction equipment, trucks and shuttles, please see Responses to Comments SCAQMD3-5, SCAQMD3-14, SCAQMD3-15, SCAQMD3-19, NRDC-9, and Ray Gorski, *Inglewood Basketball & Entertainment Center Draft EIR: Review of Suggested Mitigation Measures*, May, 2020.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**2. Impact 3.2-2: Construction and operation of the Proposed Project would result in a cumulatively considerable net increase in NO<sub>x</sub> emissions during construction, and a cumulatively considerable net increase in VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions during operation of the Proposed Project. (Refer to pages 3.2-73 through 3.1-90 of the EIR.)**

**Mitigation Measure 3.2-2(a):** Implement Mitigation Measure 3.14-2(b).

**Mitigation Measure 3.2-2(b):** Emergency Generator and Fire Pump Generator Maintenance & Testing. The Applicant shall conduct maintenance and/or testing of the emergency generators or fire pump generators on three separate non-event days. Each emergency generator shall be tested on a separate non-event day and the two fire pump generators may be tested together on a separate non-event day.

**Mitigation Measure 3.2-2(c):** The project applicant shall prepare and implement a Construction Emissions Minimization Plan. 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 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.
- 3) The project applicant shall require, at a minimum, that operators of heavy-duty haul trucks visiting the Project during construction commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 grams per brake horsepower-hour (g/bhp-hr) for particulate matter (PM) and 0.20 g/bhp-hr of NO<sub>x</sub> emissions or newer, cleaner trucks. In addition, the project applicant

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shall strive to use zero-emission (ZE) or near-zero-emission (NZE) heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional NO<sub>x</sub> emissions standard of 0.02 g/bhp-hr. Contractors shall be required to maintain records of all trucks visiting the Project, and such records shall be made available to the City upon request.

- 4) The project applicant shall ensure all construction equipment and vehicles are in compliance with the manufacturer's recommended maintenance schedule. The project applicant shall maintain maintenance records for the construction phase of the Project and all maintenance records shall remain on site for a period of at least 2 years from completion of construction.
- 5) The project applicant shall enter into a contract that notifies all construction vendors and contractors that vehicle idling time will be limited to no longer than 5 minutes or another timeframe as allowed by California Code of Regulations Title 13, section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, unless exempted by this regulation. For any vehicle that is expected to idle longer than 5 minutes, the project applicant shall require the vehicle's operator to shut off the engine. Signs shall be posted at the entrance and throughout the site stating that idling longer than 5 minutes is not permitted.

**Mitigation Measure 3.2-2(d):** The project applicant shall provide incentives for vendors and material delivery trucks that would be visiting the Project to encourage the use of ZE or NZE trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NO<sub>x</sub> emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, incentivize the use of 2010 model year delivery trucks.

**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.

**Basis for Finding:** The Applicant has agreed to use off-road diesel-powered construction equipment that meets or exceeds CARB and US EPA Tier 4 Final off-road emissions standards or equivalent for all equipment rated at 50 hp or greater. Based on registration data, over 75 percent of heavy-duty diesel vehicles (i.e., vendor and haul trucks) in the state are model year 2010 or newer. Even with implementation of Project Design Feature 3.2.1 and Mitigation Measure 3.2.1(c) discussed below, construction-related daily emissions would exceed the SCAQMD significance threshold for NO<sub>x</sub>. Therefore, short-term regional construction emissions would be significant and unavoidable.

With regard to regional operational emissions, under Mitigation Measure 3.2-2(a) the Proposed Project would implement Mitigation Measure 3.14-2(b), which would require the Proposed Project to develop a TDM program which would be designed to reduce vehicle trips by spectators, event-day staff, and employees through the use of alternate modes of transportation including public transit, shuttles, ridesharing, walking, and biking. The TDM program would be required to demonstrate a reduction in vehicle trips produced by the Proposed Project. Potential trip reductions are based on estimates of vehicle trips for LA Clippers home basketball games and other non-NBA basketball game events to be hosted at the Project Site, as well as LA Clippers employees who would use the LA Clippers practice and training facility and the LA Clippers offices, and vehicle trips by employees and patrons of the sports medicine clinic, retail, restaurant, community space, and hotel uses included at the Project Site. The TDM program would be designed to reduce single-occupancy vehicle trips and to use other modes of transportation besides automobile to travel to basketball games and other events hosted at the Proposed Project. The implementation of this mitigation measure would serve to further reduce mobile emissions during operation of the Proposed Project, as well as any negligible related health effects. Because the efficacy of these measures to reduce trips cannot be determined with certainty at this time, maximum daily regional

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emissions of VOC, NOX, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions during operation of the Proposed Project would continue to be above the SCAQMD regional significance thresholds and impacts would be significant and unavoidable.

As shown in Table 3.2-24, on page 3.2-90 of the Draft EIR, with Mitigation Measure 3.3-2(b), NOX emissions during operations would be reduced to less-than-significant levels during Non-Event days. However, VOC, NOX, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions would remain in excess of the SCAQMD significance thresholds on certain event days, therefore impacts would be significant and unavoidable.

With Mitigation Measure 3.3-2(c), the Applicant has agreed to use off-road diesel-powered construction equipment that meets or exceeds CARB and US EPA Tier 4 Final off-road emissions standards or equivalent for all equipment rated at 50 hp or greater, will strive to use ZE or NZE heavy-duty haul trucks during construction, and no idling signs will be posted upon entry and throughout the Project Site during construction. Based on registration data, over 75 percent of heavy-duty diesel vehicles (i.e., vendor and haul trucks) in the state are model year 2010 or newer. Thus, there are no additional feasible mitigation strategies to further reduce the maximum daily regional emissions of VOC, NOX, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> during construction and the Proposed Project would continue to be above the SCAQMD regional significance thresholds and impacts would be significant and unavoidable.

With Mitigation Measure 3.3-2(d), the Applicant has agreed to provide incentives to vendor delivery trucks that use ZE or NZE trucks during project operations. Based on registration data, over 75 percent of heavy-duty diesel vehicles (i.e., vendor and haul trucks) in the state are model year 2010 or newer. Thus, there are no additional feasible mitigation strategies to further reduce the maximum daily regional emissions of VOC, NOX, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> during operations and the Proposed Project would continue to be above the SCAQMD regional significance thresholds and impacts would be significant and unavoidable.

For additional information concerning the use of ZE and NZE construction equipment, trucks and shuttles, please see Responses to Comments SCAQMD3-5, SCAQMD3-14, SCAQMD3-15, SCAQMD3-19, NRDC-9, and Ray Gorski, *Inglewood Basketball & Entertainment Center Draft EIR: Review of Suggested Mitigation Measures*, May, 2020.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**3. Impact 3.2-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development, would result in inconsistencies with implementation of applicable air quality plans. (Refer to pages 3.2-104 through 3.1-105 of the Draft EIR.)**

**Mitigation Measure 3.2-5(a):** Implement Mitigation Measure 3.14 2(b). Implementation of a comprehensive Transportation Demand Management (TDM) program.

**Mitigation Measure 3.2-5(b):** Implement Mitigation Measure 3.2-2(b). Emergency Generator and Fire Pump Generator Maintenance & Testing.

**Mitigation Measure 3.2-5(c):** Implement Mitigation Measure 3.2-2(c). Construction Emissions Minimization Plan.

**Mitigation Measure 3.2-5(d):** Implement Mitigation Measure 3.2-2(d). Incentives for vendors and material delivery trucks to use ZE or NZE trucks during operation.

**Basis for Finding:** Because Proposed Project regional emissions during construction and operations would exceed the significance thresholds for those criteria air pollutants for which the Air Basin is not in attainment (i.e., VOC, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>), the Proposed Project would have a considerable contribution to a significant cumulative inconsistency with the AQMPs. As discussed above, the Proposed Project would implement Mitigation Measures 3.2-5(a-d), which would require the project applicant to use off-road diesel-powered construction equipment that meets or exceeds the CARB and US EPA Tier 4 Final off-road emissions standards or equivalent for all equipment rated at 50 hp or greater and implement a Construction Emissions Minimization Plan during project construction.

Implementation of a TDM program would serve to reduce Project-related mobile emissions during operation of the Proposed Project. Maintenance and/or testing of emergency generators or fire pump generators will be conducted on three separate non-event days. Each emergency generator shall be tested on a separate non-event day and the two fire pump generators may be tested together on a separate non-event day. As demonstrated in Table 3.2-24, NO<sub>x</sub> emissions during operations would be reduced to less-than-significant levels during Non-Event days. However, VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions would remain in excess of the SCAQMD significance thresholds on certain event days. In addition, the Applicant has agreed to provide incentives to vendor delivery trucks that use ZE or NZE trucks during project operations. As previously stated, registration data indicates over 75 percent of heavy-duty diesel vehicles (i.e., vendor and haul trucks) in the state are model year 2010 or newer. Thus, there are no additional feasible mitigation strategies to further reduce the regional emissions generated during operation of the Proposed Project, based on the above, construction and operation of the Proposed Project would contribute to a significant and unavoidable cumulative impact as it relates to consistency with the applicable air quality plan.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**4. Impact 3.2-6: Construction and operation Proposed Project, in conjunction with other cumulative development, would result in cumulative increases in short-term (construction) and long-term (operational) emissions. (Refer to pages 3.2-105 through 3.1-106 of the Draft EIR.)**

**Mitigation Measure 3.2-6(a):** Implement Mitigation Measure 3.14 2(b). Implementation of a comprehensive Transportation Demand Management (TDM) program.

**Mitigation Measure 3.2-6(b):** Implement Mitigation Measure 3.2-2(b). Emergency Generator and Fire Pump Generator Maintenance & Testing.

**Mitigation Measure 3.2-6(c):** Implement Mitigation Measure 3.2-2(c). Prepare and implement a Construction Emissions Minimization Plan.

**Mitigation Measure 3.2-6(d):** Implement Mitigation Measure 3.2-2(d). Incentivize use of ZE or NZE trucks.

**Basis for Finding:** As discussed above under Mitigation Measure 3.2-2(c), there would be no feasible mitigation measures to further reduce NO<sub>x</sub> emissions during construction. Thus, consistent with SCAQMD guidance, the Proposed Project NO<sub>x</sub> emissions during construction of the Proposed Project would be cumulatively considerable, resulting in a significant and unavoidable cumulative impact.

Implementation of Mitigation Measure 3.14-2(b) would reduce regional and localized emissions for all pollutants during operation of the Proposed Project. However, even after implementation of the required TDM Program, emissions are predicted to remain in excess of applicable thresholds. Thus, consistent with SCAQMD recommendations, the Proposed Project contribution to VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions during operation of the Proposed Project would remain cumulatively considerable, resulting in a significant and unavoidable cumulative impact.

As shown in Table 3.2-24, on page 3.2-90 of the Draft EIR, NO<sub>x</sub> emissions during operations would be reduced to less-than-significant levels during Non-Event days. However, VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions would remain in excess of the SCAQMD significance thresholds on certain event days, therefore cumulative impacts would be significant and unavoidable.

As discussed above under Mitigation Measure 3.2-2(c), there would be no feasible mitigation measure to further reduce the maximum daily regional emissions of NO<sub>x</sub> during construction and the Proposed Project would cumulatively be above the SCAQMD regional significance thresholds for NO<sub>x</sub>, and cumulative impacts would be significant and unavoidable.

The Applicant has agreed to provide incentives to vendor delivery trucks that use ZE or NZE trucks during project operations. Based on registration data, over 75 percent of heavy-duty diesel vehicles (i.e., vendor and haul trucks) in the state are model year 2010 or newer. Thus, there are no additional feasible mitigation strategies to further reduce the maximum daily regional emissions of VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> during operations and the Proposed Project would cumulatively be above the SCAQMD regional significance thresholds and cumulative impacts would be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

## **B. Noise and Vibration**



**1. Impact 3.11-1: Construction of the Proposed Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (Refer to pages 3.11-80 through 3.11-104 of the Draft EIR.)**

**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 Building Official. The Plan shall include the following elements:

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

The Community Affairs Liaison shall investigate, evaluate, and attempt to resolve noise complaints related to construction activities of the Proposed Project. The Community Affairs Liaison shall coordinate with a designated construction contractor representative to implement the following:

- 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.

**Comment [U3]:** This paragraph appears to have some stray strike-out notations.

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- 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.

**Basis for Finding:** Significant on-site construction noise levels would occur during daytime and nighttime construction, and off-site construction truck traffic would result in significant increases in traffic noise. Mitigation Measure 3.11-1 would reduce impacts by requiring a Construction Noise Reduction Plan.

Due to the lack of specificity of the construction plan at this point in time, the effectiveness of the noise-reduction techniques identified the mitigation measure, and the uncertainty of haul route designation and distribution of trucks, it is not practicable to calculate a numeric reduction in mitigated noise levels. The Proposed Project includes the installation of temporary and permanent sound walls, the most effective measure to reduce construction noise impacts, prior to commencement of heavy construction activity and reductions provided have been accounted for in the analysis. Although restrictions on equipment usage such as the number of equipment pieces that could operate simultaneously within the same area of the Project Site and restrictions on the number of heavy-duty construction trucks that can travel along the same roadways could potentially reduce impacts at noise-sensitive receptors, such restrictions are not considered feasible because these limitations could result in extension of the construction schedule that would expose noise-sensitive receptors to longer durations of construction activity, could affect safety during construction activities, and could interfere with achievement of project applicant Objective 1a. Therefore, these impacts would be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**2. Impact 3.11-2: Operation of the Proposed Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (Refer to pages 3.11-104 through 3.11-159 of the Draft EIR.)**

**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. 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.

The Operations Noise Reduction Plan shall include the following:

- Construct the permanent sound barriers included in the Project as project design features (as depicted on Figure 2-19 of the Draft EIR), or construction of permanent sound barriers that achieve an equivalent or better noise reduction as the permanent sound barriers proposed as project design features.
- Design and install noise generating mechanical equipment, such as emergency generators, transformers, and/or HVAC units so that such equipment will not cause exceedance of the ambient conditions by more than 3 dBA at any noise sensitive receptor by means of acoustical enclosures, silencers, barriers, relocation, and/or other noise-reducing approaches.
- Locate noise generating mechanical equipment at the furthest feasible distance from sensitive receptors.
- 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:
  - o Design the outdoor stage and sound amplification system (placement, directivity, orientation, number of speakers, and/or maximum volume) so as to limit noise levels near noise-sensitive receptors.
  - o Utilize sound-absorbing materials on the exterior of Plaza structures where appropriate and effective to reduce noise levels at adjacent off-site sensitive receptors.

**Mitigation Measure 3.11-2(b):** Implement Mitigation Measure 3.14 2(b) (Implementation of a comprehensive Transportation Demand Management (TDM) program).

**Basis for Finding:** 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. 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.

Significant increases in traffic noise would occur under the Major Event Weekday Post Event and the Mid-Size Event at NFL Stadium plus concert at The Forum plus Project Weekday Post Event conditions. Mitigation that could reduce impacts from on-road traffic along impacted segments includes the construction of sound walls along the roadway segments adjacent to noise-sensitive receptors. However, the Proposed Project does not have control over the public right-of-way or noise-sensitive receptors that could allow installation of sound walls. Therefore, installation of sound walls would not be feasible. Mitigation Measure 3.14-2(b) would require the implementation of a comprehensive TDM program that would reduce Project-related traffic. A reduction in Project-related traffic would result in reductions in traffic noise. The extent to which this measure would reduce trips along impacted segments is uncertain. Therefore, impacts would be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**3. Impact 3.11-3: Construction of the Proposed Project would generate excessive groundborne vibration levels. (Refer to pages 3.11-159 through 3.11-186 of the Draft EIR.)**

**Mitigation Measure 3.11-3(a):** Minimize Construction Equipment Vibration. To address potential structural damage impacts, the operation of construction equipment that generates high levels of vibration, such as vibratory rollers, large bulldozers/drill rigs and loaded trucks, shall occur no nearer than 20 feet from neighboring structures, if feasible.

**Mitigation Measure 3.11-3(b):** Vibration, Crack, and Line and Grade Monitoring Program. If vibratory rollers, large bulldozers or loaded trucks are required to operate within 20 feet of existing structures, implement a vibration, crack, and line and grade monitoring program at existing buildings located within 20 feet of demolition/construction activities. The following elements shall be included in this program:

- a) Pre-Demolition and Construction:
  - i. Photos of current conditions shall be included as part of the crack survey that the construction contractor will undertake. This includes photos of existing cracks and other material conditions present on or at the surveyed buildings. Images of interior conditions shall be included if possible. Photos in the report shall be labeled in detail and dated.
  - ii. The construction contractors shall identify representative cracks in the walls of existing buildings, if any, and install crack gauges on such walls of the buildings to measure changes in existing cracks during project activities. Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the project.
  - iii. The construction contractor shall determine the number and placement of vibration receptors at the affected buildings in consultation with a qualified architect. The number of units and their locations shall take into account proposed demolition and construction activities so that adequate measurements can be taken illustrating vibration levels during the course of the project, and if/when levels exceed the established threshold.
  - iv. A line and grade pre-construction survey at the affected buildings shall be conducted.
- b) During Demolition and Construction:
  - i. The construction contractor shall regularly inspect and photograph crack gauges, maintaining records of these inspections to be included in post-construction reporting.

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Gauges shall be inspected every two weeks, or more frequently during periods of active project actions in close proximity to crack monitors.

- ii. The construction contractor shall collect vibration data from receptors and report vibration levels to the City 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 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.
  - ii. The project applicant (and its construction contractor) shall be responsible for repairs from damage to buildings if damage is caused by vibration or movement during the demolition and/or construction activities. Repairs may be necessary to address, for example, cracks that expanded as a result of the project, physical damage visible in post-construction assessment, or holes or connection points that were needed for shoring or stabilization. Repairs shall be directly related to project impacts and will not apply to general rehabilitation or restoration activities of the buildings.

**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 around the project site, in adjacent public spaces, and in construction notifications. If the Community Affairs Liaison 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 vibration disturbances.

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 coordinate with a designated construction contractor representative to implement the following:

- 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:

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- 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.

**Basis for Finding:** The potential for building damage due to typical construction techniques such as those expected to be used in the construction of the Proposed Project is rare except in extreme cases such as blasting or pile driving. The potential structural response from vibration velocities generated by Proposed Project construction would include minor cosmetic damage for fragile buildings.<sup>3</sup> Buildings that would be impacted by Project construction with regard to potential structural damage are not designated as historic, therefore would not be considered “fragile”. With the implementation of Mitigation Measures 3.11-3(a) and 3.11-3(b), the Proposed Project would not result in the generation of excessive groundborne vibration levels exceeding structural damage thresholds during on-site construction activity, and any structural damage that may be created would be repaired. Thus, this impact with regard to structural damage would be considered less than significant.

Although vibration velocities may not be lowered by Mitigation Measure 3.11-3(c), annoyance would be addressed within 24 hours of complaint. Similar to structural damage mitigation, required setbacks for vibratory construction equipment from vibration sensitive receptors required under Mitigation Measures 3.11-3(a) and 3.11-3(b) would reduce vibration velocities. However, such restrictions on equipment usage would potentially result in delays in the construction schedule that would expose vibration-sensitive receptors to longer durations of construction activity, and thus may not be feasible to reduce the impact to insignificance. Therefore, impacts with regard to human annoyance would be considered significant and unavoidable.

As described above, heavy-duty construction truck travel along the designated haul route(s) could result in exceedance of human annoyance thresholds. The distance at which heavy-duty trucks need to travel in order to avoid exceedance of human annoyance thresholds of 72 VdB for residential uses and 75 VdB for commercial and industrial uses is 25 feet and 20 feet, respectively. Potential mitigation to address this impact includes prohibiting travel along the right lane of the roadway. Limiting the lanes of travel for construction trucks, including haul trucks, where residential, commercial, or industrial uses could be impacted would not be feasible because there would be no mechanism for enforcement. Additionally, the drivers of construction vehicles may not be under the management of the Project Proponent. Therefore, no feasible mitigation is available to mitigate on-road construction vibration impacts with regard to human annoyance and impacts would be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

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<sup>3</sup> Federal Transit Administration, 2018. *Transit Noise and Vibration Impact Assessment Manual*. September 2018. p. 113.

**4. Impact 3.11-5: Construction of the Proposed Project, in conjunction with other cumulative development, would result in cumulative temporary increases in ambient noise levels. (Refer to pages 3.11-188 through 3.11-190 of the Draft EIR.)**

**Mitigation Measure 3.11-5:** Implement Mitigation Measure 3.11-1. (Construction Noise Reduction Plan).

**Basis for Finding:** Significant on-site construction noise levels would occur during construction, and off-site construction truck traffic would result in significant increases in traffic noise in combination with cumulative construction-related noise levels if construction of the cumulative projects identified above were to overlap with construction of the Proposed Project. Implementation of the Construction Noise Reduction Plan in combination with proposed permanent and temporary noise barriers would reduce Proposed Project contribution to cumulative construction-related noise levels from on-site activities and off-site construction traffic.

Although implementation of Mitigation Measure 3.11-1 would ensure that feasible measures to minimize construction noise from the Proposed Project would be undertaken, the close proximity of affected noise sensitive receptors to potentially overlapping construction activities from the Proposed Project and nearby Cumulative Projects 67, 73 and/or 74 could result in cumulative impacts in excess of applicable thresholds at nearby noise-sensitive receptors. In addition, overlapping construction traffic, even with implementation of Mitigation Measure 3.11-1, could result in cumulative noise level increases at noise-sensitive land uses along truck routes in excess of 3 dBA.

The Proposed Project includes the installation of temporary and permanent sound walls, the most effective measure to reduce construction noise impacts, prior to commencement of heavy construction activity and reductions provided have been accounted for in the analysis. However, because the Proposed Project construction plan is not final at this point in time, and it is unknown whether construction of other projects in the area including Cumulative Projects 67, 73, and/or 73 would overlap with construction of the Proposed Project, it is not practicable to calculate a numeric reduction in mitigated noise levels attributable to the noise-reduction techniques identified in Mitigation Measure 3.11-1. Due to the uncertainty with feasibility and effectiveness of noise reduction strategies, the Proposed Project contribution to cumulative noise impacts could remain considerable, and the impacts would be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**5. Impact 3.11-6: Operation of the Proposed Project, in conjunction with other cumulative development, would result in cumulative permanent increases in ambient noise levels. (Refer to pages 3.11-190 through 3.11-228 of the Draft EIR.)**

**Mitigation Measure 3.11-6(a):** Implement Mitigation Measure 3.11-2(a). (Noise Reduction Plan).

**Mitigation Measure 3.11-6(b):** Implement Mitigation Measure 3.14 2(b) (Implementation of a comprehensive Transportation Demand Management (TDM) program).

**Basis for Finding:** Implementation of the noise reduction strategies included in Mitigation Measure 3.11-2(a) would reduce Project composite noise levels. However, effectiveness of noise reduction strategies incorporated within Mitigation Measure 3.11-2(a) are dependent on the final design of the Proposed Project and thus are uncertain at this time. Due to the uncertainty with feasibility and effectiveness of noise reduction strategies, cumulative operational noise impacts would be considered significant and unavoidable.

**Comment [U4]:** The discussion on page 60 regarding the Basis for Finding appears to be a more accurate summary of the relevant factors

Significant increases in traffic noise would be lessened by implementation of Mitigation Measure 3.14-2(b) which would require the implementation of an expanded TDM program that would reduce Project-related traffic. A reduction in Project-related traffic would result in reductions in cumulative traffic noise. The extent to which this measure would reduce trips along impacted segments is uncertain. Therefore, impacts would be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**6. Impact 3.11-7: Construction of the Proposed Project, in conjunction with other cumulative development, would generate excessive groundborne vibration. (Refer to pages 3.11-228 through 3.11-229 of the Draft EIR.)**

**Mitigation Measure 3.11-7:** Implement Mitigation Measures 3.11-3(a), 3.11-3(b), 3.11-3(c). (Minimize Construction Equipment Vibration; Vibration, Crack, and Line and Grade Monitoring Program; and Designate Community Affairs Liaison).

**Basis for Finding:** With the implementation of Mitigation Measure 3.11-7, the Proposed Project would not result in the generation of excessive groundborne vibration levels exceeding structural damage thresholds during on-site construction activity by ensuring that vibration-inducing equipment are used at distances from existing building such that the generation of significant vibration levels would be avoided, and buildings would be protected through a crack monitoring and repair program. Vibration annoyance related to onsite construction activity would be addressed through the designation of a Community Affairs Liaison. Thus, with implementation of Mitigation Measure 3.11-7, the contribution of the Proposed Project to the cumulative vibration-related structural damage impact would be less than considerable, and this cumulative impact would be considered less than significant.

As described above, heavy-duty construction truck travel along the designated haul route(s) could result in exceedance of human annoyance thresholds. The distance at which heavy-duty trucks need to travel in order to avoid exceedance of human annoyance thresholds of 72 VdB for residential uses and 75 VdB for commercial and industrial uses is 25 feet and 20 feet, respectively. Potential mitigation to address this impact includes prohibiting travel along the right lane of the roadway. Limiting the lanes of travel for construction trucks, including haul trucks, where residential, commercial, or industrial uses could be impacted would not be feasible because there would be no mechanism for enforcement. Additionally, the drivers of construction vehicles for cumulative projects would not be under the management of the project

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applicant or its construction contractors. While designation of a Community Affairs Liaison would address vibration impacts with regard to human annoyance, the impact would not be reduced to a less-than-significant level. Therefore, no feasible mitigation is available to mitigate cumulative on-road construction vibration impacts with regard to human annoyance and impacts would be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

### **C. Transportation and Circulation**

#### **1. Impact 3.14-1: Operation of the Proposed Project ancillary land uses would cause significant impacts at intersections under Adjusted Baseline conditions. (Refer to pages 3.14-190 through 3.14-192 of the Draft EIR.)**

**Mitigation Measure 3.14-1(a):** The project applicant shall implement elements of the Transportation Demand Management (TDM) Program described in Mitigation Measure 3.14 2(b) including strategies, incentives and tools to provide opportunities for daytime and non-event employees to reduce single-occupancy vehicle trips and use other modes besides automobile to travel to and from the Project Site. These elements include:

- a) TDM 1/Encourage Alternative Modes of Transportation (Rail, Public Bus, and Vanpool) – The Project shall encourage alternative modes of transportation use by providing monetary incentives and bus stop improvements near the Project Site such as:
  - Bus stop facilities improvements: The Project would provide on-site and/or off-site improvements such as lighting, new benches and overhead canopies, added bench capacity if needed, and real-time arrival information for an improved user experience for bus stops that are relocated as a result of the Project.
  - Transit and/or Multi-Modal Subsidy: The Project would provide pre-tax commuter benefits for employees.
  - Vanpool Subsidy: This would provide pre-tax commuter benefits for employees.
  - Marketing and outreach campaign for transit usage.
- b) TDM 3/Encourage Carpools and Zero-Emission Vehicles – The Project shall provide several incentives that would encourage carpooling and zero-emission vehicles as a means for sharing access to and from the Project Site including the following:
  - Provide incentives for carpools or zero-emission vehicles, including preferential parking with the number of parking spots in excess of applicable requirements, reduced parking costs, or other discounts/benefits.
- c) TDM 4/Encourage Active Transportation – The Project shall include features which enhance access for bicyclists and pedestrians including the following:
  - Bicycle parking: provide bicycle parking in excess of applicable code requirements. The Project Site would provide 60 employee bike parking spaces and 23 attendee bike parking spaces.
  - Provide showers and lockers for employees.

- Bicycle fix-it station: provide a bicycle repair station where bicycle maintenance tools and supplies are readily available on a permanent basis and offered in good condition.
  - Sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities and throughout the development.
- d) TDM 5/Employee Vanpool Program – The Project shall provide an employee vanpool program that would accommodate up to 66 employees utilizing the vanpool service. Each vanpool is assumed to have a capacity of 15 persons per vehicle. The vanpool program would be in conjunction with a vanpool subsidy providing pre-tax commuter benefits for employees as indicated in TDM 1.
- e) TDM 7/Information Services – The Project shall provide services to inform employees about transportation options including the following:
- Welcome packets for new employees and ongoing marketing.
  - Information kiosk or bulletin board providing information about public transportation options.

**Mitigation Measure 3.14-1(b):** Implement Mitigation Measure 3.14 3(f) (Northbound Exclusive Right-turn Lane and Overlap Phase on South Prairie Avenue at West Century Boulevard).

**Mitigation Measure 3.14-1(c):** Implement Mitigation Measure 3.14 3(l) (Implement protected or protected/permissive left-turn phasing on South Prairie Avenue at West 104th Street).

**Basis for Finding:** Since the majority of trips generated by the ancillary uses are generated by patrons of the commercial uses and not employees, these measures would reduce the severity of, but not eliminate, these impacts. No feasible mitigation measures are available at the Crenshaw Boulevard/West Century Boulevard intersection. These impacts are considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**2. Impact 3.14-2: Daytime events at the Proposed Project Arena would cause significant impacts at intersections under Adjusted Baseline conditions. (Refer to pages 3.14-192 through 3.14-210 of the Draft EIR.)**

**Mitigation Measure 3.14-2(a):** The project applicant shall prepare and implement an Event Transportation Management Plan (TMP). The Event TMP shall address the issues set forth below, and shall achieve the identified standards for each of these issues:

- a) Vehicle Queuing on City Streets: Through added intersection capacity and/or traffic management, traffic does not queue back to the upstream locations listed below during more than 5 percent of a pre-event peak hour (assuming no other concurrent events):
- Northbound South Prairie Avenue: vehicle queues do not spill back from the project vicinity to I-105, causing vehicle queues on the South Prairie Avenue off-ramp to exceed their available storage.
  - Southbound South Prairie Avenue: vehicle queues do not spill back from the project vicinity to beyond Manchester Boulevard.

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- Eastbound West Century Boulevard: vehicle queues do not spill back from the project vicinity to I-405, causing vehicle queues on the West Century Boulevard off-ramps to exceed their available storage.
  - Westbound West Century Boulevard: vehicle queues do not spill back from the project vicinity to beyond Crenshaw Boulevard.
- b) Pedestrian Flows: Through pedestrian flow management, pedestrians do not spill out of sidewalks onto streets with moving vehicles, particularly along portions of West Century Boulevard and South Prairie Avenue adjacent to the Project.
- c) Vehicular Parking: A comprehensive parking plan is implemented that could include strategies such as a reservation system. A comprehensive parking plan is implemented to minimize unnecessary vehicular circulation (while looking for parking) within and adjacent to the Project. The Plan could include strategies such as a reservation system, smartphone parking app, directional signage, and real-time parking garage occupancy.
- d) Bicycle Parking: Signage is clearly visible to direct bicyclists to on-site event bicycle parking. The on-site bicycle parking shall have an adequate supply to accommodate a typical major event. If monitoring shows that there is demand for on-site bicycle parking that is not being met, then additional supply (such as a bicycle valet) shall be identified.
- e) Shuttle Bus Loading: An adequate amount of curb space (accompanied by appropriate traffic management strategies) is provided along South Prairie Avenue to efficiently accommodate shuttle buses that transport attendees to/from light rail stations.
- f) Shuttle Bus Capacity and Wait Times: An adequate supply of shuttle buses is provided such that peak wait times for attendees before and after major events do not exceed 15 minutes.
- g) Paratransit: Specific suitable locations are provided to accommodate paratransit vehicle stops.
- h) Ridehailing: Traffic management strategies (including active enforcement, wayfinding, signage, etc.) are implemented to minimize pre-event passenger drop-offs in travel lanes or at curbs along the project frontage, and to provide orderly vehicle staging, passenger loading, and traffic flow of ridehailing vehicles after events. For post-event conditions, the arena is placed within a 'geofenced area' in which attendees requesting a TNC are directed to meet the TNC vehicle at the East Parking Garage. If monitoring shows that ridehailing vehicles are using travel lanes or curbs along the project frontage to drop off passengers during the pre-event period, then TCOs and/or barricades shall be stationed at locations where unauthorized drop-offs are occurring.
- i) Neighborhood Streets: Reduce traffic volumes on local and collector street segments identified in the Draft EIR as having a significant impact without causing a significant impact on other local and collector street segments. Discourage and reduce event-related cut-through traffic while maintaining access for residents and their guests.
- j) Truck Staging: Large trucks associated with concerts or other special events do not park or idle along South Prairie Avenue, West Century Boulevard, or any local/collector street in the project vicinity, with the exception of Doty Avenue between West Century Boulevard and West 102nd Street.
- 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.

**Mitigation Measure 3.14-2(b):** The project applicant shall implement a TDM Program. The TDM Program shall include strategies, incentives, and tools to provide opportunities for non-event employees and patrons as well as event attendees and employees to reduce single-occupancy vehicle trips and to use other modes of transportation besides automobile to travel to basketball games and other events hosted at the Project. The TDM Program shall include:

- a) TDM 1/Encourage Alternative Modes of Transportation (Rail, Public Bus, and Vanpool) – The Project shall encourage alternative modes of transportation use by providing monetary incentives and bus stop improvements near the Project Site such as:
- Integrated event and transit ticketing to enable seamless connections and provide event-day travel updates.
  - Discounted event tickets with the purchase of a transit pass or providing proof of a registered TAP card (the regional fare payment method).
  - Giveaways for transit users (goods for attendees, free tickets for employees, etc.).
  - Rewards/gamification opportunities for fans to compete for prizes or points based on their transportation choices.
  - Bus stop facilities improvements: The Project shall provide on-site and/or off-site improvements such as lighting, new benches and overhead canopies, added bench capacity if needed, and real-time arrival information for an improved user experience for bus stops that are relocated as a result of the Project.
  - Transit and/or Multi-Modal Subsidy: The Project would provide pre-tax commuter benefits for employees.
  - Vanpool Subsidy: This would provide pre-tax commuter benefits for employees.
  - Marketing and outreach campaign for transit usage.
- b) TDM 2/Event-day Dedicated Shuttle Services – The Project shall provide connectivity to the existing and future Metro Rail Stations and would take advantage of the transportation resources in the area. The Project shall ensure that enough shuttles would be provided for successful and convenient connectivity with short wait times. The following shall be provided:
- The Project shall provide dedicated shuttle service from the Green Line at Hawthorne Station, Crenshaw/LAX Line at AMC/96th Station, and Crenshaw/LAX Line at Downtown Inglewood station for arena events. This shuttle service shall be a dedicated event-day shuttle service from the venue for employees and attendees.
  - The Project shall provide an estimated 27 shuttles with a capacity of 45 persons per shuttle to accommodate employees and attendees traveling to and from the Project Site. Due to the arrival and departure of employees prior to the attendees, the same shuttles would be utilized for the employees. It is anticipated that the shuttle service would begin two hours before the game and extend to 30 minutes after the start. After the game, shuttle service would begin 30 minutes before the end, and continues one hour after.
  - The Project shall provide a convenient and safe location on site for shuttle pick-up and drop-off on the east side of South Prairie Avenue, approximately 250 feet south of West Century Boulevard. The drop-off location shall be adjacent to the arena so that shuttle users would not need to cross South Prairie Avenue to arrive at the arena.
  - The project applicant shall monitor the number of people using shuttles to travel between the above light rail stations and the Project. If the monitoring shows that peak wait times before or after major events exceeds 15 minutes, then the project applicant shall add sufficient additional shuttle capacity to reduce wait times to meet this target. The aim is to require increased shuttle runs as necessary to make sure that demand is accommodated within a reasonable amount of time and to encourage use of transit.

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- c) TDM 3/Encourage Carpools and Zero-Emission Vehicles – The Project shall provide several incentives that would encourage carpooling and zero-emission vehicles as a means for sharing access to and from the Project Site including the following:
- Provide incentives for carpools or zero-emission vehicles, including preferential parking with the number of parking spots in excess of applicable requirements, reduced parking costs, discounted rides (or other similar benefits) for those sharing TNC rides to or from the event, or other discounts/benefits.
  - Provide variable parking price based on car occupancy – structured to encourage carpooling.
  - The Project would provide 8 percent of parking spaces with electrical vehicle charging stations in excess of the minimum requirement of 6 percent.
- d) TDM 4/Encourage Active Transportation – The Project shall include features which enhance access for bicyclists and pedestrians including the following:
- Bicycle parking: Provide bicycle parking in excess of applicable code requirements. The Project Site would provide 60 employee bike parking spaces and 23 attendee bike parking spaces.
  - Provide showers and lockers for employees.
  - A bike valet service would be implemented if needed to accommodate bike parking space needs.
  - Bicycle fix-it station: Provide a bicycle repair station where bicycle maintenance tools and supplies are readily available on a permanent basis and offered in good condition.
  - Coordinate bike pools and walk pools.
  - Sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities and throughout the development.
- e) TDM 5/Employee Vanpool Program – The Project shall provide an employee vanpool program that would accommodate up to 66 employees utilizing the vanpool service. Each vanpool is assumed to have a capacity of 15 persons per vehicle. The vanpool program would be in conjunction with a vanpool subsidy providing pre-tax commuter benefits for employees as indicated in TDM 1.
- f) TDM 6/Park-n-Ride Program – The Project shall provide a regional park-n-ride program that would utilize charter coach buses with a capacity of up to 45 persons per bus to accommodate up to 1,980 attendees. Parking lot locations would correspond to zip code ticket purchase data, and the site circulation would be designed to account for the charter coaches. The operation of this park-n-ride would be similar to the currently operating park-n-ride program from the Hollywood Bowl venue located in the Hollywood Hills within the County of Los Angeles.
- g) TDM 7/Information – The Project shall provide information services to inform the public about activities at the Project including the following:
- Strategic multi-modal signage/wayfinding.
  - Real-time travel information; changeable message sign (CMS) and social media.
  - Welcome packets for new employees and ongoing marketing.
  - Commercials/advertisement – television, website, social media, radio, etc.
  - Information kiosk or bulletin board providing information about public transportation options.
- h) TDM 8/Reduce On-Site Parking Demand – The Project shall include features that reduce on-site parking demand such as:
- Provide coach bus/minibus/microtransit staging and parking areas: The Project is designed to accommodate 20 minibus/microtransit/paratransit parking spaces and 23 charter coach bus spaces. The capacity for minibus/microtransit/paratransit is 10 persons per vehicle and 45 persons per bus for the charter coach bus.
  - Allocated sufficient TNC staging spaces: The Project is designed to accommodate approximately 160 spaces for TNC staging.

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- i) TDM 9/Event-Day Local Microtransit Service – The Project shall provide a local minibus/microtransit service for all event days with a service range of approximately 6 miles surrounding the Project Site. Each minibus is assumed to have a capacity of 10 persons per vehicle, and the service would accommodate up to 66 employees and up to 180 attendees on all event days.
- j) Monitoring – The TDM Program shall include an ongoing program to monitor each of the TDM Program elements listed above. The monitoring program shall collect data on the implementation of each specific TDM strategy, and shall assess the extent to which the TDM Program is meeting demand for alternative forms of transportation, and reducing vehicle trips and reliance on private automobiles. The information obtained through this monitoring program shall be provided to the City Traffic Engineer on an annual basis.

A monitoring report shall be prepared not less than once each year. The report shall evaluate whether the TDM Program is achieving the reductions in vehicle trips set forth above. 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.

The TDM Program 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.

**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.

**Mitigation Measure 3.14-2(d):** The project applicant shall construct (via restriping and conversion of median) second left-turn lanes on the northbound and southbound approaches to the West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard intersection and operate the northbound right-turn with an overlap phase.

**Mitigation Measure 3.14-2(e):** Implement Mitigation Measure 3.14-3(f) (Implement northbound exclusive right-turn lane and overlap phase on South Prairie Avenue at West Century Boulevard).

**Mitigation Measure 3.14-2(f):** The project applicant shall restripe the westbound West 104th Street approach to Yukon Avenue from consisting of a shared left/through/right lane to consist of a left/through lane and a dedicated right-turn lane.

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**Mitigation Measure 3.14-2(g):** The project applicant shall work with the City of Inglewood and Caltrans to widen the I-105 off-ramp approach to South Prairie Avenue to consist of two lefts, a shared left/through/right, and a dedicated right-turn lane. This would require complying with the Caltrans project development process as a local agency-sponsored project. Depending on the complexity and cost of the improvement, this could include (but is not limited to) a cooperative agreement, permit engineering evaluation report, project study report, project report, environmental and engineering studies, project design, construction, etc.

**Mitigation Measure 3.14-2(h):** The project applicant shall restripe the eastbound approach of Manchester Boulevard at La Brea Avenue to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes and one right-turn lane.

**Mitigation Measure 3.14-2(i):** The project applicant shall restripe the westbound approach of Manchester Boulevard at Crenshaw Boulevard to provide a second left-turn lane, resulting in two left-turn lanes, one through lane and one shared through/right-turn lane.

**Mitigation Measure 3.14-2(j):** The project applicant shall work with the City of Inglewood, the City of Hawthorne, and Caltrans to widen the I-105 westbound off-ramp at Crenshaw Boulevard to consist of one left, one left/through, and two right-turn lanes. This would require complying with the Caltrans project development process as a local agency-sponsored project. Depending on the complexity and cost of the improvement, this could include (but is not limited to) a cooperative agreement, permit engineering evaluation report, project study report, project report, environmental and engineering studies, project design, construction, etc.

**Mitigation Measure 3.14-2(k):** The project applicant shall work with the City of Hawthorne to remove the median island and restripe the southbound approach of South Prairie Avenue at 120th Street to provide a second left-turn lane, resulting in two left-turn lanes, two through lanes and one shared through/right-turn lane.

**Mitigation Measure 3.14-2(l):** The project applicant shall work with the City of Hawthorne to implement a southbound right-turn overlap signal phase at the intersection of Crenshaw Boulevard and 120th Street.

**Mitigation Measure 3.14-2(m):** Provide TCOs on Crenshaw Boulevard at 120<sup>th</sup> Street during post-event period as part of Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Mitigation Measure 3.14-2(n):** The project applicant shall construct a second left-turn lane on southbound La Brea Avenue at Centinela Avenue and implement protected left turns for the northbound and southbound approaches.

**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.

**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

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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.

**Basis for Finding:** A draft of the Event TMP described under Mitigation Measure 3.14-2(a) is included as Appendix K.4 of the EIR. The measures described in Mitigation Measure 3.14-2(b) are included in the TDM Program, which was peer reviewed by Fehr & Peers and the City during preparation of the EIR and are considered objective and appropriate for inclusion in the Draft EIR.

Mitigation Measures 3.14-2(c) through 3.14-2(n) on the previous two pages identify physical mitigation measures that could reduce the impacts at the specific impacted intersections listed in these mitigation measures. No feasible physical mitigation was identified that would reduce impacts at the remaining impacted intersections. However, the combined effects of the Event TMP, coordinated/special event signal timings, and the physical mitigations below, would have synergistic effects to improve operations at other intersections without requiring physical improvements at them.

Mitigation Measure 3.14-2(c), if implemented, would improve operations at the West Century Boulevard/La Cienega Boulevard intersection from LOS F (with project) to E (with project and mitigation) during the weekday AM peak hour and from LOS D (with project) to C (with project and mitigation) during the weekday PM peak hour, thereby resulting in a less-than-significant impact. The City finds that LADOT, which has jurisdiction over a portion of this intersection, can and should allow this improvement to occur. (CEQA Guidelines, § 15091(a)(2).) Since the improvement involves another jurisdiction in addition to the City of Inglewood, however, its implementation cannot be guaranteed and the impact is considered to be significant and unavoidable.

Mitigation Measure 3.14-2(d) would improve operations at the West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard intersection from LOS D (with project) to C (with project and mitigation) during the weekday AM peak hour and from LOS F (with project) to E (with project and mitigation) during the weekday PM peak hour. The impact would be significant and unavoidable during the PM peak hour because operations would not be restored to ‘no project’ conditions.

The impact at the South Prairie Avenue/West Century Boulevard intersection would be significant and unavoidable because the improvement under Mitigation Measure 3.14-2(e) does not mitigate the Daytime Event impact during the PM peak hour.

Mitigation Measure 3.14-2(f) would improve operations at the West 104th Street/Yukon Avenue intersection from LOS C (with project) to A (with project and mitigation) during the weekday AM peak hour and maintain LOS D conditions during the weekday PM peak hour. The impact would be significant and unavoidable during the PM peak hour because operations would not be restored to ‘no project’ conditions.

Although it is not yet designed, it is possible that implementation of Mitigation Measure 3.14-2(g) would result in the creation of a new off-ramp lane to the south of the existing southernmost off-ramp lane at Prairie Avenue. The construction of this new off-ramp lane would move noise-generating traffic approximately 10-12 feet closer to residences at 11207 South Prairie Avenue (on the west side, between West 112th and West 113th Streets). These residences are currently approximately 60 feet from the closest travel lane; with implementation of Mitigation Measure 3.14-2(g), the distance would be reduced to approximately 48 feet. The reduction of the distance could increase noise levels at these residences. Because the homes are not protected by a soundwall, it is possible that the incremental increase in noise could be significant.



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The addition of a new off-ramp lane would move vehicles that are the source of criteria pollutant and toxic air contaminant emissions approximately 12 feet closer to the residences than under existing conditions. It is unlikely that the addition of the new off-ramp lane would result in significant concentrations of these air pollutants.

In addition, construction of Mitigation Measure 3.14-2(g) would remove an indeterminate amount of roadway shoulder landscaping, including potentially some landscape trees that are planted on the south side of current off-ramp lanes. Further, as described for the Proposed Project, although the site of this mitigation measure is highly disturbed by past road construction, it remains possible that unknown archaeological resources could be discovered, or that previously unknown contaminants from roadway runoff could be encountered.

Mitigation Measure 3.14-2(g) would occur within right-of-way that is under the jurisdiction of Caltrans, and prior to implementation Caltrans would undertake environmental review pursuant to CEQA that would identify and mitigate to the extent feasible any reasonably anticipated environmental impacts of this measure.

Mitigation Measure 3.14-2(g), if implemented, would improve operations at the I-105 off-ramp/South Prairie Avenue intersection from LOS C (with project) to B (with project and mitigation) during the weekday AM peak hour and from LOS F (with project) to E (with project and mitigation) during the weekday PM peak hour, although the impact would be significant during the PM peak hour since the Adjusted Baseline No Project LOS is D during this period. Since the improvement involves another jurisdiction in addition to the City of Inglewood, its impacts are too speculative for analysis before the improvement is designed, it would require independent CEQA review by Caltrans prior to implementation, and its implementation cannot be guaranteed. The City also finds that, subject to further CEQA review, Caltrans can and should authorize this improvement. (CEQA Guidelines, § 15091(a)(2).) In light of these uncertainties, however, the impact is considered to be significant and unavoidable.

Mitigation Measure 3.14-2(h) would mitigate the Daytime Event impact at the Manchester Boulevard/La Brea Avenue intersection during the PM peak hour to a less-than-significant level.

Mitigation Measure 3.14-2(i) would mitigate the Daytime Event impact at the Manchester Boulevard/Crenshaw Boulevard intersection during the PM peak hour to a less-than-significant level.

Although it is not yet designed, it is possible that implementation of Mitigation Measure 3.14-2(j) would result in the creation of a new off-ramp lane to the north of the existing northernmost westbound off-ramp lane at Crenshaw Boulevard. The construction of this new off-ramp lane would move noise-generating traffic approximately 10-12 feet closer to residences at the corner of 119th Street and Crenshaw Boulevard, and at 119th Street and Atkinson Avenue. These residences are currently approximately 100-110 feet from the closest off-ramp lane; with implementation of Mitigation Measure 3.14-3(j), the distance would be reduced to 90-100 feet. The reduction of the distance could increase noise levels at these residences. However, because the homes are already protected by a soundwall that runs on the south side of 119th Street, it is unlikely that the incremental increase in noise would be significant.

The addition of a new off-ramp lane would move vehicles that are the source of criteria pollutant and toxic air contaminant emissions approximately 12 feet closer to the residences than under existing conditions. It is unlikely that the addition of the new off-ramp lane would result in significant concentrations of these air pollutants.

In addition, construction of Mitigation Measure 3.14-2(j) would remove an indeterminate amount of ruderal grassland and potentially some landscape trees that are planted on the south side of the soundwall.

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Further, as described for the Proposed Project, although the site of this mitigation measure is highly disturbed by past road construction, it remains possible that unknown archaeological resources could be discovered, or that previously unknown contaminants from roadway runoff could be encountered.

Mitigation Measure 3.14-2(j) would occur within right-of-way that is under the jurisdiction of Caltrans, and prior to implementation Caltrans would undertake environmental review pursuant to CEQA that would identify and mitigate any reasonably anticipated environmental impacts of this measure.

Mitigation Measure 3.14-2(j) reduces the Daytime Event impact at the I-105 westbound off-ramp/Crenshaw Boulevard intersection during the PM peak hour but not to less than significant. Since the improvement involves other jurisdictions beyond the City of Inglewood, its impacts are too speculative for analysis before the improvement is designed and would require independent CEQA review by Caltrans prior to implementation, and its implementation cannot be guaranteed. The City also finds that, subject to further CEQA review, Caltrans can and should authorize this improvement. (CEQA Guidelines, § 15091(a)(2).) In light of these uncertainties, the impact is considered to be significant and unavoidable.

Mitigation Measure 3.14-2(k) would mitigate the Daytime Event impact at the South Prairie Avenue/120th Street intersection during the PM peak hour to a level of less than significant. The improvement involves another jurisdiction in addition to the City of Inglewood. The City finds that the City of Hawthorne can and should authorize the improvement. (CEQA Guidelines, § 15091(a)(2).) Because its implementation cannot be guaranteed, however, the impact is considered to be significant and unavoidable.

If implemented and in conjunction with Mitigation Measure 3.14-2(m), the modifications under Mitigation Measure 3.14-2(l) would improve operations at the Crenshaw Boulevard/120th Street intersection from LOS F (with project) to C (with project and mitigation) during the weekday post-event peak hour. Although the impact would still be significant per the impact criteria, this would be a substantial improvement in operations. The improvement involves another jurisdiction beyond the City of Inglewood. The City finds that the City of Hawthorne can and should authorize the improvement. (CEQA Guidelines, § 15091(a)(2).) Because its implementation cannot be guaranteed, however, the impact is considered to be significant and unavoidable.

The Event TMP could benefit operations at the Crenshaw Boulevard/120th Street intersection under Mitigation Measure 3.14-2(m). The TMP includes placement of a TCO and traffic cones to permit the southbound approach to function with two right-turn lanes at this intersection during the post-event period to better facilitate traffic flow. If implemented, the modifications would improve operations from LOS F (with project) to C (with project and mitigation) during the weekday post-event peak hour. Although the impact would still be significant per the impact criteria, this would be a substantial improvement in operations.

Deployment of electronic changeable message signs (CMS) and/or blank-out signs (depending on location and the nature of the message) could be considered at the 120th Street/Crenshaw Boulevard intersection in lieu of TCOs. Experience from other venues has determined that it is preferable to evaluate the effectiveness of TCOs and special event staff deployment before deciding whether permanent electronic signs would be effective and economical.

Mitigation Measure 3.14-2(n), which would consist primarily of restriping and not require right-of-way acquisition, would mitigate and restore operations at the La Brea Avenue/Centinel Avenue intersection to better than the “no project” condition, thereby mitigating this impact to less than significant.

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The City of Inglewood is implementing a city-wide ITS program on key corridors including but not limited to West Century Boulevard, South Prairie Avenue, Manchester Boulevard, Florence Avenue, Centinela Avenue, Crenshaw Boulevard, Imperial Highway, La Brea Avenue, La Cienega Boulevard, Arbor Vitae Street, and Pincay Drive. The program is to enable intersections to operate as part of a coordinated system, to allow for remote intersection monitoring from the City's Traffic Management Center, and to provide flexibility to remotely change signal timings from the Traffic Management Center in response to changes in traffic flows or incidents. ITS will provide a fully responsive traffic signal system based on real time traffic conditions that can provide instantaneous traffic information and predictive time information to users along access corridors. Additionally, this would enable the City to better accommodate event-related traffic. Intersection improvements designed to address the significant impacts of the Project consist of financial contribution toward the design, construction, and integration of ITS improvements, which include but are not limited to: vehicles detection, computer hardware and networking, fiber-optic communication system upgrades, closed circuit TV cameras, changeable message signs, blank-out signs, equipment and networking management, traffic signal modifications, Traffic Management Center and Decision Support System integration, software licensing, high resolution data, connected vehicle technology, upgrading outdated software and equipment, ATC controllers and cabinets, lane control management, and other improvements to the ITS network. The ITS improvements focus on intersections on certain key corridors potentially affected by the Proposed Project. Under Mitigation Measure 3.14-2(o), funding contributions may focus on ITS improvements along these corridors, in addition to at identified intersections. The financial contribution shall be available for ITS improvements at the following intersections and to the corridors where these intersections are located. The list below comprises intersections impacted under either Adjusted Baseline and/or cumulative conditions). Impact 3.14-28 in Section 3.14.5 lists five additional intersections that are significantly impacted by the Proposed Project under a concurrent event at The Forum.

- La Cienega Boulevard / Florence Avenue
- Centinela Avenue / Florence Avenue
- South Prairie Avenue / Florence Avenue
- West Boulevard / Florence Avenue
- South Prairie Avenue / Grace Avenue
- South Prairie Avenue / East Carondelet Way
- South Prairie Avenue / East Regent Street
- La Cienega Boulevard / Manchester Boulevard
- La Brea Avenue / Manchester Boulevard
- Hillcrest Boulevard / Manchester Boulevard
- Spruce Avenue / Manchester Boulevard
- South Prairie Avenue / Manchester Boulevard
- Kareem Court / Manchester Boulevard
- Crenshaw Boulevard / Manchester Boulevard
- South Prairie Avenue / Kelso Street / Pincay Drive
- La Cienega Boulevard / Arbor Vitae Street
- Inglewood Avenue / Arbor Vitae Street
- Myrtle Avenue / Arbor Vitae Street
- South Prairie Avenue / Arbor Vitae Street
- La Brea Avenue / Hardy Street
- South Prairie Avenue / Hardy Street
- Crenshaw Boulevard / Hardy Street
- Felton Avenue / West Century Boulevard
- Inglewood Avenue / West Century Boulevard
- Fir Avenue / Firmona Avenue / West Century Boulevard
- Grevillia Avenue / West Century Boulevard

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- Hawthorne Boulevard / La Brea Boulevard / West Century Boulevard
- Myrtle Avenue / West Century Boulevard
- Freeman Avenue / West Century Boulevard
- South Prairie Avenue / West Century Boulevard
- Doty Avenue / West Century Boulevard
- Yukon Avenue / West Century Boulevard
- Club Drive / West Century Boulevard
- 11th Avenue / Village Avenue / West Century Boulevard
- Crenshaw Boulevard / West Century Boulevard
- 5th Avenue / West Century Boulevard
- Yukon Avenue / West 102nd Street
- Hawthorne Boulevard / West 104th Street
- South Prairie Avenue / West 104th Street
- Yukon Avenue / West 104th Street
- Crenshaw Boulevard / West 104th Street
- South Prairie Avenue / Lennox Boulevard
- South Prairie Avenue / 108th Street
- South Prairie Avenue / 111th Street
- South Prairie Avenue / Imperial Highway
- Doty Avenue / Imperial Highway
- Crenshaw Boulevard / Imperial Highway
- Crenshaw Boulevard / 120th Street
- Hollywood Park Casino Driveway / West Century Boulevard
- South Prairie Avenue / Buckthorn Street
- Van Ness Avenue / Manchester Boulevard
- Crenshaw Boulevard / Pincay Drive

The Adjusted Baseline Plus Project (Daytime Event) scenario included a number of intersections that were also significantly impacted with a major event (see Impact 3.14.3). However, some of the mitigation measures for impacts during a major event were not considered for a Daytime Event because they would not be effective from the perspective of showing improved operations. This stems from the use of different intersection analysis methods between the two scenarios. An example of this is the Prairie Avenue/Pincay Street intersection.

The combined effectiveness of the above mitigation measures is displayed on Table 3.14-59, on pages 3.14-207 through 3.14-210, of the EIR. Of the nine significant intersection impacts identified during the weekday AM peak hour, the above mitigation measures would cause two to become less than significant. Of the 46 significant intersection impacts identified during the weekday PM peak hour, the above mitigation measures would cause five to become less than significant. The precise degree of effectiveness of proposed TDM strategies to shift the mode split away from driving and reduce the project's vehicular trip generation is not known. Therefore, mitigation measure testing did not explicitly account for a certain amount of reduced vehicle travel due to TDM strategies. However, the above list of mitigation measures would reduce vehicle travel demand, accommodate the remaining travel demand in a more efficient manner, and provide physical improvements, where feasible, to add capacity to the roadway system. None of the physical improvements described above would require additional right-of-way; however, some would require coordination with other responsible agencies. The City finds that, to the extent the improvements fall within the jurisdiction of another agency (LADOT, Caltrans, City of Hawthorne), the other agency can and should authorize them to occur. (CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that these agencies would permit these improvements to be constructed. Thus, for the various reasons described here, these impacts are considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**3. Impact 3.14-3: Major events at the Proposed Project Arena would cause significant impacts at intersections under Adjusted Baseline conditions. (Refer to pages 3.14-211 through 3.14-237 of the Draft EIR.)**

**Mitigation Measure 3.14-3(a):** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Mitigation Measure 3.14-3(b):** Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).

**Mitigation Measure 3.14-3(c):** The project applicant shall work with the City of Inglewood and Caltrans to restripe the center lane on the I-405 NB Off-Ramp at West Century Boulevard to permit both left and right-turn movements. This would require complying with the Caltrans project development process as a local agency-sponsored project. This could include (but is not limited to) a cooperative agreement, permit engineering evaluation report, encroachment permit, project design, construction, etc.

**Mitigation Measure 3.14-3(d):** Implement Mitigation Measure 3.14-2(d) (West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard Improvements).

**Mitigation Measure 3.14-3(e):** The project applicant shall convert the signal control system at the intersection of South Prairie Avenue and Pincay Drive to provide protected or protected-permissive westbound and eastbound left-turn phasing.

**Mitigation Measure 3.14-3(f):** The project applicant shall widen the east side of South Prairie Avenue to extend the proposed shuttle bus pull-out on the east side of South Prairie Avenue to the intersection to serve as an exclusive right-turn lane. Additionally, implement a northbound right-turn signal overlap phase. During pre-event and post-event periods, TCOs shall be positioned at this location as part of the Event TMP to manage the interaction of northbound right-turning traffic and pedestrians in the east leg crosswalk and to permit the lane to also operate as a bus queue jumper for shuttle buses departing the shuttle bus pull-out and traveling north through the intersection.

**Mitigation Measure 3.14-3(g):** Implement Mitigation Measure 3.14-2(g) (I-105 Off-Ramp Widening at South Prairie Avenue).

**Mitigation Measure 3.14-3(h):** Implement Mitigation Measure 3.14-2(j) (I-105 Westbound Off-Ramp Widening at Crenshaw Boulevard).

**Mitigation Measure 3.14-3(i):** Implement Mitigation Measure 3.14-2(l) (Crenshaw Boulevard/120th Street Improvements).

**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

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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.

**Mitigation Measure 3.14-3(k):** Implement Mitigation Measure 3.14-2(n) (La Brea Avenue/Centinel Avenue Improvements).

**Mitigation Measure 3.14-3(l):** The project applicant shall implement protected or protected/permissive left-turn phasing on northbound and southbound South Prairie Avenue at West 104th Street.

**Mitigation Measure 3.14-3(m):** Implement Mitigation Measure 3.14-2(e) (Restripe the westbound West 104th Street approach to Yukon Avenue to consist of a left/through lane and a dedicated right-turn lane).

**Mitigation Measure 3.14-3(n):** Implement Mitigation Measure 3.14-2(i) (Manchester Boulevard/Crenshaw Boulevard Improvements).

**Mitigation Measure 3.14-3(o):** The project applicant shall work with the City of Inglewood to coordinate traffic signals and optimize traffic signal timings to accommodate major event traffic flows (see Figure 3.14-17 for locations).

**Mitigation Measure 3.14-3(p):** Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS program).

**Basis for Finding:** Mitigation Measures 3.14-3(c) through 3.14-3(n) above identify physical mitigation measures that could reduce the impacts at the specific impacted intersections listed in these mitigation measures. No feasible physical mitigation was identified that would reduce impacts at the remaining impacted intersections. However, the combined effects of the Event TMP, coordinated/special event signal timings, and the physical mitigations below, would have synergistic effects to improve operations at other intersections without requiring physical improvements to them.

If Mitigation Measure 3.14-3(c) is implemented, the modification to the center lane on the I-405 NB Off-Ramp at West Century Boulevard would improve operations from LOS F (with project) to C (with project and mitigation) during the weekend pre-event peak hour but would not improve upon the 'no project' LOS F condition during the weekday pre-event peak hour. The City finds that Caltrans can and should authorize this improvement. (CEQA Guidelines, § 15091(a)(2).) Since the improvement involves another jurisdiction in addition to the City of Inglewood, however, its implementation cannot be guaranteed and the impact is considered to be significant and unavoidable.

The modifications under Mitigation Measure 3.14-2(d) would maintain LOS F conditions at the West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard intersection during the weekday and weekend pre-event peak hour conditions and improve weekday post-event peak hour conditions from LOS F to E. The impact would be significant and unavoidable because an acceptable LOS D would not be achieved.

The modification under Mitigation Measure 3.14-3(e) would improve operations at the South Prairie Avenue/Pincay Drive intersection from LOS E (with project) to C (with project and mitigation) during the weekday pre-event peak hour, thereby mitigating this impact to less than significant.

The Proposed Project site plan would provide sufficient area to allow for widening Prairie Avenue to provide a northbound right-turn lane. However, it would cause the sidewalk along the east side of Prairie

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Avenue between the plaza entry/exit and Century Boulevard to be reduced from 20 to 8 feet in width. This is considered a potentially significant secondary impact because it could cause post-event pedestrian flows to exceed the sidewalk capacity (thereby resulting in walking in the street). In response to this potential condition, the Event TMP (Mitigation Measure 3.14-2(a)) includes post-event pedestrian wayfinding guidance, which if followed, would result in the majority of post-event attendees using the primary plaza exit to access the east leg crosswalk at the Prairie Avenue/Century Boulevard intersection, thereby limiting flows on this sidewalk to match its available width. With Mitigation Measure 3.14-3(f) in place, operations at the Prairie Avenue/Century Boulevard intersection would remain at LOS F (with similar delay levels to ‘without mitigation’) conditions. The impact would be significant and unavoidable because an acceptable LOS D would not be achieved. Other mitigation measures, such as adding a second northbound and southbound left-turn lane were also considered, but found not to be feasible due to lack of roadway width and developed or developing properties on all quadrants of the intersection.

Mitigation Measure 3.14-3(g), if implemented, would improve operations at the I-105 Off-Ramp/South Prairie Avenue intersection from LOS F (with project) to D (with project and mitigation) during the weekday post-event peak hour, thereby mitigating this portion of the impact to less than significant. However, operations would not be restored to an acceptable LOS during the weekday pre-event peak hour. The City finds that Caltrans can and should authorize this improvement. (CEQA Guidelines, § 15091(a)(2).) Since the improvement involves another jurisdiction in addition to the City of Inglewood, however, its implementation cannot be guaranteed and the impact is considered to be significant and unavoidable.

Mitigation Measure 3.14-3(h), if implemented, would improve operations at the I-105 Westbound Off-Ramp/Crenshaw Boulevard intersection from LOS E (with project) to D (with project and mitigation) during the weekday and weekend pre-event peak hours, thereby mitigating this impact to less than significant. The City finds that Caltrans and the City of Hawthorne can and should authorize this improvement. (CEQA Guidelines, § 15091(a)(2).) Since the improvement involves other jurisdictions beyond the City of Inglewood, however, its implementation cannot be guaranteed and the impact is considered to be significant and unavoidable.

Mitigation Measure 3.14-3(i), if implemented and in conjunction with Mitigation Measure 3.14-3(a), would improve operations at the Crenshaw Boulevard/120th Street intersection from LOS F (with project) to B (with project and mitigation) during the weekday post-event peak hour, thereby mitigating this impact to less than significant. The City finds that the City of Hawthorne can and should authorize this improvement. (CEQA Guidelines, § 15091(a)(2).) Since the improvement involves another jurisdiction beyond the City of Inglewood, however, its implementation cannot be guaranteed and the impact is considered to be significant and unavoidable.

Mitigation Measure 3.14-3(j), if implemented, would improve operations at the La Cienega Boulevard/Centinela Avenue intersection under with project conditions to a V/C ratio the same as or better than the no project condition under during all three analysis periods, thereby mitigating the impact to less than significant. The City finds that LADOT can and should authorize this improvement. (CEQA Guidelines, § 15091(a)(2).) Since the improvement involves another jurisdiction in addition to the City of Inglewood, however, its implementation cannot be guaranteed and the impact is considered to be significant and unavoidable.

Mitigation Measure 3.14-3(k), which would consist primarily of restriping and not require right-of-way acquisition, would improve operations at the La Brea Avenue/Centinela Avenue intersection from LOS E (with project) to D (with project and mitigation) during the weekday pre-event peak hour, thereby mitigating this impact to less than significant.

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Mitigation Measure 3.14-3(l) would reduce the severity of LOS F operations at South Prairie Avenue at West 104th Street compared to with project conditions for weekday and weekend pre-event conditions, but maintain LOS F during both periods. Operations would remain at LOS E during the weekday post-event peak hour. The impact would be significant and unavoidable during the weekday pre-event, weekday post-event, and weekend pre-event peak hours because operations would not improve to an acceptable LOS D or better.

Mitigation Measure 3.14-3(m) would reduce the severity of LOS F operations at the West 104th Street/ Yukon Avenue intersection compared to with project conditions during the weekday pre-event peak hour, though operations would remain at LOS F. The impact would be significant and unavoidable during the weekday pre-event peak hour.

Mitigation Measure 3.14-3(n) would improve operations at Manchester Boulevard/Crenshaw Boulevard from LOS F (with project) to E (with project and mitigation) during the weekday pre-event peak hour, thereby mitigating this impact to less than significant (because operations would be at LOS F under no project conditions). This modification improves operations from LOS E (with project) to C (with project and mitigation) during the weekend pre-event peak hour, thereby mitigating this impact to less than significant. The City finds that Caltrans and the City of Hawthorne can and should authorize this improvement. (CEQA Guidelines, § 15091(a)(2).)

Mitigation Measure 3.14-3(o) would reduce impacts or the severity of impacts at intersections along key corridors throughout the study area, including in some cases intersections near the Proposed Project. However, in some cases improving traffic flow at one or more intersections may degrade operations at others by relieving an upstream bottleneck, thus permitting more traffic to flow through downstream intersections. This, in turn, would contribute to secondary significant impacts described below.

Under Mitigation Measure 3.14-3(p), the ITS improvements focus on intersections on certain key corridors potentially affected by the Proposed Project. Figure 3.14-17 and the Event TMP (see Appendix K.4) indicate that there are several "arterial-to-arterial" impacted intersections that do not have a recommended physical improvement nor an active traffic management component. Two examples are the Manchester Boulevard/South Prairie Avenue and Crenshaw Boulevard/West Century Boulevard intersections. At the Manchester Boulevard/South Prairie Avenue intersection, operation of the intersection with officers along with a modified set of lane assignments (to facilitate travel toward the Proposed Project) was tested using microsimulation, but found not to be effective. Hence, it is not included as part of the coordinated/optimized South Prairie Avenue corridor signal timing plan. At the Crenshaw Boulevard/West Century Boulevard intersection, the recently constructed improvements were reviewed and no further capacity increases were deemed feasible. Similar reviews were conducted of other intersections featuring significant impacts.

The combined effectiveness of the above mitigation measures is displayed on Table 3.14-60, on pages 3.14-220 through 3.14-236 of the EIR. Based on network-level microsimulation analysis, under major event conditions, the mitigations at major bottlenecks often result in increased traffic flow at adjacent and/or downstream intersections. Improving the flow at major bottleneck locations, although desirable, can cause secondary, significant impacts. The following describes their effectiveness during each peak hour.

#### Weekday Pre-Event Peak Hour

Of the 42 significant intersection impacts, the above mitigation measures would cause 15 to become less than significant. In some cases, these mitigation measures improved traffic flow at one or more intersections, which resulted in degraded operations at others by relieving an upstream bottleneck or causing queues to spillback to a nearby intersection, worsening its operations. This occurred at six such

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intersections. Those locations are identified in Table 3.14-60 showing their results being shaded for the ‘with mitigation’ scenario, but not shaded for the ‘plus project’ scenario. Opportunities for physical or further operational/signal timing improvements at these locations were investigated, but no feasible mitigations were identified. The average percent demand served at the 68 intersections analyzed using microsimulation increased from 85 percent (without mitigation) to 90 percent with the recommended mitigation measures in place.<sup>4</sup>

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**4. Impact 3.14-4: Operation of the Proposed Project ancillary land uses would cause significant impacts on neighborhood streets under Adjusted Baseline conditions. (Refer to pages 3.14-237 through 3.14-238 of the Draft EIR.)**

**Mitigation Measure 3.14-4(a):** Implement Neighborhood Traffic Management Plan component of Event TMP, which is contained in Mitigation Measure 3.14-2(a).

**Mitigation Measure 3.14-4(b):** Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).

**Basis for Finding:** The Event TMP, which can be found in Appendix K.4 of this EIR, includes a chapter on neighborhood traffic protection including the need for the project applicant to develop and implement a Neighborhood Traffic Management Plan (NTMP). The NTMP would cover the area bounded by Hawthorne Boulevard, Hardy Boulevard, Crenshaw Boulevard, and Imperial Highway (excluding the Hollywood Park Specific Plan area). It outlines the process by which the applicant and City would engage neighborhood groups, businesses, and stakeholders to develop a plan that has broad consensus and protects the neighborhood from unwanted traffic intrusion during events at the Proposed Project. It was not possible for the Draft EIR to identify a solution with broad consensus among stakeholders that would fully address and mitigate the traffic levels expected on the impacted streets. Such an effort would require extensive public outreach, as well as detailed study of how various measures could be implemented to reduce volumes on street segments identified as having significant street impacts without causing additional impacts on nearby streets. The NTMP lays out the process to be undertaken to complete this assessment.

At this time, the effectiveness of the NTMP toward reducing traffic levels on impacted neighborhood streets to acceptable thresholds cannot be guaranteed. Although implementation of the TDM Program may reduce vehicle trips, the precise degree of trip reduction cannot be precisely quantified to determine whether an impact could be avoided at any potentially impacted neighborhood street. Therefore, this

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<sup>4</sup> “Average percent demand served” by the entire simulation network is a metric which quantifies the extent to which the entire hourly travel demand for a given intersection is able to be served within that hour. Under congested conditions, bottlenecks form in the system which can cause traffic not to be able to reach downstream intersections, or can cause blockages of upstream intersections by queued vehicles at the bottleneck. When the percent demand served falls well below 100 percent (e.g., to 75 to 85 percent for a large network such as this), the likelihood of ‘peak hour spreading’ (i.e., multiple hours of congestion) increases.

impact is considered significant and unavoidable. However, the Event TMP includes a performance standard that requires reducing traffic volumes on local and collector street segments identified in the Draft EIR as having a significant impact without causing a significant impact on other local and collector street segments and discouraging and reducing event-related cut-through traffic while maintaining access for residents and their guests.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**5. Impact 3.14-5: Daytime events at the Proposed Project Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions. (Refer to pages 3.14-238 through 3.14-239 of the Draft EIR.)**

**Mitigation Measure 3.14-5:** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Basis for Finding:** The Event TMP, which can be found in Appendix K.4 of the EIR, includes a chapter on neighborhood traffic protection including the need for the project applicant to develop and implement a NTMP. At this time, the effectiveness of the NTMP element of the TMP toward reducing traffic levels on impacted neighborhood streets to acceptable thresholds cannot be guaranteed. However, the Event TMP includes a performance standard that requires reducing traffic volumes on local and collector street segments identified in the EIR as having a significant impact without causing a significant impact on other local and collector street segments and discouraging and reducing event-related cut-through traffic while maintaining access for residents and their guests.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**6. Impact 3.14-6: Major events at the Proposed Project Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions. (Refer to pages 3.14-239 through 3.14-240 of the Draft EIR.)**

**Mitigation Measure 3.14-6:** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Basis for Finding:** The Event TMP, which can be found in Appendix K.4 of the EIR, includes a chapter on neighborhood traffic protection including the need for the project applicant to develop and implement a NTMP. At this time, the effectiveness of the NTMP element of the TMP toward reducing traffic levels on impacted neighborhood streets to acceptable thresholds cannot be guaranteed. Therefore, this impact is considered significant and unavoidable. However, the Event TMP includes a performance standard that requires reducing traffic volumes on local and collector street segments identified in the EIR as having a

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significant impact without causing a significant impact on other local and collector street segments and discouraging and reducing event-related cut-through traffic while maintaining access for residents and their guests.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**7. Impact 3.14-8: Daytime events at the Proposed Project Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions. (Refer to pages 3.14-241 through 3.14-242 of the Draft EIR.)**

**Mitigation Measure 3.14-8 (a):** Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b).

**Mitigation Measure 3.14-8 (b):** The project applicant shall 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.

**Basis for Finding:** The freeway component impacts are considered to be significant and unavoidable despite the presence of the above mitigation measures. Implementation of these measures would not guarantee that operations at each impacted component would be restored to ‘no project’ levels. Freeway off-ramp queuing under this scenario would be less than significant and require no mitigation.

**Finding:** The City finds that Caltrans can and should accept this contribution towards the implementation of Caltrans’ TMS improvements along the I-105 corridor. (CEQA Guidelines, § 15091(a)(2).) The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**8. Impact 3.14-9: Major events at the Proposed Project Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions. (Refer to pages 3.14-242 through 3.14-244 of the Draft EIR.)**

**Mitigation Measure 3.14-9(a):** Implement mitigation measure 3.14-3(h) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).

**Mitigation Measure 3.14-9(b):** Implement Mitigation Measure 3.14-3(c) (Restripe I-405 NB Off-Ramp at West Century Boulevard).

**Mitigation Measure 3.14-9(c):** Implement Mitigation Measure 3.14-3(o) (Retime and optimize traffic signals on Inglewood streets).

**Mitigation Measure 3.14-9(d):** Implement Mitigation Measure 3.14-3(g) (I-105 Off-ramp Widening at South Prairie Avenue).

**Mitigation Measure 3.14-9(e):** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Mitigation Measure 3.14-9(f):** Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b).

**Mitigation Measure 3.14-9(g):** Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).

**Basis for Finding:** The combined effect of the above mitigation measures would be improved operations of streets in the vicinity of the Proposed Project, which would result in less overall delay and vehicle queuing. Additionally, widening and/or lane reassignments on each of the impacted off-ramps would improve their capacity and ability to store vehicles. The following describes how impacted off-ramps would be improved (for the more critical weekday pre-event peak hour):

At the I-405 Northbound off-ramp at West Century Boulevard, the maximum vehicle queue would be reduced from an estimated 4,075 feet (without mitigation) to 2,325 feet with mitigation, which is less than the applicable 3,600-foot storage. Thus, storage would be adequate with mitigation.

At the I-105 Westbound off-ramp at Crenshaw Boulevard, the maximum vehicle queue would be reduced from an estimated 5,465 feet (without mitigation) to 3,194 feet with mitigation, which is less than the applicable 4,065-foot storage. Thus, storage would be adequate with mitigation.

The surface street improvements and traffic management strategies would result in a small decrease in the maximum queue at the I-405 southbound off-ramps onto La Cienega Boulevard. However, the more southerly ramp (south of West Century Boulevard) would continue to exceed the applicable storage threshold.

If implemented, these measures would reduce the off-ramp queues to within the applicable ramp storage threshold at two of the three impacted off-ramps during the weekday and weekend pre-event peak hours. However, the maximum queue at the I-405 southbound off-ramp onto La Cienega (south of West Century Boulevard) would continue to exceed the applicable storage threshold. These improvements are subject to approval by Caltrans. The City finds that Caltrans can and should authorize this improvement. (CEQA Guidelines, § 15091(a)(2).) Because their implementation cannot be guaranteed, however, the freeway component impacts are considered to be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**9. Impact 3.14-10: Certain components of the Proposed Project would generate VMT in excess of applicable thresholds. (Refer to pages 3.14-244 through 3.14-245 of the Draft EIR.)**

**Mitigation Measure 3.14-10(a):** Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b).

**Mitigation Measure 3.14-10(b):** The project applicant shall operate a shuttle to transport hotel guests between the hotel and Los Angeles International Airport, if warranted by demand.

**Basis for Finding:** As the significance thresholds for events, the hotel, and the regional retail use is any net increase in VMT, these measures would reduce the magnitude of the impacts on VMT but would not reduce them to less than significant. The Proposed Project impacts on VMT would be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**10. Impact 3.14-11: Operation of the Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under Adjusted Baseline conditions. (Refer to pages 3.14-245 through 3.14-247 of the Draft EIR.)**

**Mitigation Measure 3.14-11(a):** Implement Mitigation Measures 3.14-2(a) (Event Transportation Management Plan), 3.14-2(b) (TDM Program), and the entirety of intersection improvements identified in Mitigation Measures 3.14-2 and 3.14-3.

**Mitigation Measure 3.14-11(b):** Implement Mitigation Measure 3.14-3(f), to extend the proposed shuttle bus pull-out on the east side of South Prairie Avenue to the South Prairie Avenue/West Century Boulevard intersection.

**Basis for Finding:** Implementation of Mitigation Measure 3.14-11(a) is expected to improve traffic operations in the study area surrounding the Proposed Project, which would thereby reduce congestion on South Prairie Avenue and West Century Boulevard affecting public bus operations and congestion on South Prairie Avenue that could block ingress or egress from the turnout. Moreover, implementation of the Event TMP would require that the Arena operator to provide sufficient shuttles to ensure that there is successful and convenient connectivity with short wait times to light rail stations such that peak wait times before or after major events does not exceed 15 minutes. As such, implementation of Mitigation

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Measure 3.14-11(a), the Event TMP, would reduce transit impacts associated with public bus operations and attendees using shuttles to access light rail.

Mitigation Measure 3.14-11(b) would provide additional load/unload area for shuttles and would also allow for the lane to serve as a bus queue jumper (operated by traffic control officers) at the South Prairie Avenue/West Century Boulevard intersection during the pre-event and post-event period.

Since these mitigation measures would reduce but not eliminate project impacts on traffic operational conditions, the impacts on public bus operations are considered significant and unavoidable. Implementation of Mitigation Measure 3.14-11(b), when paired with implementation of Mitigation Measure 3.14-11(a) the Event TMP, would reduce transit impacts associated with attendees using shuttles to access light rail to less than significant.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**11. Impact 3.14-15: The Proposed Project would substantially affect circulation for a substantial duration of construction under Adjusted Baseline conditions. (Refer to pages 3.14-251 through 3.14-254 of the Draft EIR.)**

**Mitigation Measure 3.14-15:** Before issuance of grading permits for any phase of the Project, the project applicant shall prepare a detailed Construction Traffic Management Plan that will be subject to review and approval by the City Department of Public Works, in consultation with affected transit providers and local emergency service providers. The plan shall ensure that acceptable operating conditions on local roadways are maintained. At a minimum, the plan shall include:

- a) Identification of haul routes and truck circulation patterns; not permitting trucks to travel on residential streets.
- b) Time of day of arrival and departure of trucks.
- c) Limitations on the size and type of trucks; provision of a staging area with a limitation on the number of trucks that can be waiting; not permitting trucks to park or stage on residential streets.
- d) Preparation of worksite traffic control plan(s) for lane and/or sidewalk closures.
- e) Identification of detour routes and signing plan for street/lane closures.
- f) Provision of driveway access plan so that safe vehicular, pedestrian, and bicycle movements are maintained (e.g., steel plates, minimum distances of open trenches, and private vehicle pick up and drop off areas).
- g) Maintain safe and efficient access routes for emergency vehicles and transit.<sup>5</sup>
- h) Manual traffic control when necessary.
- i) Provisions for pedestrian and bicycle safety.

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<sup>5</sup> 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.)

- j) Identification of locations for construction worker parking; not permitting construction worker parking on residential streets.
- k) Strategies to reduce the proportion of employee and delivery trips made during weekday AM and PM peak hours through employee shift and construction material delivery scheduling.
- l) Strategies to be undertaken (e.g., alternate routing/parking of employees and deliveries, etc.) to reduce the adverse effects during events at The Forum or NFL Stadium of construction-related closures of travel lanes along the project frontage.

**Basis for Finding:** The implementation of the above mitigation measure would reduce the significance of this impact, but not to a less-than-significant level. Lane closures at the South Prairie Avenue/West Century Boulevard intersection would cause temporary, but noticeable worsening of traffic conditions throughout construction. This impact is considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**12. Impact 3.14-16: Operation of the Proposed Project ancillary land uses would cause significant impacts at intersections under cumulative conditions. (Refer to pages 3.14-254 through 3.14-257 of the Draft EIR.)**

**Mitigation Measure 3.14-16(a):** Implement Mitigation Measure 3.14-1(a) (Elements of the TDM Program for daytime and non-event employees).

**Mitigation Measure 3.14-16(b):** Implement Mitigation Measure 3.14-3(f) (Implement northbound exclusive right-turn lane and overlap phase on South Prairie Avenue at West Century Boulevard).

**Mitigation Measure 3.14-16(c):** Implement Mitigation Measure 3.14-2(g) (I-105 Off-Ramp Widening at South Prairie Avenue).

**Basis for Finding:** The modification at the South Prairie Avenue/I-105 off-ramp/112th Street intersection, if implemented, would improve operations from LOS E (with project) to D (with project and mitigation) during the weekday PM peak hour, thereby mitigating this impact to less than significant. The City finds that Caltrans can and should authorize the improvement at the I-105 offramp. (CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that this improvement will be authorized. Since the improvement involves another jurisdiction in addition to the City of Inglewood, however, its implementation cannot be guaranteed and the impact is considered to be significant and unavoidable. The addition of a northbound left-turn lane at the South Prairie Avenue/West Century Boulevard intersection does not improve its operation during this time period, but does benefit operations during other time periods and scenarios.

The combined effectiveness of the above mitigation measures is displayed on Table 3.14-61, on page 3.14-256 of the EIR. Of the four significant intersection impacts identified, the above mitigation measures would cause one to become less than significant. None of the physical improvements described above would require additional right-of-way; however, some would require coordination with other responsible agencies. The City finds that Caltrans can and should authorize the improvement at the I-105 offramp.

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(CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that this improvement will be authorized. Thus, for the various reasons described here, these impacts are considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**13. Impact 3.14-17: Daytime events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions. (Refer to pages 3.14-257 through 3.14-264 of the Draft EIR.)**

**Mitigation Measure 3.14-17(a):** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Mitigation Measure 3.14-17(b):** Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).

**Mitigation Measure 3.14-17(c):** Implement Mitigation Measure 3.14-2(c) (West Century Boulevard/La Cienega Boulevard Improvements).

**Mitigation Measure 3.14-17(d):** Implement Mitigation Measure 3.14-2(d) (West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard Improvements).

**Mitigation Measure 3.14-17(e):** Implement Mitigation Measure 3.14-3(f) (South Prairie Avenue/West Century Boulevard Improvements).

**Mitigation Measure 3.14-17(f):** Implement Mitigation Measure 3.14-2(f) (West 104th Street/Yukon Avenue Improvements).

**Mitigation Measure 3.14-17(g):** Implement Mitigation Measure 3.14-2(g) (I-105 Off-ramp Widening at South Prairie Avenue).

**Mitigation Measure 3.14-17(h):** Implement Mitigation Measure 3.14-2(h) (Manchester Boulevard/La Brea Avenue Improvements).

**Mitigation Measure 3.14-17(i):** Implement Mitigation Measure 3.14-2(i) (Manchester Boulevard/Crenshaw Boulevard Avenue Improvements).

**Mitigation Measure 3.14-17(j):** Implement Mitigation Measure 3.14-2(j) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).

**Mitigation Measure 3.14-17(k):** Implement Mitigation Measure 3.14-2(k) (South Prairie Avenue/120th Street Improvements).

**Mitigation Measure 3.14-17(l):** Implement Mitigation Measure 3.14-2(l) (Crenshaw Boulevard/120th Street Improvements).



**Mitigation Measure 3.14-17(m):** Implement Mitigation Measure 3.14-2(m) (Provide TCOs on Crenshaw Boulevard at 120th Street during post-event period as part of Event TMP).

**Mitigation Measure 3.14-17(n):** Implement Mitigation Measure 3.14-2(n) (La Brea Avenue/Centinel Avenue Improvements).

**Mitigation Measure 3.14-17(o):** Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS Program).

**Mitigation Measure 3.14-17(p):** Implement Mitigation Measure 3.14-3(c) (I-405 NB Off-Ramp Restripe at West Century Boulevard).

**Mitigation Measure 3.14-17(q):** The project applicant shall restripe the northbound approach of Felton Avenue at West Century Boulevard from a single left-through-right lane to one left/through lane and one right-turn lane.

**Basis for Finding:** The combined effectiveness of the above mitigation measures is displayed on Table 3.14-62, on pages 3.14-261 through 3.14-264 of the EIR. Of the 17 significant intersection impacts identified during the weekday AM peak hour, the above mitigation measures would cause four to become less than significant. Of the 59 significant intersection impacts identified during the weekday PM peak hour, the above mitigation measures would cause five to become less than significant. The precise degree of effectiveness of proposed TDM strategies to shift the mode split away from driving and reduce the project's vehicular trip generation is not known. Therefore, mitigation measure testing did not explicitly account for a certain amount of reduced vehicle travel due to TDM strategies. Mitigation measure testing also did not account for the beneficial effects of the TMP because the static intersection analysis methods do not allow for those operational benefits to be quantified. The Event TMP includes placement of TCOs on South Prairie Avenue at the intersection with the West Garage driveway to better facilitate traffic flow. TCOs would facilitate right-turning traffic from West 102nd Street onto South Prairie Avenue. However, the above list of mitigation measures would reduce vehicle travel demand, accommodate the remaining travel demand in a more efficient manner, and provide physical improvements, where feasible, to add capacity to the roadway system. None of the physical improvements described above would require additional right-of-way; however, some would require coordination with other responsible agencies. The City finds that the other agencies (Caltrans, LADOT, City of Hawthorne) can and should authorize these improvements. (CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that these agencies would permit these improvements to be constructed. Thus, for the various reasons described here, these impacts are considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**14. Impact 3.14-18: Major events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions. (Refer to pages 3.14-265 through 3.14-288 of the Draft EIR.)**

**Mitigation Measure 3.14-18(a):** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

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**Mitigation Measure 3.14-18(b):** Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).

**Mitigation Measure 3.14-18(c):** Implement Mitigation Measure 3.14-3(c) (I-405 NB Off-Ramp Restripe at West Century Boulevard).

**Mitigation Measure 3.14-18(d):** Implement Mitigation Measure 3.14-2(d) (West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard Improvements).

**Mitigation Measure 3.14-18(e):** Implement Mitigation Measure 3.14-3(e) (Protected or protected/permissive eastbound/westbound left turns at South Prairie Avenue/Pincay Drive).

**Mitigation Measure 3.14-18(f):** Implement Mitigation Measure 3.14-3(f) (Northbound Exclusive Right-turn Lane and TCO support at South Prairie Avenue/West Century Boulevard).

**Mitigation Measure 3.14-18(g):** Implement Mitigation Measure 3.14-2(g) (I-105 Off-Ramp Widening at South Prairie Avenue).

**Mitigation Measure 3.14-18(h):** Implement Mitigation Measure 3.14-2(j) (I-105 Off-ramp Widening at Crenshaw Boulevard).

**Mitigation Measure 3.14-18(i):** Implement Mitigation Measure 3.14-2(l) (Crenshaw Boulevard/120th Street Improvements).

**Mitigation Measure 3.14-18(j):** Implement Mitigation Measure 3.14-3(j) (La Cienega Boulevard/Centinela Avenue Improvements).

**Mitigation Measure 3.14-18(k):** Implement Mitigation Measure 3.14-2(n) (La Brea Avenue/Centinela Avenue Improvements).

**Mitigation Measure 3.14-18(l):** Implement Mitigation Measure 3.14-3(l) (South Prairie Avenue/West 104th Street Improvements).

**Mitigation Measure 3.14-18(m):** Implement Mitigation Measure 3.14-2(e) (West 104th Street/Yukon Avenue Improvements).

**Mitigation Measure 3.14-18(n):** Implement Mitigation Measure 3.14-2(i) (Manchester Boulevard/Crenshaw Boulevard Improvements).

**Mitigation Measure 3.14-18(o):** Implement Mitigation Measure 3.14-3(o) (Coordinate and Optimize Traffic Signals).

**Mitigation Measure 3.14-18(p):** Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS program).

**Mitigation Measure 3.14-18(q):** Implement Mitigation Measure 3.14-17(q) (Felton Avenue/West Century Boulevard Improvements).

**Mitigation Measure 3.14-18(r):** Implement Mitigation Measure 3.14-2(h) (Manchester Boulevard La Brea Avenue Improvements).

**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

**Basis for Finding:** The following subsection describes specifically how the Event TMP under Mitigation Measure 3.14-18(a) would modify lanes and operations under Cumulative conditions at the West Century Boulevard/I-405 northbound on-ramp and Hawthorne Boulevard/West Century Boulevard intersection. The Event TMP includes placement of TCOs and temporary lane changes through the use of cones during post-event conditions at West Century Boulevard at the I-405 northbound on-ramp from two through lanes and one shared through-right turn lane to two through lanes and one dedicated right turn lane. The Event TMP includes placement of TCOs and temporary lane changes through the use of cones during pre-event conditions at the northbound approach of Hawthorne Boulevard to West Century Boulevard to 2 through lanes and 2 dedicated right-turn lanes.

Deployment of electronic CMS and/or blank-out signs (depending on location and the nature of the message) could be considered at these locations in lieu of TCOs. Experience from other venues has determined that it is preferable to evaluate the effectiveness of TCOs and special event staff deployment before deciding, in consultation with the City Traffic Engineer, whether permanent electronic signs would be effective and economical.

The combined effectiveness of the above mitigation measures is displayed on Table 3.14-63, on pages 2.14-272 through 2.14-288 of the Draft EIR. Based on network-level microsimulation analysis, under major event conditions, the mitigations at major bottlenecks often result in increased traffic flow at adjacent and/or downstream intersections. Improving the flow at major bottleneck locations, although desirable, can cause secondary, significant impacts. The following describes their combined effectiveness during each peak hour.

#### Weekday Pre-Event Peak Hour

Of the 61 significant intersection impacts, the above mitigation measures would cause ten to become less than significant. In some cases, these mitigation measures improved traffic flow at one or more intersections, which resulted in degraded operations at others by relieving an upstream bottleneck or causing queues to spillback to a nearby intersection, worsening its operations. This occurred at eight such intersections. Opportunities for physical or further operational/signal timing improvements at these locations were investigated, but no feasible mitigations were identified. The inability of the mitigation measures to materially improve traffic flow under Cumulative Plus Project conditions is evidenced by the

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percent demand served (averaged across all intersections) in the microsimulation remaining at 78 percent, without and with the recommended mitigations. The mitigation measures are less effective than under adjusted baseline conditions due to background traffic growth.

#### Weekday Post-Event Peak Hour

Of the 21 significant intersection impacts, the above mitigation measures would cause 13 to become less than significant. No intersections would experience a secondary, significant impact due to these mitigation measures. The average percent demand served at the intersections analyzed using microsimulation increased from 92 percent (Adjusted Baseline Plus Project without mitigation) to 98 percent with the recommended mitigation measures in place. The post-event mitigation measures proved much more effective than the pre-event mitigation measures because background traffic levels (upon which project trips would be added) are much lower after events versus prior to events.

#### Weekend Pre-Event Peak Hour

Of the 40 significant intersection impacts identified during the weekend pre-event peak hour, the above mitigation measures would cause six to become less than significant. These mitigation measures would cause an additional six intersections to become new secondary, significantly impacted locations. The average percent demand served at the intersections analyzed using microsimulation increased from 84 percent (Adjusted Baseline Plus Project without mitigation) to 87 percent with the recommended mitigation measures in place.

Mitigation measure testing did not consider the effect of TDM strategies on travel demand due to the uncertainty of precisely quantifying their beneficial effect during special events. However, the above list of mitigation measures would reduce vehicle travel demand, accommodate the remaining travel demand in a more efficient manner, and provide physical improvements, where feasible, to add capacity to the roadway system. None of the physical improvements described above would require additional right-of-way; however, some would require coordination with other responsible agencies. The City finds that the other agencies (e.g. Caltrans) can and should authorize these improvements. (CEQA Guidelines, § 15091(a)(2).) The City also finds that LADOT can and should use the applicant's contribution to LADOT's ITS system to improve the operation of that system. (CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that these agencies would permit these improvements to be constructed. Thus, for the various reasons described here, these impacts are considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**15. Impact 3.14-19: Operation of the Proposed Project ancillary land uses would cause significant impacts on neighborhood streets under cumulative conditions. (Refer to pages 3.14-289 through 3.14-290 of the Draft EIR.)**

**Mitigation Measure 3.14-19(a):** Implement Neighborhood Traffic Management Plan component of Event TMP, which is contained in Mitigation Measure 3.14-2(a).

**Mitigation Measure 3.14-19(b):** Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).

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**Basis for Finding:** At this time, the effectiveness of the NTMP toward reducing traffic levels on impacted neighborhood streets to acceptable thresholds cannot be guaranteed. Therefore, this impact is considered significant and unavoidable. However, the Event TMP includes a performance standard that requires reducing traffic volumes on local and collector street segments identified in the EIR as having a significant impact without causing a significant impact on other local and collector street segments and discouraging and reducing event-related cut-through traffic while maintaining access for residents and their guests.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**16. Impact 3.14-20: Daytime events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions. (Refer to pages 3.14-290 through 3.14-291 of the Draft EIR.)**

**Mitigation Measure 3.14-20:** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Basis for Finding:** The Event TMP, which can be found in Appendix K.4, includes a chapter on neighborhood traffic protection including the need for the project applicant to develop and implement a NTMP. At this time, the effectiveness of the NTMP toward reducing traffic levels on impacted neighborhood streets to acceptable thresholds cannot be guaranteed. Therefore, this impact is considered significant and unavoidable. However, the Event TMP includes a performance standard that requires reducing traffic volumes on local and collector street segments identified in the EIR as having a significant impact without causing a significant impact on other local and collector street segments and discouraging and reducing event-related cut-through traffic while maintaining access for residents and their guests.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**17. Impact 3.14-21: Major events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions. (Refer to pages 3.14-291 through 3.14-292 of the Draft EIR.)**

**Mitigation Measure 3.14-21:** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Basis for Finding:** The Event TMP, which can be found in Appendix K.4, includes a chapter on neighborhood traffic protection including the need for the project applicant to develop and implement a

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NTMP. At this time, the effectiveness of the NTMP toward reducing traffic levels on impacted neighborhood streets to acceptable thresholds cannot be guaranteed. Therefore, this impact is considered significant and unavoidable. However, the Event TMP includes a performance standard that requires reducing traffic volumes on local and collector street segments identified in the EIR as having a significant impact without causing a significant impact on other local and collector street segments and discouraging and reducing event-related cut-through traffic while maintaining access for residents and their guests.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**18. Impact 3.14-23: Daytime events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions. (Refer to pages 3.14-292 through 3.14-293 of the Draft EIR.)**

**Mitigation Measure 3.14-23(a):** Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b).

**Mitigation Measure 3.14-23(b):** Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).

**Basis for Finding:** The freeway component impacts are considered to be significant and unavoidable despite the presence of the above mitigation measures. The City finds that Caltrans can and should implement traffic management system improvements along the I-105 corridor, as identified under Mitigation Measure 3.14-8(b). (CEQA Guidelines, § 15091(a)(2).) Implementation of these measures cannot be assured. Moreover, these improvements would not guarantee that operations at each impacted component would be restored to 'no project' levels.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**19. Impact 3.14-24: Major events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions. (Refer to pages 3.14-293 through 3.14-295 of the Draft EIR.)**

**Mitigation Measure 3.14-24(a):** Implement mitigation measure 3.14-3(h) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).

**Mitigation Measure 3.14-24(b):** Implement Mitigation Measure 3.14-3(c) (Restripe I-405 NB Off-Ramp at West Century Boulevard).

**Mitigation Measure 3.14-24(c):** Implement Mitigation Measure 3.14-3(o) (Retime and optimize traffic signals on Inglewood streets).

**Mitigation Measure 3.14-24(d):** Implement Mitigation Measure 3.14-3(g) (I-105 Off-ramp Widening at South Prairie Avenue).

**Mitigation Measure 3.14-24(e):** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Mitigation Measure 3.14-24(f):** Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b)

**Mitigation Measure 3.14-24(g):** Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).

**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.

**Basis for Finding:** The combined effect of the above mitigation measures would be improved operations of streets in the vicinity of the Proposed Project, which would result in less overall delay and vehicle queuing. Additionally, widening and/or lane reassignments on each of the impacted off-ramps would improve their capacity and ability to store vehicles. The following describes how impacted off-ramps would be improved for the more critical weekday (versus weekend) pre-event peak hour:

- At the I-105 off-ramp at South Prairie Avenue, the maximum vehicle queue would be reduced from an estimated 9,150 feet (without mitigation) to 4,875 feet with mitigation, which is less than the applicable 8,720-foot storage. Thus, storage would be adequate with mitigation.
- At the I-105 Westbound off-ramp at Crenshaw Boulevard, the maximum vehicle queue would be reduced from an estimated 5,973 feet (without mitigation) to 3,671 feet with mitigation, which is less than the applicable 4,065-foot storage. Thus, storage would be adequate with mitigation.
- The surface street improvements and traffic management strategies would result in small decreases in the maximum queue at the I-405 northbound and southbound off-ramps at West Century Boulevard. However, the northbound off-ramp and the more southerly southbound off-ramp (south of West Century Boulevard) would continue to exceed the applicable storage threshold.

These mitigation measures, if implemented, would reduce two of the impacted off-ramp queues to within the available ramp storage during the weekday and weekend pre-event peak hours, thereby mitigating this impact to less than significant. However, the maximum queue at the I-405 northbound off-ramp onto West Century Boulevard and at the I-405 southbound off-ramp onto La Cienega (south of West Century Boulevard) would continue to exceed the applicable storage threshold. The City finds that the other agencies (e.g. Caltrans) can and should authorize these improvements. (CEQA Guidelines, § 15091(a)(2).) The City also finds that Caltrans can and should use the applicant's contribution to the I-405 ATM system to improve the operation of that system. (CEQA Guidelines, § 15091(a)(2).) Because the improvements involve another jurisdiction in addition to the City of Inglewood, however, their implementation cannot be guaranteed and the impacts are considered to be significant and unavoidable. 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.

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**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**20. Impact 3.14-25: The Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions. (Refer to pages 3.14-295 through 3.14-297 of the Draft EIR.)**

**Mitigation Measure 3.14-25(a):** The project applicant shall implement Mitigation Measures 3.14-2(a) (Event Transportation Management Plan), 3.14-2(b) (TDM Program), and the entirety of the intersection improvements in Mitigation Measures 3.14-2 and 3.14-3.

**Mitigation Measure 3.14-25(b):** The project applicant shall implement Mitigation Measure 3.14-11(b) to lengthen the proposed shuttle pull-out.

**Basis for Finding:** Implementation of Mitigation Measure 3.14-25(a) is expected to improve traffic operations in the study area surrounding the Proposed Project, which would thereby reduce congestion on South Prairie Avenue and West Century Boulevard affecting public bus operations and would reduce congestion on South Prairie Avenue that could block ingress or egress from the turnout. Moreover, implementation of the Event TMP would require that the Arena operator to provide sufficient shuttles to ensure that there is successful and convenient connectivity with short wait times to light rail stations such that peak wait times before or after major events does not exceed 15 minutes. As such, implementation of Mitigation Measure 3.14-25(a) would reduce transit impacts associated with public bus operations and attendees using shuttles to access light rail.

Since these measures would reduce but not eliminate cumulative project impacts on traffic operational conditions, the impacts on public bus operations are considered significant and unavoidable. Mitigation measure 3.14-25(a) and 25(b) would reduce transit impacts associated with attendees using shuttles to access light rail under cumulative conditions to less than significant.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**21. Impact 3.14-27: The Proposed Project would substantially affect circulation for a substantial duration of construction under cumulative conditions. (Refer to pages 3.14-298 through 3.14-299 of the Draft EIR.)**

**Mitigation Measure 3.14-27:** The project applicant shall implement Mitigation Measure 3.14-15, Construction Traffic Management Plan.

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**Basis for Finding:** The implementation of the above mitigation measure would reduce the significance of this impact, but not to a less-than-significant level. Lane closures at the South Prairie Avenue/West Century Boulevard intersection would cause temporary, but noticeable worsening of traffic conditions throughout construction. This impact is considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**22. Impact 3.14-28: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts at intersections under Adjusted Baseline conditions. (Refer to pages 3.14-449 through 3.14-477 of the Draft EIR.)**

**Mitigation Measure 3.14-28(a):** Implement Mitigation Measures 3.14-3(a) through 3.14-3(o).

**Mitigation Measure 3.14-28(b):** Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS program).

**Mitigation Measure 3.14-28(c):** On days with concurrent events at The Forum, the City shall coordinate the Event TMP with the operator of The Forum to expand traffic control officer coverage and implement temporary lane assignments through the use of cones as follows:

- At South Prairie Avenue and Arbor Vitae Street under pre-event conditions, through the use of cones and signs temporarily suspend curb parking to allow approximately 150' eastbound right turn pocket; lane widths may be reduced to approximately 11' to accommodate the turn pocket. This modification reduces a bottleneck during the pre-event peak hour that affects upstream traffic.
- At Hawthorne Boulevard and West Century Boulevard, through the placement of a TCO and cones, temporarily reassign the northbound approach as 2 left turn lanes, 2 through lanes, and 2 right turn lanes, allowing a northbound right turn phase overlap with the westbound left turns.

**Mitigation Measure 3.14-28(d):** On days with concurrent events at the NFL Stadium, the City shall coordinate the Event TMP with the operator of the NFL Stadium Transportation Management and Operations Plan (TMOP).

**Mitigation Measure 3.14-28(e):** Implement Mitigation Measure 3.14-2(c) (West Century Boulevard/La Cienega Boulevard Improvements).

**Mitigation Measure 3.14-28(f):** The City of Inglewood shall require the NFL Stadium TMOP to incorporate special traffic management provisions to cover conditions during which attendees to an NFL football game would utilize parking within the Project garages.

**Basis for Finding:** Mitigation Measures 3.14-3(a) and 3.14-3(b) identified within Mitigation Measure 3.14-28(a) require implementation of the Event TMP and TDM program, respectively. Mitigation Measures 3.14-3(c) – (n) identified within Mitigation Measure 3.14-28(a) and 3.14-2(c) identified within Mitigation Measure 3.14-28(e) consist of physical and/or operational improvements at a variety of surface

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streets and freeway off-ramps significantly impacted by the Proposed Project. Mitigation Measure 3.14-3(o) requires coordination with the City to operate corridors with coordinated, special event signal timings.

Mitigation Measure 3.14-28(b) requires a contribution to the ITS Program; refer to Mitigation Measure 3.14-2(o) for details of the ITS Program. The financial contribution shall be available for ITS improvements at the following intersections and to the corridors where these intersections are located. The list below contains only those intersections that are significantly impacted (under either/both Adjusted Baseline or cumulative conditions) due to a Major Event at the Proposed Project operating concurrently with an event at The Forum (i.e., they are not listed in Mitigation Measure 3.14-2(o)).

- Hillcrest Boulevard/Florence Avenue
- Arbor Vitae Street/La Brea Avenue
- West Century Boulevard/Van Ness Avenue
- Yukon Avenue/Imperial Highway
- Crenshaw Boulevard/Manchester Boulevard

The modifications included in Mitigation Measure 3.14-28(c) would improve operations throughout the network, particularly along South Prairie Avenue and West Century Boulevard approaching the Project Site and The Forum. The ability to implement these measures would depend, in part, on The Forum venue operator's willingness to share information with the Project operator. In March 2020, press reports announced that a company affiliated with the project applicant reached agreement with the Madison Square Garden Company (MSG) to acquire The Forum, which may allow for better information sharing and coordination on event scheduling at the two venues.

Mitigation Measure 3.14-28(d) requires the City to coordinate with operators of the NFL Stadium TMOP and the Event TMP on days with concurrent events at each venue. This would allow each plan to operate more efficiently and in coordination with each other.

Mitigation Measure 3.14-28(f) requires the City to ensure that the NFL Stadium TMOP operator conducts traffic management at Proposed Project garages in a manner generally consistent with the Event TMP for conditions in which NFL football game attendees park in these garages, and the Proposed Arena is otherwise not utilized.

The combined effectiveness of the above mitigation measures is displayed on Table 3.14-98, on pages 3.14-462 through 3.14-477 of the EIR, for Scenario 1 (with The Forum). Based on network-level microsimulation analysis, under major event conditions, the mitigations at major bottlenecks often result in increased traffic flow at adjacent and/or downstream intersections. Improving the flow at major bottleneck locations, although desirable, can cause secondary, significant impacts. The following describes their effectiveness during each peak hour.

#### Weekday Pre-Event Peak Hour

Of the 61 significant intersection impacts, the above mitigation measures would cause 15 to become less than significant. These mitigation measures would not cause any otherwise not significantly impacted intersections to become a secondary, significant impact. The average percent demand served at the intersections analyzed using microsimulation increased from 58 percent (Adjusted Baseline (With The Forum) Plus Project without mitigation) to 71 percent with the recommended mitigation measures in place.

#### Weekday Post-Event Peak Hour

Of the 45 significant intersection impacts, the above mitigation measures would cause ten to become less than significant. These mitigation measures would cause an additional three intersections to become new secondary, significantly impacted locations. Opportunities for physical or further operational/signal timing improvements at these locations were investigated, but no feasible mitigations were identified. The average percent demand served at the intersections analyzed using microsimulation increased from 65 percent (Adjusted Baseline (With The Forum) Plus Project without mitigation) to 69 percent with the recommended mitigation measures in place.

#### Weekend Pre-Event Peak Hour

Of the 41 significant intersection impacts identified during the weekend pre-event peak hour, the above mitigation measures would cause 15 to become less than significant. These mitigation measures would cause an additional three intersections to become new secondary, significantly impacted locations. The average percent demand served at the intersections analyzed using microsimulation increased from 79 percent (Adjusted Baseline (With The Forum) Plus Project without mitigation) to 85 percent with the recommended mitigation measures in place.

The precise degree of effectiveness of proposed TDM strategies to shift the mode split away from driving and reduce the project's vehicular trip generation is not known. Therefore, mitigation measure testing did not explicitly account for a certain amount of reduced vehicle travel due to TDM strategies. The above list of mitigation measures would reduce vehicle travel demand, accommodate the remaining travel demand in a more efficient manner, and provide physical improvements, where feasible, to add capacity to the roadway system. None of the physical improvements described above would require additional right-of-way. Some of these improvements fall within the jurisdiction of an agency other than the City. The City finds that the other agencies (e.g. Caltrans) can and should authorize these improvements. (CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that these agencies would permit these improvements to be constructed. Thus, for the various reasons described here, these impacts are considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**23. Impact 3.14-29: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts on freeway facilities under Adjusted Baseline conditions. (Refer to pages 3.14-478 through 3.14-480 of the Draft EIR.)**

**Mitigation Measure 3.14-29(a):** Implement Mitigation Measure 3.14-3(h) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).

**Mitigation Measure 3.14-29(b):** Implement Mitigation Measure 3.14-3(c) (Restripe I-405 NB Off-Ramp at West Century Boulevard).

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**Mitigation Measure 3.14-29(c):** Implement Mitigation Measure 3.14-3(o) (Retime and optimize traffic signals on Inglewood streets).

**Mitigation Measure 3.14-29(d):** Implement Mitigation Measure 3.14-3(g) (I-105 Off-ramp Widening at South Prairie Avenue).

**Mitigation Measure 3.14-29(e):** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Mitigation Measure 3.14-29(f):** Implement the trip reduction measures included in the Project Transportation Demand Management Program described in Mitigation Measure 3.14-2(b).

**Mitigation Measure 3.14-29(g):** Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).

**Basis of Finding:** The combined effect of the above mitigation measures would be improved operations of streets in the vicinity of the Proposed Project, which would result in less overall delay and vehicle queuing. Additionally, widening and/or lane reassignments on several of the impacted off-ramps would improve their capacity and ability to store vehicles. The following describes how impacted off-ramps would be improved in concurrent Scenario 1 (with The Forum) (for the more critical weekday pre-event peak hour):

- At the I-105 off-ramp at South Prairie Avenue, the maximum vehicle queue would be reduced from an estimated 9,175 feet (without mitigation) to 7,700 feet with mitigation, which is less than the applicable 8,720-foot storage. Thus, storage would be adequate with mitigation.
- At the I-105 Westbound off-ramp at Crenshaw Boulevard, the maximum vehicle queue would be reduced from an estimated 6,247 feet (without mitigation) to 3,585 feet with mitigation, which is less than the applicable 4,065-foot storage. Thus, storage would be adequate with mitigation.
- The surface street improvements and traffic management strategies would result in small decreases in the maximum queue at the I-405 northbound and southbound off-ramps at West Century Boulevard. However, the northbound off-ramp and the more southerly southbound off-ramp (south of West Century Boulevard) would continue to exceed the applicable storage threshold.

These mitigation measures, if implemented, would reduce two of the impacted off-ramp queues to within the available ramp storage during the weekday and weekend pre-event peak hours under concurrent Scenario 1, thereby mitigating impacts at these off-ramps to less than significant. However, the maximum queue at the I-405 northbound off-ramp onto West Century Boulevard and at the I-405 southbound off-ramp onto La Cienega (south of West Century Boulevard) would continue to exceed the applicable storage threshold. Some of these improvements fall within the jurisdiction of an agency other than the City. The City finds that the other agencies (e.g. Caltrans) can and should authorize these improvements. (CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that their implementation would be guaranteed and the impacts are considered to be significant and unavoidable.

The queue impacts on the two off-ramps identified above under the other concurrent event scenarios and the freeway segment impacts are considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other

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considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**24. Impact 3.14-30: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would adversely affect public transit operations or fail to adequately provide access to transit under Adjusted Baseline conditions. (Refer to pages 3.14-480 through 3.14-482 of the Draft EIR.)**

**Mitigation Measure 3.14-30(a):** The project applicant shall implement Mitigation Measures 3.14-2(a) (Event Transportation Management Plan), 3.14-2(b) (Transportation Demand Management Program), and the intersection improvements in Mitigation Measures 3.14-2 and 3.14-3.

**Mitigation Measure 3.14-30(b):** The project applicant shall implement Mitigation Measures 3.14-11(b) to lengthen the proposed shuttle pull-out.

**Mitigation Measure 3.14-30(c):** The project applicant shall coordinate with the City and NFL Stadium operator prior to concurrent events to develop a mutually acceptable strategy for accommodating shuttles buses that would transport Project Major Event attendees to/from remote parking locations.

**Basis for Finding:** Mitigation Measure 3.14-30(b) would provide additional load/unload area for shuttles and would also allow for the lane to serve as a bus queue jumper (operated by traffic control officers) at the South Prairie Avenue/West Century Boulevard intersection during the pre-event and post-event period. Moreover, implementation of the Event TMP would require that the Proposed Project to provide sufficient shuttles to ensure that there is successful and convenient connectivity with short wait times to light rail stations such that peak wait times before or after major events does not exceed 15 minutes. As such, implementation of Mitigation Measures 3.14-30(a) and 3.14-30(b) would reduce transit impacts associated with attendees using shuttles to access light rail under a concurrent event scenario.

Mitigation Measure 3.14-30(c) requires coordination with the City and the NFL Stadium operator to develop a strategy for accommodating the shuttle buses required to transport Project Major Event attendees to/from remote parking locations when there is a concurrent event at the Stadium. The draft TMP does not prescribe precisely how many buses should drop-off/pick-up attendees or employees at specific locations for several reasons. First, these types of overlapping events would be rare and will include unique types of artists/attractions, which could influence event start/end times and desire for off-site parking. Real-time planning for such conditions should occur. Second, observations of operating conditions at the NFL Stadium and IBEC will be valuable in understanding where such pick-up/drop-off locations make the most sense (e.g., where can buses most directly access curb space, where are pedestrian areas most accommodating, which areas have reduced travel times to enter/exit, etc.).

Implementation of these mitigation measures would reduce but not eliminate project impacts on traffic operational conditions; as such, the impacts on public bus operations are considered during concurrent events are considered significant and unavoidable. During a concurrent event with the NFL Stadium, project impacts on access to transit are considered significant and unavoidable because a plan has not been prepared to adequately accommodate shuttle bus loadings for each venue. In addition, some of these improvements identified above fall within the jurisdiction of an agency other than the City. The City finds that the other agencies (e.g. Caltrans) can and should authorize these improvements. (CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that their implementation would be guaranteed and the impacts are considered to be significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**25. Impact 3.14-31: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would result in inadequate emergency access under Adjusted Baseline conditions. (Refer to page 3.14-482 of the Draft EIR.)**

**Mitigation Measure 3.14-31:** Implement Mitigation Measure 3.14-14 (Local Hospital Access Plan).

**Basis for Finding:** On the infrequent days when there would be overlapping or concurrent events at the Proposed Project, the NFL Stadium, and/or The Forum, the congestion created would result in significant delays at multiple intersections along the key major corridors accessing the Project area, including West Century Boulevard, South Prairie Avenue, Crenshaw Avenue, Manchester Boulevard, and La Brea/Hawthorne Avenue. Concurrent major events at the Proposed Project and The Forum would cause four freeway offramps along the I-405 and I-105 corridors to experience excessive levels of vehicular queuing during pre-event conditions. Recommended mitigations would be able to reduce the amount of queuing below the applicable threshold at two of those ramps, though vehicle queues would remain lengthy and cause substantial delays to off-ramp traffic at all four locations. Because this scenario would result in increased travel times to exit the freeway and reach surface streets (and since alternative routes are equally congested), the impact on emergency access with concurrent major events is considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**26. Impact 3.14-32: The Proposed Project would substantially affect circulation for a substantial duration during construction during major events at The Forum and/or the NFL Stadium under Adjusted Baseline conditions. (Refer to page 3.14-483 of the Draft EIR.)**

**Mitigation Measure 3.14-32:** The project applicant shall implement Mitigation Measure 3.14-15, Construction Traffic Management Plan.

**Basis for Finding:** As described in Mitigation Measure 3.14-15, the Construction Traffic Management Plan includes strategies for reducing the adverse effects during events at The Forum or NFL Stadium of construction-related closures of travel lanes along the project frontage. The implementation of the above mitigation measure would reduce the significance of this impact, but not to a less-than-significant level. Lane closures at the South Prairie Avenue/West Century Boulevard intersection would cause temporary,

but noticeable worsening of traffic conditions throughout construction, and particularly when events are held at The Forum or NFL Stadium. This impact is considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**27. Impact 3.14-33: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts at intersections under cumulative conditions. (Refer to pages 3.14-483 through 3.14-485 of the Draft EIR.)**

**Mitigation Measure 3.14-33(a):** Implement Mitigation Measures 3.14-18a through 3.14-18(r).

**Mitigation Measure 3.14-33(b):** Implement Mitigation Measure 3.14-28(b) (Additional TCO placement and temporary lane changes at select intersections).

**Mitigation Measure 3.14-33(c):** Implement Mitigation Measure 3.14-28(f) (City of Inglewood shall require the NFL Stadium TMOP to incorporate special traffic management provisions to cover conditions during which attendees to an NFL football game would utilize parking within the Project garages).

**Basis for Finding:** Mitigation Measures 3.14-33(a) and 3.14-33(b) requires implementation of the Event TMP and TDM program, payment into the City's ITS Program, and various physical and/or operational improvements at a variety of surface streets and freeway off-ramps significantly impacted by the Proposed Project.

Mitigation Measure 3.14-33(c) requires the City to coordinate with operators of the NFL Stadium TMOP and the Event TMP on days with concurrent events at each venue. This would allow each plan to operate more efficiently and in coordination with each other.

The combined effectiveness of the above mitigation measures is displayed on Table 3.14-99, on pages 4.14-495 through 4.14-510 of the EIR, for Scenario 1 (with The Forum). Based on network-level microsimulation analysis, under major event conditions, the mitigations at major bottlenecks often result in increased traffic flow at adjacent and/or downstream intersections. Improving the flow at major bottleneck locations, although desirable, can cause secondary, significant impacts. The following describes the effectiveness of the above mitigation measures during each peak hour.

#### Weekday Pre-Event Peak Hour

Of the 71 significant intersection impacts, the above mitigation measures would cause 16 to become less than significant. No intersections would experience a secondary, significant impact due to these mitigation measures. The average percent demand served at the intersections analyzed using microsimulation increased from 60 percent without mitigation 65 percent with the recommended mitigation measures in place.

Weekday Post-Event Peak Hour

Of the 53 significant intersection impacts, the above mitigation measures would cause 14 to become less than significant. Two intersections would experience a secondary, significant impact due to these mitigation measures. The average percent demand served at the intersections analyzed using microsimulation increased from 61 percent without mitigation to 70 percent with the recommended mitigation measures in place.

Weekend Pre-Event Peak Hour

Of the 58 significant intersection impacts, the above mitigation measures would cause eight to become less than significant. These mitigation measures would cause one additional intersection to become new secondary, significantly impacted location. The average percent demand served at the intersections analyzed using microsimulation increased from 72 percent without mitigation to 78 percent with the recommended mitigation measures in place.

The precise degree of effectiveness of proposed TDM strategies to shift the mode split away from driving and reduce the project's vehicular trip generation is not known. Therefore, mitigation measure testing did not explicitly account for a certain amount of reduced vehicle travel due to TDM strategies. The above list of mitigation measures would reduce vehicle travel demand, accommodate the remaining travel demand in a more efficient manner, and provide physical improvements, where feasible, to add capacity to the roadway system. None of the physical improvements described above would require additional right-of-way. Some of these improvements fall within the jurisdiction of an agency other than the City. The City finds that the other agencies (e.g. Caltrans) can and should authorize these improvements. (CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that their implementation would be guaranteed. Thus, for the various reasons described here, these impacts are considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**28. Impact 3.14-34: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts on freeway facilities under cumulative conditions. (Refer to pages 3.14-511 through 3.14-513 of the Draft EIR.)**

**Mitigation Measure 3.14-34(a):** Implement mitigation measure 3.14-3(h) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).

**Mitigation Measure 3.14-34(b):** Implement Mitigation Measure 3.14-3(c) (Restripe I-405 NB Off-Ramp at West Century Boulevard).

**Mitigation Measure 3.14-34(c):** Implement Mitigation Measure 3.14-3(o) (Retime and optimize traffic signals on Inglewood streets).

**Mitigation Measure 3.14-34(d):** Implement Mitigation Measure 3.14-3(g) (I-105 Off-ramp Widening at South Prairie Avenue).

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**Mitigation Measure 3.14-34(e):** Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).

**Mitigation Measure 3.14-34(f):** Implement the trip reduction measures included in the Project Transportation Demand Management Program described in Mitigation Measure 3.14-2(b).

**Mitigation Measure 3.14-34(g):** Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).

**Basis for Finding:** The combined effect of the above mitigation measures would be improved operations of streets in the vicinity of the Proposed Project, which would result in less overall delay and vehicle queuing. Additionally, widening and/or lane reassignments on several of the impacted off-ramps would improve their capacity and ability to store vehicles. The following describes how impacted off-ramps would be improved in concurrent Scenario 1 (with The Forum) (for the more critical weekday pre-event peak hour):

- At the I-105 Westbound off-ramp at Crenshaw Boulevard, the maximum vehicle queue would be reduced from an estimated 6,755 feet (without mitigation) to 3,926 feet with mitigation, which is less than the applicable 4,065-foot storage. Thus, storage would be adequate with mitigation.
- The surface street improvements and traffic management strategies would result in decreases in the maximum queue at the I-405 northbound and southerly southbound off-ramps at West Century Boulevard and at the I-105 westbound off-ramp to South Prairie Avenue. However, the queues on these ramps would continue to exceed the applicable storage threshold.

These mitigation measures, if implemented, would reduce one of the impacted off-ramp queues to within the available ramp storage during the weekday and weekend pre-event peak hours under concurrent Scenario 1, thereby mitigating this impact to less than significant. However, the maximum queues at the I-405 northbound off-ramp onto West Century Boulevard, at the I-405 southbound off-ramp onto La Cienega (south of West Century Boulevard), and at the I-105 off-ramp onto South Prairie Avenue would continue to exceed the applicable storage threshold. Some of these improvements fall within the jurisdiction of an agency other than the City. The City finds that the other agencies (e.g. Caltrans) can and should authorize these improvements. (CEQA Guidelines, § 15091(a)(2).) There are no assurances, however, that their implementation would be guaranteed. Thus, for the various reasons described here, these impacts are considered significant and unavoidable. The queue impacts on the off-ramps under the other concurrent event scenarios and the freeway segment impacts are considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains significant and unavoidable.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**29. Impact 3.14-35: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions. (Refer to pages 3.14-513 through 3.14-514 of the Draft EIR.)**

**Mitigation Measure 3.14-35(a):** The project applicant shall implement Mitigation Measures 3.14-2(a) (Event Transportation Management Plan), 3.14-2(b) (TDM Program), and the entirety of the intersection improvements in Mitigation Measures 3.14-2 and 3.14-3.

**Mitigation Measure 3.14-35(b):** The project applicant shall implement Mitigation Measures 3.14-11(b) to lengthen the proposed shuttle pull-out.

**Mitigation Measure 3.14-35(c):** The project applicant shall coordinate with the City and NFL Stadium TMOP operator prior to concurrent events to develop a mutually acceptable strategy for accommodating shuttles buses that would transport Project Major Event attendees to/from remote parking locations.

**Basis for Finding:** Implementation of these mitigation measures would reduce but not eliminate project impacts on traffic operational conditions; as such, the impacts on public bus operations under a concurrent event scenario are considered significant and unavoidable. During a concurrent event with the NFL Stadium, project impacts on access to transit are considered significant and unavoidable because a plan has not been prepared to adequately accommodate shuttle bus loadings for each venue.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**30. Impact 3.14-36: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would result in inadequate emergency access under cumulative conditions. (Refer to pages 3.14-514 through 3.14-515 of the Draft EIR.)**

**Mitigation Measure 3.14-36:** Implement Mitigation Measure 3.14-14 (Local Hospital Access Plan).

**Basis for Finding:** The above mitigation measure would reduce travel times to access the CHMC once vehicles reach surface streets. However, the added delays motorists would experience during concurrent events while waiting to exit the freeway ramps would remain significant. The implementation of the above mitigation measure would lessen this impact, but not to a less-than-significant level. This impact is considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**31. Impact 3.14-37: The Proposed Project would substantially affect circulation for a**

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**substantial duration during construction during major events at The Forum and/or the NFL Stadium under cumulative conditions. (Refer to pages 3.14-515 through 3.14-516 of the Draft EIR.)**

**Mitigation Measure 3.14-37:** The project applicant shall implement Mitigation Measure 3.14-15, Construction Traffic Management Plan.

**Basis for Finding:** The implementation of the above mitigation measure would reduce the significance of this impact, but not to a less-than-significant level. Lane closures at the South Prairie Avenue/West Century Boulevard intersection would cause temporary, but noticeable worsening of traffic conditions throughout construction. This impact is considered significant and unavoidable.

**Finding:** The City Council finds that there are no additional feasible mitigation measures or alternatives that the City Council could adopt at this time which would reduce this impact to a less-than-significant level. **For these reasons, the impact remains *significant and unavoidable*.**

To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the City Council finds that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the Project as modified, despite this impact.

**Section V. Mitigation Measures and Alternatives Proposed in Comments on the Draft EIR**

The City received a number of comments on the Draft EIR that proposed mitigation measures or alternatives to the Project. The City appreciates these proposals, and has given all of them careful consideration. Many of these proposals have been incorporated into the Project. Other proposals address impacts that are not significant, and the City is therefore not required to incorporate those proposals into the Project. Other proposals are inconsistent with basic objectives of the Project, or are infeasible based on evidence in the record, or would result in other impacts that the City would like to avoid.

The following table lists those comments on the Draft EIR that proposed mitigation measures or alternatives. The City has tried to capture all such proposals in those comments. In the event the table does not list a particular proposal, such omission was inadvertent; for information regarding how the City has addressed such proposals, please refer to the Final EIR's responses to comments, which are incorporated herein by reference.

| Mitigation Measures Proposed in Comments on Draft EIR |   |  |  |
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| Comment   | Comment   | Disposition  | Explanation  |
| PETA-3<br>PETA-7                                      | <p>The DEIR does not consider the potential impact a large, brightly lit arena in Inglewood would have on avian mortality.</p> <p>“To prevent or mitigate the devastating impact that buildings have on birds, architects have developed innovative designs—including films, fritted glass, ultraviolet glass, and architectural features—that have successfully been adopted.”</p> | <p>The project’s potential impact on avian mortality is considered less than significant. For this reason, no mitigation measures are required. In addition, the applicant has incorporated into the arena design features to reduce further potential impacts to avian mortality.</p> | <p>The EIR concludes that the arena structure will not have a significant impact on avian mortality. (Final EIR, Responses to Comments PETA-1 to PETA-7; Draft EIR, Impacts 3.3-1, 3.3-2 and 3.3-4.) Because the impact associated with avian mortality is less than significant, no mitigation measures are required.</p> <p>In addition, the project applicant has committed implementing bird-safe design criteria as part of the base design of the Arena structure, and its compliance with requirements to meet LEED Gold standards. As explained in Response to Comment PETA-7, the text of the Draft EIR has been revised to reflect this commitment, and a corresponding condition of approval has been incorporated into the MMRP. As set forth in Response to Comment PETA-7:</p> <p>“ . . . [T]he project applicant has committed to implementing bird-safe design criteria as part of the base design of the Arena Structure, and its compliance with requirements to meet (LEED Gold standards. As part of achieving LEED Gold certification, the Arena Structure would include design features that would achieve LEED Bird Collision Deterrence credits created by the United States Green Building Council in partnership with the American Bird Conservancy.<sup>40</sup> Further, the Arena Structure has been designed to address the best practices of the USFWS Division of Migratory Bird Management, the recommendations for bird friendly materials established in the City of New York Building Code, and the design criteria for Building Feature-Related Hazards from the City of San Francisco Planning Department’s Design Guide Standards for Bird-Safe</p> |

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|  |  | <p>Buildings. As the Proposed Project is currently in design development, these goals are influencing the further design evolution of the Proposed Project.</p> <p>“Implementation of these design features would be reflected in a façade and roof structure made of translucent polymer<sup>41</sup> panels with a pattern or metal substructure, along with opaque photovoltaic panels. The intention is to use materials with a goal of achieving a maximum threat factor of 25 pursuant to the American Bird Conservancy Bird Collision Deterrence Material Threat Factor Reference Standard. To be consistent with this standard, the project applicant has committed that all externally visible glass panels would be constructed of fritted glass,<sup>42</sup> which is both energy efficient and is perceived by birds as a solid surface, reducing the potential for fatal collisions.</p> <p>“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.</p> <p>“In order to reflect the addition of bird-safe design features to the Proposed Project design, the following changes to the Draft EIR are made.</p> <p>“The following is added to the bottom of Draft EIR, page 3.3-11:</p> <p><b>Project Design Features</b></p> <p>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</p> |
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|  |  | <p>features would be expected to be incorporated as conditions of approval so that they would be enforceable by the City:</p> <p><b><i>Project Design Feature 3.3-1</i></b></p> <p><i>The project applicant would implement the following project design features. These features would be included in applicable construction documents. Design features would include the following:</i></p> <p><i>The Arena Structure would be designed to achieve Leadership in Energy and Environmental Design (LEED) Bird Collision Deterrence credits;</i></p> <p><i>The Arena Structure would be designed to be address the best practices of the United States Fish and Wildlife Service Division of Migratory Bird Management, the recommendations for bird friendly materials established in the City of New York Building Code, and the design criteria for Building Feature-Related Hazards from the City of San Francisco Planning Department's Design Guide Standards for Bird-Safe Buildings;</i></p> <p><i>The Arena façade and envelope composition would be made of translucent polymer<sup>13</sup> panels with a pattern or metal substructure, along with opaque photovoltaic panels. The materials would be selected with of achieving a maximum threat factor of 25 pursuant to the American Bird Conservancy Bird Collision Deterrence Material Threat Factor Reference Standard. To be consistent with this standard, the project applicant has committed that a large majority of externally visible glass panels would include a fritted finish,<sup>14</sup> which is both energy efficient and is perceived by birds as a solid surface, reducing the potential</i></p> |
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|          |  |  | <p><i>for fatal collisions; and</i></p> <p><i>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."</i></p> <p>(Footnote 40: U.S. Green Building Council, LEED BD+C: New Construction – v4.1 – LEED v4.1, <i>Bird Collision Deterrence</i>, <a href="https://www.usgbc.org/credits/new-construction-core-and-shell-schools-new-construction-retail-new-constructionhealthc212?view=language&amp;return=/credits/New%20Construction/v4.1">https://www.usgbc.org/credits/new-construction-core-and-shell-schools-new-construction-retail-new-constructionhealthc212?view=language&amp;return=/credits/New Construction/v4.1</a>, accessed May 4, 2020.)</p> <p>(Footnote 41: Translucent polymer panels would be made of either ethylene tetrafluoroethylene (ETFE) or polytetrafluoroethylene (PTFE).)</p> <p>(Footnote 42: Fritted glass is glass that has been fused with pigmented glass particles.)</p> |
| Gerson-4 | I specifically request that all housing units in the area described as between Prairie Avenue on the western border, Yukon Avenue on the eastern border, 102 <sup>nd</sup> Street on the north border and 104 <sup>th</sup> Street on the south border be offered environmental upgrades including but not | The proposed mitigation measures (1) address impacts that are not significant and for which no mitigation is required, (2) would be ineffective at | <p><u>Air Quality</u></p> <ul style="list-style-type: none"> <li>• The project's air pollutant emissions would not result in a localized significant impact to human health during construction or operations. For this reason, no mitigation is required to address such impacts.</li> <li>• The project would result in a</li> </ul>  |

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|  | <p>limited to sound insulation, air conditioning/ventilation, new windows and filtration to offset the significant increases in noise, vibration and pollution that are mentioned in the EIR.”</p> | <p>addressing the project’s significant impacts, or (3) are considered infeasible.</p> | <p>significant impact with respect to the mass of air pollutant emissions during construction and operations. This impact is regional in character. The project already incorporates design features and mitigation measures to address these impacts, although the impacts remain significant.</p> <ul style="list-style-type: none"> <li>• The measures proposed by Comment Gerson-4 focus on localized emissions. For this reason, the proposed measures focus on impacts that have been determined to be less than significant, for which no mitigation is required.</li> <li>• The installation of insulation is related to sound dampening, and would not affect air pollutant emissions.</li> <li>• The installation of new windows is considered ineffective in light of the character of development in the area and the requirement that such windows be inoperable in order to be effective.</li> <li>• Enhanced filtration that would result from installation of new air conditioning or ventilation systems has been found to be effective only for particulate emissions, and only when combined with inoperable windows.</li> <li>• Not all other property owners or residents may accept the upgrade offers, and thus, mitigation is considered infeasible as it is not capable of being accomplished in a successful manner in a reasonable period of time.</li> </ul> <p>The mitigation measures proposed by the comment are therefore considered either unnecessary, ineffective or infeasible.</p> <p><u>Noise</u></p> <ul style="list-style-type: none"> <li>• The project incorporates</li> </ul> |
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|  |  |  | <p>extensive design features and mitigation measures to address the project's noise impacts during both construction and operations. The impact, however, remains significant.</p> <ul style="list-style-type: none"><li>• Construction noise impacts are intermittent and temporary. For this reason, permanent improvements to address such impacts are not considered reasonable. The mitigation measures incorporated into the project focus appropriately on the episodic and temporary character of construction noise.</li><li>• Construction noise impacts are measured outdoors at the property line. Building upgrades would not reduce outdoor noise levels.</li><li>• The effectiveness of permanent improvements to offsite noise-sensitive receptors in reducing indoor noise is highly dependent on windows and doors remaining closed, which would impede natural ventilation.</li><li>• Not all property owners or residents may be willing to accept the upgrade offers and thus, the measure is infeasible.</li><li>• During project operations, significant noise impacts would not occur at the residences identified by the commenter. For this reason, no mitigation measures are required to address noise impacts at these residences.</li><li>• Mitigation measures proposed by the comment would have no effect on the significant property-line impacts from traffic-generated noise sources identified in the Draft EIR.</li></ul> <p>The mitigation measures proposed by the comment are therefore considered either unnecessary, ineffective or infeasible.</p> |
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|                   |   |   | <p><u>Vibration</u></p> <ul style="list-style-type: none"> <li>No significant vibration impacts would affect the residences addressed in the comment. For this reason, no mitigation measures are required to address vibration impacts at these residences.</li> <li>Suggested building upgrades would not reduce Proposed Project-related construction vibration impacts.</li> </ul> <p>The mitigation measures proposed by the comment are therefore considered either unnecessary or ineffective.</p> <p>See Response to Comment Gerson-4.</p>   |
| <p>LACDPW 1-7</p> | <p>The DEIR only considers LOS E or F results significant; however, multiple County intersections have significant impacts at LOS D, C, etc. thresholds. Please include/denote these significant impacts as well and then address them in the mitigation section.</p> <ul style="list-style-type: none"> <li>Use ICU methodology for all signalized and unsignalized intersections within or shared with the County.</li> <li>Address mitigations for each County impacted intersection.</li> <li>Provide an event management plan to Public Works for review.</li> </ul> | <p>The project incorporates all feasible mitigation to address impacts to the intersections identified by the comment. No additional mitigation has been identified to address these impacts.</p> <p>As requested by the comment, the Event TMP has been revised to expressly require coordination with LACDPW.</p> | <p>The City used the thresholds identified by the comment where appropriate for intersections located within County jurisdiction. For some intersections, microsimulation, rather than the ICU methodology, was used in light of the nature of the project and the times during which event-related traffic would be generated. The EIR’s approach is discussed in detail in Response to Comment LACDPW1-7.</p> <p>Under Adjusted Baseline conditions the Draft EIR identified significant impacts of the Proposed Project at five intersections wholly or partially under the jurisdiction of the County during the AM or PM peak hours for daytime events (some of which were found at LOS C or D) and at three County intersections during the weekday pre-event, weekday post-event, and/or weekend pre-event hours. A number of mitigation measures were identified which could feasibly reduce or eliminate some or all of the identified significant impacts. Mitigation Measure 3.14-2(b) would require the implementation of a TDM Program to reduce Project-related trips, which would in turn reduce the magnitude of Project impacts at all impacted intersections. Mitigation</p> |

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|                          |   |   | <p>Measure 3.14-2(c) would require physical modifications to mitigate impacts at the Century Boulevard/La Cienega Boulevard intersection. Mitigation Measure 3.14-3(o) would require coordination of traffic signals and optimization of traffic signal timings at intersections along West Century Boulevard. No feasible mitigation measures were identified at the remainder of the impacted County intersections. As discussed on pages 3.14-189 and 3.14-190 of the Draft EIR, the majority of the study area is built out, which limits the locations, magnitude, and types of physical improvements that could be constructed on surface streets. Physical improvements, such as roadway widenings, were explored but were found to be either ineffective or infeasible due to the need for right-of-way acquisition.</p> <p>As requested by the comment, Draft EIR, Appendix K.4, Table 1 has been revised to add the following at the bottom of the table:</p> <p style="padding-left: 40px;">County of Los Angeles Department of Public Works (LACDPW)</p> <p style="padding-left: 40px;">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</p> <p>See Response to Comment LACDPW1-7.</p> |
| Espinoza-2<br>Espinoza-3 | Proposed shuttle services will not be enough to mitigate transportation. Consider improving cell phone and internet connectivity near the project site so that attendees can connect with | This proposal is unwarranted. The project includes telecommunications facilities. The project is not expected to have adverse impacts | The comment is correct that large crowds at event venues, such as The Forum, may place increased demands on the capacity of telecommunications facilities. If many patrons attempt to use cell phones at the same time, including connections to ride-hailing services, the capacity of nearby digital systems may  |

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|  | <p>Uber/Lyft drivers.</p> | <p>on telecommunications in the vicinity of the project. In addition, the Event TMP provides for monitoring conditions and upgrading such facilities if capacity problems arise.</p> | <p>be insufficient, leading to slow service, lack of connection, or dropped calls. These peaks in demand may occur immediately before or after events.</p> <p>As stated on page 2-80 of the Draft EIR:</p> <p>A distributed antenna system (DAS) will be installed at the Project Site to provide cellular and emergency communications connections. DAS systems use a series of antennas to distribute signals in dense areas. Antennas can be integrated into building facades, installed on the interiors of building spaces, or be mounted on exterior structures such as poles.</p> <p>The project applicant does not have control over all aspects of cell phone internet connectivity in the vicinity of the Project Site. However, in regards to ridesharing (Uber and Lyft), the Project would construct and operate a rideshare pick-up area as part of the East Transportation Hub. For post-event pick-ups, the Arena itself would be placed in a geofenced area and attendees requesting a rideshare vehicle would be directed to meet the rideshare vehicle at the East Parking Garage. This would be similar to the current approach used at LAX for ride share hailing. This is required as an element of Mitigation Measure 3.14-2(a) and is described further in the Draft Event Transportation Management Plan included in Draft EIR, Appendix K.4. Like other parts of the Event TMP, performance would be monitored and adapted over time. The Event TMP requires annual monitoring to support ongoing adaptation to dynamic event conditions. In the event that the proposed DAS system is insufficient to meet the demands, the monitoring program included in the Event TMP would provide the framework for further expansion of the DAS system ensure effective connectivity that support the implementation of the Proposed</p> |
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|   |  |  | Project’s Event TMP and TDM program. See Response to Comment Espinoza-2.   |
| <p>SCAQMD 3-5</p> <p>SCAQMD 3-14</p> <p>SCAQMD 3-15</p> | <p>For on-road vehicles, the Lead Agency will strive to use heavy-duty trucks with ZE or NZE engines during construction and operation, and, at a minimum, require the use of heavy-duty trucks with 2010 model year engines or trucks with newer, cleaner engines during construction and operation (MMs 3.2-2(c)(3) and MM 3.2-2(d).)</p> <p>Since NZE heavy-duty truck engines are already commercially available, and to further reduce the Proposed Project’s significant construction and operational NOx emissions, the Lead Agency should require more electric construction equipment and use ZE heavy-duty trucks.</p> | <p>These proposals are infeasible.</p> | <p>The project is required to use construction equipment that is commercially available in electric or alternative fueled models. It is not feasible to require the project applicant to use more electric construction equipment than stated in the Draft EIR or zero-emission (ZE) or near-zero emissions (NZE) heavy-duty trucks because such equipment suitable for project construction are not now nor are they expected to be commercially available to meet the construction needs of the project within the project schedule. The heavy-duty NZE trucks that are commercially available have limited applicability to construction-related activities. See Responses to Comments SCAQMD3-5, SCAQMD3-14, SCAQMD3-15 and Ray Gorski, <i>Inglewood Basketball &amp; Entertainment Center Draft EIR: Review of Suggested Mitigation Measures</i>, May, 2020.</p> <p>The proposal to require vendors and suppliers to use ZE and NZE trucks is considered infeasible. It is speculative and uncertain whether vendors will be able to use such trucks. Implementing NZE trucks during operations, as requested by the SCAQMD, would be infeasible as trucks visiting the Project Site would primarily be from third-party vendors or tenants, which may have specific, competing, criterion for selection of vendors. With the limited categories of NZE commercially available trucks, it would be infeasible to require that all trucks serving the Project be NZE. That is particularly true in light of incentives incorporated into the project to provide incentives to rely on local and small business vendors. See Response to Comment SCAQMD3-14 and Ray Gorski, <i>Inglewood Basketball &amp; Entertainment Center Draft EIR: Review of Suggested Mitigation Measures</i>, May,</p> |

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| SCAQMD<br>3-18 | <p>The Lead Agency can and should develop the following performance standards.</p> <ul style="list-style-type: none"> <li>Develop a minimum amount of ZE heavy-duty trucks that the Proposed Project must use each year during construction to ensure adequate progress. Include this requirement in the Proposed Project's Construction Management Plan.</li> </ul> | This proposal is infeasible. | <p>Commercially available ZE and NZE construction vehicles do not have the displacement needed for soil transport and material delivery to and from the Project Site. Mandating exclusive use of ZE or NZE trucks during operations would be infeasible because there is currently limited penetration of NZE and ZE vehicles in the commercial vocations likely to support an event center, and trucks visiting the Project Site would primarily be from third party vendors or tenants who may meet important project applicant and City criteria but that may not have access to ZE and/or NZE delivery vehicles. Thus, because of the uncertainty of the availability in the market of on-road trucks appropriate for construction of the Proposed Project, committing to technology that is not yet commercially available would be speculative and has been determined to be infeasible by the City. Therefore, Mitigation Measure 3.2-2(c)(3) includes all feasible mitigation, as required under CEQA. See Response to Comment SCAQMD3-18.</p> |
|                | <ul style="list-style-type: none"> <li>Establish a contractor(s) selection policy that prefers contractor(s) who can supply ZE heavy-duty trucks during construction. Include this policy in the Request for Proposal for selecting contractor(s).</li> </ul>  | This proposal is infeasible. | <p>There is uncertainty regarding the availability of ZE heavy-duty trucks in the market and that are appropriate for the project construction. Mitigation Measure 3.2-2(c)(3), which incentivizes the use of ZE and NZE vehicles, includes all feasible mitigation. See Response to Comment SCAQMD3-5.</p>  |
|                | <ul style="list-style-type: none"> <li>Establish a policy to select and use vendors that use ZE heavy-duty</li> </ul>  | This proposal is infeasible. | <p>Establishing a policy that requires the selection and use of vendors that use ZE heavy-duty trucks would be infeasible because trucks visiting the Project Site</p>   |

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Subject to Revision

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|  | <p>trucks. Include this policy in the vendor contracts and business agreements.</p>   |                                     | <p>would primarily be from third party vendors or tenants. Based on a review by the City’s air pollution reduction technology expert, the availability of this fleet is unknown. (Ray Gorski, <i>Inglewood Basketball &amp; Entertainment Center Draft EIR: Review of Suggested Mitigation Measures</i>, May, 2020.) Requiring delivery trucks to be ZE could limit to the types of vendors and brands available to the Project, and could limit the project applicant’s ability to achieve commitments to support local small businesses and other similar requirements of the draft Development Agreement. Additionally, it is not currently knowable which vendors or tenants would be present during operations (either at project opening or over time).</p> <p>There is no evidence today that proposed Project suppliers could abide by mandates to provide deliveries and services exclusively or meaningfully using NZE and ZE trucks, and thus a mitigation measure requiring suppliers to do so would be infeasible. The Draft EIR included as much forecasting of the availability of ZE trucks as feasible. As stated previously, Mitigation Measure 3.2-2(d), which requires the use of incentives to enhance the use of ZE and NZE vehicles for vendors and delivery services, represents all feasible mitigation.</p> <p>See Response to Comment SCAQMD3-14.</p> |
|  | <ul style="list-style-type: none"> <li>Establish a purchasing policy to purchase and receive materials from vendors that use ZE heavy-duty trucks to deliver materials. Include this policy in the purchase orders with vendors.</li> </ul> | <p>This proposal is infeasible.</p> | <p>Requiring vendors to use ZE heavy-duty trucks is infeasible as trucks visiting the Project Site would primarily be from third party vendors or tenants serviced by local small businesses through City mandated programs. These local small businesses might not have the ability to secure ZE heavy-duty trucks that larger vendors have access to. With the limited categories of ZE commercially available trucks, it would be infeasible to require</p>   |

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|             |  |  | that trucks serving the Project to be ZE. See Response to Comment SCAQMD3-14.  |
|             | <ul style="list-style-type: none"> <li>Develop a target-focused and performance-based process and timeline to implement the use of ZE heavy-duty trucks.</li> </ul>  | This proposal is infeasible.   | Developing a target-focused and performance-based process and timeline to implement the use of ZE heavy-duty trucks is not feasible at this time since fleets that have purchased or are in the process of purchasing these types of trucks take advantage of incentives offered by CARB, CEC, and SCAQMD programs. It is uncertain when (or the number of) these incentives or programs will be granted, therefore, developing a timeline to implement the use of ZE heavy-duty trucks would be infeasible. Mitigation Measures 3.2-2(c)(3) and 3.2-2(d), which would create incentives for the use of ZE and NZE vehicles for vendors and delivery services, includes all feasible mitigation. See Response to Comment SCAQMD3-14. |
|             | <ul style="list-style-type: none"> <li>Develop a project-specific process and criteria for periodically assessing progress in implementing the use of ZE heavy-duty trucks.</li> </ul>   | This proposal is infeasible.   | Implementing the use of ZE heavy-duty trucks is not feasible at this time. However, as required by Mitigation Measure 3.2-2(c)(3), records of all trucks visiting the Project and within the project applicant's control will be made available to the City upon request. Mitigation Measure 3.2-2(c)(3), which incentivizes the use of ZE and NZE vehicles, includes all feasible mitigation.   |
| SCAQMD 3-19 | Presence of hexavalent chromium has been detected at the Proposed Project site. The Lead Agency should require dust control measures in accordance with South Coast AQMD Rule 1466, as applicable. Rule 1466 includes a list of dust control measures to reduce fugitive dust emissions from toxic air | This proposal is already incorporated into the project pursuant to Mitigation Measure 3.8-4 and the requirement to prepare a Soil Management Plan (SMP). The text of the Draft EIR | As explained in Response to Comment SCAQMD3-19, there is insufficient evidence to indicate that hexavalent chromium is present at elevated levels on the Project site. In particular, there is no history of activities on the site that would indicate that hexavalent chromium is present at actionable levels. However, because impacted soil could be unexpectedly encountered during earth moving activities, Mitigation Measure 3.8-4 requires the project contractor prepare an SMP prior to the  |



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|                                   | <p>contaminants, such as hexavalent chromium, during earth-moving activities. South Coast AQMD staff recommends that the Lead Agency include information on how the Proposed Project will meet the South Coast AQMD Rule 1466 requirements in the Final EIR. The information on Rule 1466 should also be included in the soil management plan.</p>   | <p>has been revised to reference SCAQMD rule 1466.</p>   | <p>issuance of the first permit for ground disturbing activities. The SMP would ensure that work would be stopped in the excavation area if there are indicators that potential contamination has been encountered, samples would be collected and then tested to determine the type and extent of contamination that may be present. The development of an SMP prior to ground disturbing construction activities would be precautionary and is industry practice when completing ground disturbing activities where legacy contaminants have been detected. Any suspect materials would be isolated, protected from wind and runoff, and disposed of in accordance with transport laws and the requirements of the licensed receiving facility and type of contamination. In addition, as explained in Response to Comment SCAQMD3-6, the discussion of applicable rules on page 3.2-30 of the Draft EIR has been revised to include Rule 1466.</p> |
| <p>SCAQMD 3-20<br/>SCAQMD 3-6</p> | <p>Presence of TPH has been detected at the Proposed Project site. Disturbed and excavated soils that may contain petroleum hydrocarbons are subject to the requirements of South Coast AQMD Rule 1166. Excavation operations will need to be monitored for VOC concentrations, and notification, work practice, and handling requirements will need to be implemented for elevated VOC readings. A Rule 1166 excavation plan application will need to be submitted to South Coast AQMD, or the site may be able to utilize a various locations plan. In addition, a discussion should be included regarding the</p> | <p>This proposal is already incorporated into the project by Mitigation Measure 3.8-4 and the requirement to prepare an SMP. The text of the Draft EIR has been revised to reference SCAQMD rule 1166.</p> | <p>Compliance with soil management procedures outlined within the Soil Management Plan (SMP), along with implementation of SCAQMD Rule 1166 during the Proposed Project grading and site preparation phases, would minimize the emission of TACs, ensuring that there would be no possible risk of exposure to TACs by nearby sensitive receptors. The Draft EIR has been revised to reference and require compliance with SCAQMD Rules 1166 and 1466. See Responses to Comments SCAQMD3-20 and SCAQMD3-6.</p>  |

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|                                  | <p>treatment and handling of any VOC-contaminated soil. Therefore, South Coast AQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with South Coast AQMD Rule 1166 in the Final EIR. South Coast AQMD Rule 1166 should be incorporated in the soil management plan.</p>  |  |   |
| <p>Caltrans-5<br/>Caltrans-6</p> | <p>Given that this proposed project would result in significant State facility usage, it is recommended that the developer work closely with Caltrans to identify and implement operational improvements along I-405. Such traffic management system improvements could include, but are not limited to, the following: Active Traffic Management (ATM) and Corridor Management (CM) Strategies such as queue warning, speed harmonization, traveler information; Transportation Management System (TMS) elements such as closed-circuit television cameras (CCTV), changeable message signs (CMS), etc.</p> <p>To mitigate potential impacts on I-405, develop a fair share mitigation agreement that involves improvements to I-405 within the project's vicinity.</p> <p>Per Table K.2-T, K.2-U,</p> | <p>This proposal has been incorporated into the project.</p> | <p>As mitigation for the significant cumulative impacts on the I-405 freeway, based on further consultations with Caltrans, the following mitigation measure is added to the Draft EIR following Mitigation Measure 3.14-24(g) on page 3.14-294:</p> <p><b>Mitigation Measure 3.14-24(h)</b></p> <p><i>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.</i></p> <p>According to the Caltrans Project Initiation Report, the ATM/CM project proposes to add ATM and CM strategies such as queue warning, speed harmonization, dynamic corridor adaptive ramp metering, traveler information, and others on I-405 from Rosecrans Avenue to SR 90. This project also proposes to upgrade transportation management system (TMS) elements including the existing closed-circuit television cameras, changeable message signs, vehicle detection stations, and ramp metering systems within the project limits. Through consultations with Caltrans, the City and Caltrans have mutually determined that a one-time contribution of \$1,524,900 represents the appropriate fair-share contribution to this project, based on the Project's</p> |

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|            | K.2-V, K.2-W, and K.2-X, NB and SB I-405 mainline segments will have direct significant impact(s) due to weaving/merging operation. Please identify mitigation measures, if any.  |   | contribution to cumulative traffic along the I-405 corridor. The technical memorandum entitled <i>IBEC Contribution to Caltrans' I-405/ATM/CM Project</i> <sup>6</sup> presents the calculations used to determine the fair share contribution of \$1,524,900. See Response to Comment Caltrans-5.  |
| Caltrans-7 | MM 3.14-3(c) includes restriping the center lane on the I-405 NB Off-Ramp at West Century Blvd to permit both left and right-turn movements. Caltrans anticipates that the conversion of the middle lane to a shared lane will result in queue for the left turn traffic. Please provide further explanation to justify that the mitigation measure at the I-405 NB off-ramp at West Century Blvd will not lead to significant impacts. | This concern has been addressed. The queue length would not exceed the available storage threshold, so secondary impacts would not occur. | The 95th percentile queue is estimated to increase slightly with the mitigation measure due to the higher volumes of left-turning vehicles relative to the right-turning vehicles during those hours. However, in no case is the queue estimated to exceed the available storage threshold. Therefore, the mitigation measure would not create new secondary impacts. See Response to Comment Caltrans-7. |
| Caltrans-8 | If necessary, widening of the off-ramp to add another right turn lane would be considered as a viable mitigation alternative.   | This proposal is not warranted because the impact to which it refers would not occur.   | Widening the I-405 northbound off-ramp approach to its intersection with West Century Boulevard to add another right-turn lane would not be necessary given that the proposed mitigation measure would not lead to secondary impacts. See Responses to Comments Caltrans-7 and Caltrans-8.  |
| Caltrans-9 | According to the DEIR the following intersections have "Significant Impacts" under one or more scenarios. Please provide more details regarding what mitigation measures were proposed for these intersections and why they are not feasible for this project. If no mitigation   | This proposal is infeasible.  | Mitigation for the impact at this on-ramp is infeasible for the following reasons: <ul style="list-style-type: none"> <li>The westbound Imperial Highway approach already allows right-turns into the high-occupancy vehicle (HOV) bypass lane on the on-ramp from the #3 through lane. Widening the westbound Imperial Highway approach to provide a</li> </ul>  |

<sup>6</sup> Fehr & Peers, *Technical Memorandum, IBEC Contribution to Caltrans' I-405 ATM/CM Project*, May 7, 2020. 17077.001 4847-6266-0032.1

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|  | <p>measures have been identified, Caltrans is able to help the developer identify any viable mitigation measures at the following locations for the proposed project:</p> <ul style="list-style-type: none"><li>• EB I-105 on-ramp from Imperial Highway</li></ul> |  | <p>second exclusive right-turn lane would create a trap situation for non-HOV right-turning movements.</p> <ul style="list-style-type: none"><li>• Limited right-of-way on the eastbound Imperial Highway approach means that a second left-turn lane cannot be added (76 feet curb-to-curb width with seven lanes - no room to add an eighth lane)</li><li>• The northbound Freeman Avenue approach is a small residential street (36 feet curb-to-curb); restriping to provide additional lanes would create a secondary impact related to loss of parking.</li></ul> <p>Wayfinding measures to direct motorists leaving an event to travel west on West Century Boulevard to south on Hawthorne Boulevard to the eastbound I-105 as an alternative to south on South Prairie Avenue to west on Imperial Highway to the eastbound I-105 could be built into the Event Transportation Management Plan and would not require Intelligent Transportation Systems (ITS) on local streets. See Response to Comment Caltrans-9.</p> |
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| <p>17077.001 4847-6266-0032.1<br/> DRAFT (June 12, 2020)<br/> Page [ PAGE ] of [ NUMPAGES ]</p> | <ul style="list-style-type: none"> <li>EB I-105 on/off ramps from 120th Street</li> </ul> | <p>This proposal is infeasible. The City has Subject to Revision alternative mitigation to address this impact. Because the feasibility of this alternative mitigation is uncertain, the impact remains significant.</p> | <p>Mitigation was found to be infeasible for the following reasons:</p> <ul style="list-style-type: none"> <li>The westbound 120th Street approach already allows right-turns into the HOV bypass lane on the on-ramp from the shared through/right lane. Widening the westbound 120th Street approach to provide a second exclusive right-turn lane would require a taking from the Los Angeles County Metropolitan Transportation Authority (Metro) park-and-ride lot serving Green Line station and would create a trap situation for non-HOV right-turning movements who inadvertently find themselves in the lane.</li> <li>Adding a second left-turn lane on the eastbound 120th Street approach would create an undesirable offset (i.e., lateral transition within the intersection) between the #1 westbound through lane and the eastbound left-turn lanes. Furthermore, the length of the new #1 eastbound left-turn lane would be severely limited due to an inability to widen 120th Street to the west due to the Dominguez Channel and water well on the north side and the Hawthorne Airport on the south side.</li> <li>Furthermore, providing a second left-turn lane on the eastbound 120<sup>th</sup> Street approach may require that either the existing HOV bypass lane on the on-ramp be converted to mixed-flow or the new #1 eastbound left-turn lane be restricted to HOV only. The former is not recommended because it would disincentivize creation of carpools. The latter is not recommended because it would create a trap situation for non-HOV left-turning vehicles who inadvertently find themselves in the lane.</li> </ul> <p>In addition to considering Caltrans' comments concerning this ramp, the City of Inglewood has engaged in informal consultations with the City of Hawthorne concerning this same location. During these consultations, the City of Hawthorne has requested that</p> |
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|                    | <ul style="list-style-type: none"> <li>WB I-105 off-ramp to Hawthorne Blvd</li> </ul> | <p>This proposal is infeasible.</p>  | <p>Mitigation was found to be infeasible for the following reasons:</p> <ul style="list-style-type: none"> <li>The westbound off-ramp approach is currently configured with a shared center lane, allowing it to be used flexibly.</li> <li>The south Hawthorne Boulevard leg is on the bridge adjacent to (and over) the Metro Green Line station and the I-105 freeway, with bus pullouts on both sides of the bridge serving the Green Line station. There is insufficient room to add lanes on the overpass without interfering with the existing bus stops.</li> <li>Given the cumulative nature of the impact, the Proposed Project could potentially contribute a fair share to improvements to increase the storage capacity on the southbound Hawthorne Boulevard approach (e.g., relocate the stop limit line approximately 50 feet to the south, restripe to provide a fourth southbound through lane, and relocate the traffic signal controlling the southbound approach due to relocation of the stop limit line). However, Caltrans does not have a defined project to implement these improvements.</li> </ul> <p>See Response to Comment Caltrans-9.</p> |
| <p>Caltrans-15</p> | <p>Provide multi-modal improvements and encourage active transportation.</p>          | <p>The project already provides multi-modal improvements to encourage active transportation.</p> | <p>The Project includes a series of improvements to enhance pedestrian safety, including a pedestrian bridge across Prairie Avenue, widening of the east crosswalk across West Century Boulevard at the South Prairie Avenue/West Century Boulevard intersection (Mitigation Measure 3.14-13 on page 3.14-248 of the Draft EIR), and provision of traffic control officers (TCOs) at numerous locations in the vicinity of the Project Site to manage the</p>   |

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|             |   |   | interaction of pedestrians and vehicles (part of the TMP required in Mitigation Measure 3.14-2(a) and further described in Draft EIR, Appendix K.4). See Response to Comment Caltrans-15.   |
| Caltrans-16 | Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds in order to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality.  | The proposal is noted. No mitigation is required. | Both Prairie Avenue and Century Boulevard are major arterials in the City of Inglewood circulation system and the City does not have plans to narrow either facility. However, as discussed in Response to Comment Caltrans-15, the Project includes a series of improvements to enhance pedestrian safety, including a pedestrian bridge across South Prairie Avenue, widening of the east crosswalk across West Century Boulevard at the South Prairie Avenue/West Century Boulevard intersection, and provision of TCOs at numerous locations in the vicinity of the Project Site to manage the interaction of pedestrians and vehicles. The Project also provides off-street bicycle parking exceeding City of Inglewood Municipal Code requirements and could accommodate a bike valet service in the West Parking Garage should demands materialize. See Response to Comment Caltrans-16. |
| Caltrans-17 | Prior to issuance of building or grading permits for the project site, the applicant shall prepare a Construction Transportation Management Plan for review and approval by City staff. Caltrans recommends that bicycle and pedestrian detours during construction meet or exceed standards required in the California | The project incorporates this proposal.           | Before issuance of grading permits for any phase of the Project, Mitigation Measure 3.14-15 requires preparation of a Construction Transportation Management Plan. This plan will address pedestrian and bicycle safety during construction. See Response to Comment Caltrans-17.   |

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|             | Manual on Uniform Devices.   |   |  |
| Caltrans-18 | Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. | The proposal is noted. No revision is required.   | The Project construction contractor will obtain the necessary permits for the transportation of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways. One of the items to be considered in the Construction Transportation Management Plan required in Mitigation Measure 3.14-15 is the time of day of arrival and departure of trucks.  |
| Channel-22  | The comment questions the feasibility and efficacy of installing permanent noise barriers to reduce noise from the Plaza.  | The Project incorporates adequate mitigation measures to address this impact.                 | Mitigation Measure 3.11-2(a) is designed to lower the sound from the Plaza sources, and specifically requires an enclosure around the rooftop restaurant be constructed. The noise-sensitive receptors to the northeast are shielded from Plaza noise because “[t]he back of the stage would be completely enclosed with a sound shell extending up to 30 feet in height.” (Draft EIR, p. 3.11-71.) The measure incorporates a performance standard that must be achieved. See Responses to Comments Channel-19 and Channel-22.  |
|             | The comment states that the analysis does not account for restaurant and crowd noise as the primary contributors to noise impacts to the northeast.  | The analysis has been supplemented, and mitigation has been revised, to address this concern. | Because sound from the mechanical equipment would occur concurrently with other sources in the Plaza area and sound levels at receptors are the result of multiple sources of sound, the Draft EIR appropriately evaluates impacts at a composite level.<br><br>In addition, Mitigation Measure 3.11-2(a) has been revised to require that the project applicant must “[d]esign and install noise generating mechanical equipment, such as emergency generators, transformers, and/or HVAC units so that such equipment will not cause exceedance of the ambient conditions by more than 3 dBA at any noise sensitive receptor by means of |



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|  |  |  | acoustical enclosures, silencers, barriers, relocation, and/or other noise-reducing approaches.”<br>See Response to Comment Channel-22.  |
|  | Timing of preparation of Noise Reduction Plan. | The mitigation measure focusing on this impact has been revised to address this concern. | Mitigation Measure 3.11-2(a) has been revised to clarify the intent and efficacy of the Operations Noise Reduction Plan. As revised, Mitigation Measure 3.11-2(a) requires that the Operations Noise Reduction Plan would be developed and approved prior to issuance of the first building permit for the Plaza buildings and verified prior to issuance of a Certificate of Occupancy for the Plaza buildings, and would be in effect for the duration of operations. See Response to Comment Channel-22; see also MMRP, Mitigation Measure 3.11-2(a). |

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|  | <p>Timing of preparation of design for outdoor stage to limit noise levels.</p>                              | <p>The mitigation measure focusing on this impact has been revised to address this concern.</p>                | <p>The outdoor stage would not result in “a clear line-of-sight to noise sensitive uses to the north east.” Based on the preliminary design for the outdoor stage in the Plaza area, the back of the outdoor stage, which would be located on the east side of the stage, would be completely enclosed with a sound shell extending up to 30 feet in height and the speakers would be oriented inward toward the west/southwest where the majority of the audience would be and not to the northeast where the alleged tunnel is located. Mitigation Measure 3.11-2(a) lists a range of feasible noise control features that can be implemented to reduce noise from the stage to ensure that noise levels remain below applicable standards. The also requires that the Operations Noise Reduction Plan be developed and approved prior to issuance of the first building permit for the Plaza buildings and verified prior to issuance of a Certificate of Occupancy for the Plaza buildings, and would be in effect for the duration of operations. See Responses to Comments Channel-22 and Channel-24; see also MMRP, Mitigation Measure 3.11-2(a).</p> |
|  | <p>The use of sound-absorbing materials on Plaza buildings will be ineffective.</p>                          | <p>The use of sound-absorbing materials as one potential means of addressing noise impacts is appropriate.</p> | <p>Refinements to Mitigation 3.11-2(a) would require the project applicant to “[u]tilize sound-absorbing materials on the exterior of Plaza buildings to reduce potential tunneling effect from onsite buildings to adjacent to off-site sensitive receivers.”</p>   |
|  | <p>Insufficient evidence to support the proposal to enclose the rooftop restaurant with a noise barrier.</p> | <p>The mitigation measure focusing on this impact has been revised to address this concern.</p>                | <p>The requirements for the Operations Noise Reduction Plan have been refined to include a specification that the rooftop restaurant would include an enclosure that would be constructed with a material, such as glass, having a minimum density of 3.5 lbs/sf along the north/northeast perimeter of the rooftop restaurant, would be a minimum of 60 inches high, and would have no gaps</p>   |

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|                   |   |   | <p>between each panel or between the panel or between the panel floor, and as allowed by building code, and that such an enclosure would provide a minimum of 8 dBA sound insertion loss. See Responses to Comments Channel-22 and Channel-24.</p>   |
| <p>Channel-24</p> | <p>The EIR must impose a mitigation measure requiring enclosure of the rooftop restaurants and define maximum volumes for amplified music and stage activities.</p> | <p>The mitigation measure focusing on this impact has been revised to address this concern.</p> | <p>Mitigation Measure 3.11-2(a) has been revised to require implementation of mandatory noise reduction measures including, in relevant part, the following:</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p>Mitigation Measure 3.11-2(a) has been further revised to identify additional noise reduction measures that will be considered in the design of the Plaza to demonstrate that noise levels from amplified sound equipment would result in sound levels of no more than 3 dBA over ambient conditions at any noise-sensitive receptor. This includes, in relevant part, the following:</p> <ul style="list-style-type: none"> <li>• 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:</li> </ul> |

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|            |  |                               | <ul style="list-style-type: none"> <li>&gt; Design the outdoor stage and sound amplification system (placement, directivity, orientation, number of speakers, and/or maximum volume) so as to limit noise levels near noise-sensitive receptors.</li> <li>&gt; Utilize sound-absorbing materials on the exterior of Plaza structures where appropriate and effective to reduce noise levels at adjacent off-site sensitive receptors.</li> </ul> <p>See Responses to Comments Channel-20, Channel-21, Channel-22 and Channel-24.</p>                |
| Channel-26 | The Project must incorporate a mitigation measure prohibiting ticketed events at the Project on the same day as events at the Forum and NFL Stadium—where combined attendance exceeds, for example, 24,500 people. | This proposal is infeasible.  | This proposal is infeasible and impractical for a number of reasons. These reasons are set forth in Response to Comment Channel-26, and in a memorandum prepared by David Stone, a consultant retained by the City to analyze the feasibility of this proposal. Memorandum from David Stone, Stone Planning, to Mindy Wilcox, City of Inglewood. Re: IBEC and Proposed Attendance Restriction, May 21, 2020. This proposal would also have limited effectiveness in avoiding the Project’s significant impacts. See Response to Comment Channel-26. |
| Channel-34 | Impose mitigation measures to widen sidewalks—maintain a 20-foot wide public sidewalk to avoid significant pedestrian impacts on the east side of Prairie Avenue.  | This proposal is unwarranted. | Widening the sidewalk on the east side of South Prairie Avenue beyond eight feet is not necessary in order to provide adequate and safe pedestrian capacity. If it conservatively assumed that 50 percent of all attendees were to walk from the arena via this portion of the sidewalk, the resulting volume would be only 1,725 pedestrians—which corresponds to LOS B pedestrian space condition, which is considered acceptable. See Responses to Comments Channel-30 through Channel-34.   |

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| Channel-36         | The Project must mitigate significant cumulative transit impacts by making fair-share contributions to Metro in order to provide additional transit services.  | This proposal is unwarranted.                                       | The Project’s impacts on transit are not significant. For this reason, the mitigation measure proposed in the comment is not required. See Responses to Comments Metro-2, Channel-35 and Channel-36. In addition, the Event TMP acknowledges the potential for events at the NFL Stadium, The Forum and/or the Project arena to occur at the same time, and provides for adapting to transit demand as it arises.  |
| LADOT-3            | A cooperative mitigation program should be considered for IBEC and the Hollywood Park Specific Plan project (HPSP).  | The Event Transportation Management Plan requires such cooperation. | The City agrees that there is a need for coordination between the HPSP project, particularly stadium events, and the Proposed Project as the mitigation program is finalized and implemented. The Draft Event TMP, included in the Draft EIR as Appendix K.4, provides for such coordination. Page 41 of the Draft Event TMP states that “[t]he City of Inglewood should convene recurring as-needed meetings of the IBEC, Forum, and NFL Stadium operators to coordinate traffic management activities for overlapping or concurrent events at the three venues and shall ensure that such coordination occurs.” As stated on page 1 of the Draft Event TMP, it is intended to be adaptable and updated based on, among other things, “[c]oordination with the operators of the NFL Stadium TMOP and The Forum.” See Response to Comment LADOT-3. |
| LADOT-5<br>LADOT-9 | For MM 3.14-1(a), Event Transportation Management Plan – include language that requires communication with LADOT Special Traffic Operations staff to ensure that appropriate measures are considered to address potential event related queuing conditions on street traffic managed by LADOT. | The Event TMP has been revised as requested by the comment.         | The Draft EIR, Appendix K.4, Table 1 is revised to add the following to the bottom of the table:<br><br><i>LADOT manages and maintains streets and other local roads in the City of Los Angeles.</i><br><br><i>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)</i>   |

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|         |   |   | <p><i>staff.</i></p> <p>The Event TMP provides a mechanism for establishing cost-sharing agreements in the event monitoring shows a regular and recurring need to deploy TCOs or other traffic control measures on key corridors in the City of Los Angeles. See Responses to Comments LADOT-5 and LADOT-9.</p>   |
| LADOT-6 | <p>For MM 3.14-2(c), West Century Blvd/La Cienega Blvd Physical Improvement – include language that requires the project to, should the proposed mitigation be deemed infeasible, provide a commensurate substitute mitigation.</p> | <p>The mitigation measure has been revised as requested by the comment.</p> | <p>Mitigation Measure 3.14-2(c) has been revised to add the following language:</p> <p><i>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.</i></p> <p>See Response to Comment LADOT-6.</p>  |
| LADOT-7 | <p>For MM 3.14-3(j), Centinela Ave/La Cienega Blvd Physical Improvement – include language that requires the project to provide a commensurate substitute mitigation should the proposed mitigation be deemed infeasible.</p>       | <p>The mitigation measure has been revised as requested by the comment.</p> | <p>Mitigation Measure 3.14-3(j) has been revised to add the following language:</p> <p>Mitigation Measure 3.14 3(j)</p> <p><i>... 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.</i></p> <p>See Response to Comment LADOT-7.</p> |

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| Garcia-1 | Consider providing gondola rides to the Arena and nearby sports / entertainment venues. | This proposal is infeasible. | The proposal to construct and operate a gondola system providing access to the Arena and nearby sports / entertainment venues is considered infeasible due to its cost, the availability of more effective public transit options, and lack of control over HPSP land that would be required to implement such an improvement. See Response to Comment Garcia-1. |
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| <p>LADOT-10</p> <p>17077.001 4847-6266-0032.1<br/>DRAFT (June 12, 2020)<br/>Page [ PAGE ] of [ NUMPAGES ]</p> | <p>Since the DEIR discloses that several City of Los Angeles' study intersections cannot be directly mitigated, LADOT would like the Project mitigation program to include a commensurate ITS package, to be determined in consultation with appropriate LADOT staff, that can be used to address these impacts.</p> | <p>A mitigation measure has been developed in consultation with LADOT; such mitigation is incorporated into the Project.</p> | <p>Based on further consultations with LADOT to address this comment, the following additional Mitigation Measure 3.14-18(s) has been developed and applied to the Project:</p> <p><i>Mitigation Measure 3.14-18(s)</i></p> <p><i>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.</i></p> <p><i>Concourse Way / West Century Boulevard</i></p> <p><i>Western Avenue / West Century Boulevard</i></p> <p><i>Vermont Avenue / West Century Boulevard</i></p> <p><i>Van Ness Avenue / Manchester Boulevard</i></p> <p><i>Western Avenue / Manchester Boulevard</i></p> <p><i>Normandie Avenue / Manchester Boulevard</i></p> <p><i>Vermont Avenue / Manchester Boulevard</i></p> <p><i>Hoover Avenue / Manchester Boulevard</i></p> <p><i>Figueroa Street / Manchester Boulevard</i></p> <p><i>I-110 Southbound On/Off-Ramps /</i></p> |
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|          |   |   | <p><i>Manchester Boulevard</i></p> <p><i>I-110 Northbound On/Off-Ramps / Manchester Boulevard</i></p> <p><i>Crenshaw Boulevard / Florence Avenue</i></p> <p>See Response to Comment LADOT-10.</p>  |
| Metro-12 | <p>The temporary relocation of the existing East Century/Prairie bus stop during construction potentially creates a safety hazard and could adversely affect public transit operations. Metro requests that the bus stop instead temporarily be relocated further west to approximately 60 feet west of the Starbucks driveway. Construction of parking facilities on the parcel west of the Starbucks driveway may cause the temporary stop to be relocated from time to time, and we encourage ongoing communication with Metro prior to and throughout the construction process.</p> | <p>This proposal is noted and will be considered by the City during construction. The proposal is not required in order to avoid a significant impact of the Project.</p> | <p>Metro’s request to situate the temporary bus stop on West Century Boulevard at a location 60 feet west of the Starbucks driveway (instead of directly west of South Prairie Avenue) has been forwarded to the City for its consideration. The City and the project applicant would coordinate with Metro to identify a mutually acceptable temporary bus stop. Such coordination will occur as construction proceeds. See Response to Comment Metro-12.</p> |
| Metro-13 | <p>Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be ADA-compliant.</p>   | <p>This proposal is noted. Any modifications to bus stops will comply with applicable standards, including ADA requirements.</p>  | <p>This comment is advisory in nature, to inform the City of Inglewood and operator of the Project that bus stops (either temporary or permanent) must be designed in accordance with ADA standards. See Response to Comment Metro-13.</p>   |
| Metro-14 | <p>Metro recommends that the following information be included in the Project’s Construction Traffic Management Plan:</p> <p>“The Applicant shall coordinate with Metro Bus</p>   | <p>Mitigation incorporated into the project has been revised to include this proposal.</p>  | <p>Mitigation Measure 3.14-15(g) has been revised to include the following footnote</p> <p><i>The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro’s Stops and</i></p>  |

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|          | 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.” |  | <i>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.</i><br><br>See Response to Comment Metro-15.   |
| Metro-16 | Consider providing long-term funding for expanded transit.   | The proposal does not address an impact that would otherwise be significant. The proposal has been forwarded for the City’s consideration.                         | The request for long-term funding for additional rail service and personnel is noted and has been forwarded to the City and the project applicant for their information and consideration. See Response to Comment Metro-16.  |
| Metro-19 | Shuttle service hours and augmenting staff pre- and post-event should be extended on days with concurrent events at the Forum or SoFi Stadium to assist with excessive pedestrian and vehicle traffic.   | The comment is noted. Shuttle service capacity will be sufficient to meet demand. No revisions are required.   | On days with concurrent events, the type of shuttle bus operation could vary depending on whether parking is available in Hollywood Park or occupied by an event at the NFL Stadium. Depending on site-specific conditions such as event start/end times, shuttle service hours, routes, and staffing needs could change. The shuttle service would have ample capacity to accommodate transit riders without causing undue delays. See Response to Comment Metro-19.                   |
| Metro-20 | Adequate curb space and/or bus berths should be allocated and designated for shuttle bus stops at each of the rail stations to be serviced.  | The comment is noted. Curb space or berths will be determined in coordination with Metro as the Event TMP is developed and implemented. No revisions are required. | There is sufficient curb space at the Project site to accommodate shuttles. Curb space at Metro stations also appears to be sufficient. The designation of specific areas at Metro stations will be determined as the Event TMP is refined and implemented, in coordination with Metro. See Response to Comment Metro-20. In working out these details, Metro and the City will have the benefit of several years of experience with shuttles traveling between Metro stations and SoFi |

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| Metro-21 | <p>Pre- and post-event planning may or may not require street closures and/or queuing of event attendees on the sidewalk (i.e., public right-of-way) to uniformly control crowds. The City and Applicant should coordinate with transportation and public works staff of local jurisdictions where the shuttle services are anticipated to connect to Metro rail stations within and outside the City of Inglewood.</p> <p>Additional traffic officers and law enforcement support should be provided by the Applicant at transfer locations between rail and the shuttle service (at street level, not Metro property) to mitigate pedestrian and vehicle conflicts at intersections and sidewalks on the day of the event.</p> <p>A robust and comprehensive master sign program and wayfinding signs (well-lit for nighttime events) should be implemented to direct attendees to the bus shuttles to and from the arena and at all shuttle stops.</p> <p>The Applicant should consider allowing Metro TAP/Revenue staff to sell Metro fare media (one way, roundtrip, and day passes)</p> | <p>The comment is noted. The Event TMP provides for consideration of these proposals. No revisions are required.</p> | <p>The Event TMP requires coordination with Metro. The project applicant and the City are therefore required to work with Metro concerning the operational aspects of the Event TMP noted in the comment. It is anticipated that, if required, staff will be placed at transfer locations between rail and shuttles. Curb space allocation, wayfinding, promotion of use of transit and subsidy of transit passes are included in the TDM strategies described in Mitigation Measure 3.14-2(b) to achieve the required targets of transit use. See Response to Comment Metro-21.</p> |

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|               | <p>to attendees inside the arena or on the property to help alleviate overcrowding at rail station ticket vending machines after events.</p>   |   |  |
| <p>NRDC-9</p> | <p>The Project should require that shuttle buses should be ZE vehicles, starting on Day 1. ZE buses are available today from a number of vendors, including BYD in Los Angeles County.</p> | <p>These proposals are infeasible. Mitigation has been revised, however, to require ZE buses in the event they become commercially available.</p> | <p>The comment suggests that shuttle buses should be zero-emission (ZE) vehicles starting on day one. The project applicant would implement the Project shuttle and charter bus program by contracting with a third-party commercial operator. Although ZE shuttle buses exist today, deployment among commercial operators of ZE shuttles is limited. Because of the operational requirements for the shuttle program (45 persons per shuttle), the current limited supply of ZE shuttles and necessary infrastructure to support operations, and the limited available incentives to support the purchase of ZE shuttles by local commercial operators, it is currently uncertain as to whether ZE shuttles would be commercially available to be deployed when the required shuttle services to the Proposed Project would be initiated. To</p> |

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|        |   |                                 | <p>assess the feasibility of deployment of ZE shuttle buses, the City retained an air pollution reduction technology expert, Ray Gorski, to conduct a detailed evaluation of the potential availability of ZE and NZE technology as part of the construction and operation of the Project. Based on the input from the City’s expert, the feasibility of requiring ZE shuttle buses on day one with the inventory that is commercially deployed is uncertain.</p> <p>Based on the comment’s proposal, the following measure is considered feasible and has been incorporated into Mitigation Measure 3.2-2 as an additional requirement:</p> <p><b>Mitigation Measure 3.2-2(e)</b></p> <p><i>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.</i></p> <p>See Response to Comment NRDC-9; Ray Gorski, Inglewood Basketball &amp; Entertainment Center Draft EIR: Review of Suggested Mitigation Measures, May 2020.</p> |
| NRDC-9 | The Project should require that emergency generators be electrically powered, and the Project should install more solar panels, and storage for solar power, to power them. | These proposals are infeasible. | Emergency generators are designed to provide emergency power to life safety systems such as elevators and fire pumps in the event of a power outage. Electric generators are not feasible for use in emergency situations because in an emergency, electric power may not be available. See Response to Comment NRDC-9.   |
| NRDC-9 | Aspirational mitigation measures and “incentives” to reduce emissions of NOx should be replaced with mandatory measures. This   | These proposals are infeasible. | Based on an investigation of the availability of ZE and NZE trucks, the City concludes that such trucks are available but with limited applicability to construction-related activities.  |

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|  | <p>comment refers to MMs 3.2-1(d), 3.2-2(c), 3.2(c)(3), 4.3-1(d). There is no showing in the DEIR that making MMs 3.2(c)(3) and 4.3-1(d) is infeasible.</p> | <p>Performance requirements of heavy-duty on-road trucks for the construction activities required for the Proposed Project (i.e., soil import/export) are typically Class 8 trucks with a Gross Vehicle Weight Rating (GVWR) greater than 33,000 pounds, equipped with engines greater than 10 liters. Currently ZE and NZE trucks available consist of engines with displacement of 6.8- and 8.9-liters are not powerful enough to provide the main service needed during construction (hauling) and therefore would not represent a meaningful portion of the on-road truck trips analyzed in the draft EIR. Because ZE and NZE equipment costs considerably more than similar diesel-powered equipment, most purchasers rely on one of several incentive programs offered by the California Air Resources Board (CARB), California Energy Commission (CEC), or programs administered by the SCAQMD to offset the cost. Based on a search of all major California programs that offer incentives for this type of engine, none were used for construction-related activities such as haul trucks. Because of the uncertainty of the availability of on-road trucks appropriate for construction duty in the market in the timeframe anticipated for project construction, an unequivocal requirement to use ZE or NZE technology that is not yet commercially available would be too speculative to be considered feasible at this time.</p> <p>Mitigation Measure 3.2-2(d) requires the project applicant to incentivize the use of ZE or NZE heavy-duty trucks for vendors and material deliveries during operation of the Proposed Project. Requiring NZE trucks during operations, as requested by the SCAQMD, would be infeasible as trucks visiting the Project Site would primarily be from third party vendors or tenants, which may be selected based on specific, possibly competing, criteria</p> |
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|        |   |   | <p>than their access to ZE or NZE delivery trucks. For example, in order to ensure that the City achieves its goal of additional employment opportunities for Inglewood residents and businesses, the proposed Development Agreement requires the developer, as the owner of the Arena, to take various actions to achieve the goal of hiring qualified Inglewood residents for no less than 35% of the employment positions needed in connection with event operations at the Arena; these employment positions include the Developer's contractors, subcontractors, and vendors providing services in connection with events held inside the Arena, such as food and beverage service, hospitality, and event security ("Event Operations Providers").</p> <p>Local small businesses may not have the ability to secure ZE heavy-duty trucks to which larger vendors may have access. According to the City's air pollution reduction technology expert, as of today there is there is limited availability of NZE and ZE vehicles in commercial businesses, and specifically in businesses that support the commercial activities that would likely be needed at an event center like the Project. Additionally, it is not currently knowable which vendors or tenants would be present during initial operations, and they may change over time. For these reasons, it is speculative to assume that it would be feasible to require vendors and suppliers to provide deliveries and services exclusively, or even meaningfully, using NZE and ZE. As such Mitigation Measure 3.2-2(d) includes all feasible mitigation. See Responses to Comments SCAQMD3-14 and NRDC-9.</p> |
| NRDC-9 | Electric vehicle parking for the Project must be provided | This proposal is already required as an element of the Project. | These items are already included in the Project. (See Draft EIR, p. 2-64.) A total of 330 electric vehicle charging stations would be installed at the Project Site—equal to 8 percent of total parking   |

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|        |   |  | spaces available. See Response to Comment NRDC-9. The Project must also provide electric vehicle charging stations to the community as required under AB 987.  |
| NRDC-9 | Each building should include photovoltaic solar panels  | This proposal is already required as an element of the Project.  | The Project will build and operate a solar and battery system. The Project would install PV panels on the Arena, the South Parking Garage, and the West Parking Garage. Because solar power generated on private property cannot be transferred across a public right of way, such as streets, PV panels were not anticipated on the East Parking Structure since the energy demand from the parking structure and transportation hub is low. The hotel transaction and design have not progressed to the point where feasibility and efficacy of PV panels on the hotel structure or elsewhere on the hotel site can be determined. A requirement for the inclusion of PV panels would be stipulated in the final conditions of approval for the hotel, if determined appropriate and feasible, when the hotel design is finalized. See Response to Comment NRDC-9. |
| NRDC-9 | The TDM program must be revised to quantify the criteria pollutant and GHG reductions expected from the TDM measures. | This proposal is unwarranted. Mitigation Measure 3.7-1(a) already requires the applicant to quantify and offset fully the project's GHG emissions. | The magnitude of potential emissions reductions is based on vehicle miles traveled, which considers mode, ridership, and trip lengths for events, employees, and patrons of the Project. The efficacy of these measures cannot be quantified at this time and calculating the reduction in air pollutants and GHGs would be too speculative. Nevertheless, the efficacy of the TDM program in resulting GHG emissions reductions will be monitored and quantified as part of the GHG Annual Verification Report required by Mitigation Measure 3.7-1(b). The measure identifies a specific performance standard – no net new GHG emissions – that must be achieved. See Response to Comment NRDC-9, MMRP Mitigation Measure  |



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|        |  |   | 3.7-1(a) [GHG Reduction Plan].  |
| NRDC-9 | The GHG reduction plan must be revised so as not to defer development of mitigation measures, and to quantify the measures selected. The process for verifying the actual number and attendance of net new, market-shifted, and backfill events is unacceptably vague and the verification process may itself be subject to CEQA as a discretionary project.   | This proposal is unwarranted. Mitigation Measure 3.7-1(a) already requires the applicant to quantify and offset fully the project's GHG emissions.  | The EIR does not improperly defer mitigation. Mitigation Measure 3.7-1(a) provides a list of required measures to be included in the GHG Reduction Plan and identifies potential additional measures that may be needed to achieve no net new GHG emissions. Achievement of no net new GHG emissions is a measurable performance standard that would be monitored and verified by an independent qualified expert on an annual basis, as described in Mitigation Measure 3.7-1(b). The measure provides a menu of measures that may be used to achieve this identified standard.  |
| NRDC-9 | <p>Purchase and use of GHG offsets must meet CARB standards for cap and trade offsets. Having a CARB-approved registry is not the same thing as requiring CARB-approved offset credits, which are limited in scope and strictly regulated. Additional local, direct measures that should be required before offsets are used include the following:</p> <ol style="list-style-type: none"> <li>1. Urban tree planting throughout Inglewood</li> <li>2. Mass transit extensions</li> <li>3. Subsidies for weatherization of homes throughout Inglewood</li> <li>4. Incentives for carpooling throughout Inglewood</li> <li>5. Incentives for purchase by the public of low emission vehicles</li> </ol> | This proposal is unwarranted. Mitigation Measure 3.7-1(a) already requires the applicant to quantify and offset fully the project's GHG emissions. The measure allows for the use of both offset credits and local reduction measures, both of which are effective in offsetting GHG emissions. | <p>CARB has adopted five Compliance Offset Protocols to date that qualify for use in the State of California's Cap and Trade program and has approved three Offset Project Registries to help administer the Compliance Offset program. The EIR specifies the use of a CARB-approved registry to ensure that any offsets used for mitigating the Project GHG emissions would be of the highest quality—i.e., real, additional permanent, and third-party verified.</p> <p>AB 987 requires the use of local, direct measures to mitigate at least 50 percent of the reductions needed to achieve “no net new” project emissions because the environmental effects of GHG emissions are purely cumulative in nature and involve global climate change that cannot be tied to emissions in any one location or mitigated exclusively at a local level, no such requirement exists for compliance with CEQA's requirements for mitigation.</p> <p>See Response to Comment NRDC-9.</p> |

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|                            | <ul style="list-style-type: none"> <li>6. Free or subsidized parking for electric vehicles throughout Inglewood</li> <li>7. Solar and wind power additions to Project and public buildings, with subsidies for additions to private buildings throughout Inglewood</li> <li>8. Subsidies for home and businesses for conversion from gas to electric throughout Inglewood</li> <li>9. Replacement of gas water heaters in homes throughout Inglewood</li> <li>10. Creation of affordable housing units throughout Inglewood</li> <li>11. Promotion of anti-displacement measures throughout Inglewood</li> </ul> |   |   |
| <p>NRDC-10<br/>NRDC-11</p> | <p>The Project must mitigate impacts resulting from displacement.</p>  | <p>Mitigation for displacement impacts is not required.</p> | <p>The City conducted a thorough study of potential direct and indirect housing displacement and there is no evidence in the record to support a conclusion that a new sports venue would indirectly contribute to effects that would result in displacement of existing housing units or residents in such substantial numbers that the construction of new housing elsewhere would be necessary. See Responses to Comments NRDC-4, NRDC-10 and NRDC-11.</p> |
| <p>West Basin-2</p>        | <p>West Basin respectfully requests that a small area (approximately 1,000</p>   | <p>This proposal is not required.</p>                       | <p>The City remains committed as part of its current and continuing discussions with the West Basin Municipal Water</p>   |

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|  | square feet) of the Proposed Project property be designated for a future recycled water disinfection station. |  | District to assist it with finding an acceptable alternative site. The project will not affect the ability of the City and the District to identify such a site. See Response to Comment West Basin-2. |
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## **Section VI. Evaluation of Project Alternatives**

The EIR identified and analyzed in detail seven alternatives to the Proposed Project. These alternatives were selected for detailed analysis because, among other things, they were identified as “potentially feasible.” (CEQA Guidelines, § 15126.6, subd. (a).) Alternatives that are identified as not “potentially feasible” may be eliminated from detailed analysis in the EIR.<sup>7</sup>

The City Council now adopts findings concerning the feasibility of these alternatives. In adopting these findings, the City Council has considered the Project alternatives presented and analyzed in the EIR and presented during the comment period and public hearing process. The City Council finds, based on specific economic, legal, social, technological, or other considerations, that these alternatives are infeasible. Based on the impacts identified in the EIR and other reasons summarized below, and as supported by substantial evidence in the record, the City Council finds that approval and implementation of the Project as proposed is the most desirable, feasible, and appropriate action and hereby rejects the other alternatives and other combinations and/or variations of alternatives as infeasible based on consideration of the relevant factors set forth in CEQA Guidelines section 15126.6, subdivision (f). (See also CEQA Guidelines section 15091, subd. (a)(3).)

The City Council wishes to draw a distinction between whether an alternative is “potentially feasible,” and whether an alternative is found to be “feasible.” In particular, the concept of “feasibility” is not the same as the identification of “potentially feasible” alternatives selected for detailed analysis in the Draft EIR.

At the time the Draft EIR is prepared, the lead agency identifies alternatives that are “potentially feasible.” (CEQA Guidelines, § 15126.6, subd. (a).) At the project approval stage, by contrast, agency decision-makers must weigh the relative advantages and disadvantages of alternatives analyzed in the EIR. As a result of this process, the decision-makers must determine whether to approve the proposed project, to approve an alternative to the project, or to disapprove the project. A decision to reject alternatives in favor of the proposed project may be characterized as a finding that the alternatives are infeasible. (CEQA Guidelines, § 15091.)

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<sup>7</sup> Such alternatives that were considered but dismissed from further evaluation in the Draft EIR are described in section 6.3 of the Draft EIR, pages 6-12 through 6-18, and include use of the Project Site for an entertainment venue, a substantially reduced arena, housing, or an employment center/business park, and also include alternative locations in the City of Inglewood and elsewhere in the region.

The distinction between these two points in the process is noteworthy. At the Draft EIR stage, the focus is on, among other things, whether the alternative is “potentially feasible.” At the project approval stage, the focus is on whether the alternative is actually feasible. A decision in one context is not the same as a decision in the other. For example, an EIR may identify an alternative as “potentially feasible,” and therefore worthy of detailed analysis. Such an identification does not mean, however, that the agency decision-makers must find that this alternative is actually feasible. That is a separate determination that may or may not reach the same conclusions as put forth in the EIR. Moreover, the agency’s finding concerning the actual feasibility or infeasibility of an alternative may consider information in the EIR or elsewhere in the record; the information that the decision-makers may consider is not restricted to the EIR.

Finally, an agency’s finding rejecting an alternative as infeasible does not imply that this alternative was improperly included for detailed analysis in the EIR. Rather, as explained above, the alternatives included in an EIR as potentially feasible, and those rejected as infeasible by decision-makers, represent two distinct points in the CEQA process, using different standards, and based on evidence that may or may not be the same.

In light of these principles, the following discussion addresses whether the alternatives analyzed in detail in the EIR are, in fact, feasible. The discussion draws largely from the EIR, but it also relies on additional evidence elsewhere in the City’s record. The aim is to provide City decision-makers with information that may be useful in adopting CEQA findings concerning the alternatives analyzed in the EIR.

These findings rely in part on an analysis of the feasibility of alternatives prepared by ESA, the City’s lead environmental consultant for the project.<sup>8</sup> This memorandum, cited as the “ESA Alternatives Memo,” provides additional information concerning the extent to which the alternatives analyzed in the EIR are feasible or are consistent with the City’s objectives or the project applicant’s objectives for the Project.

## **A. Summary of Alternatives Considered**

CEQA mandates that an EIR evaluate a reasonable range of alternatives to the Project or the Project location that generally reduce or avoid potentially significant impacts of the Project. CEQA requires that every EIR also evaluate a “No Project” alternative. Alternatives provide a basis of comparison to the Project in terms of their significant impacts and their ability to meet project objectives. This comparative analysis is used to consider reasonable, potentially feasible options for minimizing environmental consequences of the Project. Here, the EIR identified and analyzed in detail seven alternatives to the Project. These alternatives were selected for detailed analysis because, among other things, they were identified as “potentially feasible.” (CEQA Guidelines, § 15126.6, subd. (a).) The seven alternatives to the Project analyzed in the EIR are the (1) No Project; (2) Reduced Project Size; (3) City Services Center Alternative Site; (4) Baldwin hills Alternative Site; (5) The District at South Bay Alternative Site; (6)

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<sup>8</sup> Memorandum from Brian D. Boxer, AICP, ESA to Mindy Wilcox Re: Feasibility of IBEC Alternatives (June 12, 2020) (cited as the “ESA Alternatives Memo”).

Hollywood Park Specific Plan Alternative Site; and (7) The Forum Alternative Site.

The City Council rejects the Alternatives set forth in the EIR and summarized below because the City Council finds that there is substantial evidence, including evidence of economic, legal, social, technological, and other considerations described in this Section in addition to those described in Section F below under CEQA Guidelines section 15091(a)(3), that make infeasible such Alternatives. In making these determinations, the City Council is aware that CEQA defines “feasibility” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors.” The Council is also aware that under CEQA case law the concept of “feasibility” encompasses (i) the question of whether a particular alternative promotes the underlying goals and objectives of a project, and (ii) the question of whether an alternative is “desirable” from a policy standpoint to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

## **1. Alternative 1: No Project**

### **Description**

Under CEQA, the No Project Alternative must consider the effects of not approving the project under consideration. The No Project Alternative describes the environmental conditions that exist at the time that the environmental analysis commences, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved (CEQA Guidelines section 15126.6(e)(2)). In the case of the Project, the Project Site is partially developed, so continuation of existing conditions would involve continued operation of businesses and re-tenanting of current developed land uses on the Project Site. Existing conditions are described in the Environmental Settings of each section within Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, of this Draft EIR.

Under the No Project Alternative, the City Council would not approve any project on the Project Site, and none of the mitigation measures identified within this Draft EIR would be implemented. No demolition would occur under the No Project Alternative, because the existing structures on the site would be retained. The vacant parcels on the Project Site would continue to be vacant. The developed parcels on the Project Site would continue to be used, existing uses would continue, and those buildings that are currently vacant would be re-tenanting.

CEQA Guidelines section 15126.6(e)(3)(B) states that “[i]f disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed.” In this case, the Project Site is partially located within the IIBP Specific Plan, which calls for the development of light industrial and general commercial uses. The City adopted the IIBP Specific Plan in 1993. During the intervening 26 years, the development envisioned in the IIBP has not occurred. The parcels on the Project Site have remained vacant in part for the following reasons: (1) the recessions during the 1990s and 2000s, including the “Great Recession” of 2007-2012 hindered development; and (2) projects that have been proposed on the Project Site ended up not being economically feasible and failed to proceed to construction. (ESA Alternatives Memorandum, pp. 2-3.)

In light of the lack of development activity within the IIBP Specific Plan area over nearly three decades, it is not foreseeable that “predictable actions by others” would lead to development of the vacant parcels for uses consistent with the IIBP Specific Plan. Because these parcels have remained vacant for such a long time, and the City has not received any development applications for the vacant parcels, it is a reasonable assumption that no development of currently vacant parcels on the Project Site would occur within the foreseeable future. Although the IIBP would remain in place, development as contemplated by the IIBP would not occur.

One potential use of the Project Site in the absence of the Project would be for off-site parking spaces to accommodate parking demands during large events at the NFL Stadium located within the Hollywood Park Specific Plan. (ESA Alternatives Memo, p. 3.) The NFL Stadium was approved by initiative in 2015. At that time, transportation and parking studies were performed to analyze how stadium patrons would travel to and from the Stadium site. These studies identified the Project Site as a likely location to provide parking for the Stadium on game days. The studies concluded that the Project Site could provide approximately 3,600 parking spaces. (*Ibid.*) This parking would only be needed, however, on an intermittent basis (likely 20 to 40 times per year). For the vast majority of the year, the Project Site would likely remain largely vacant and underutilized.

Under the No Project Alternative, it is assumed that for the foreseeable future the LA Clippers would continue playing at the Staples Center in Downtown Los Angeles, and the LA Clippers’ team offices would continue to be located on Flower Street, within two blocks of Staples Center. In addition, the LA Clippers would continue to use its practice and training facility in the Playa Vista neighborhood within Los Angeles. It is also reasonable to assume that the LA Clippers would either remain at Staples Center or seek an alternate location for the development of a new arena. While there is currently no identified alternate location under consideration, the discussion under Section 6.3.6 provides a description of the evaluation process previously undertaken by the LA Clippers, and the discussion under Alternatives 3 through 7 provides a description of the comparative environmental effects of development of the Project at five alternative locations in the region, including three other sites in the City of Inglewood.

### **Relationship to Project Objectives**

Under the No Project Alternative none of the City’s or applicant’s objectives for the Project would be achieved. Specifically, none of the City’s or applicant’s objectives to enhance the community would be accomplished. For example, the City would not achieve its goals of promoting the City as a premier regional sports and entertainment center (City Objective 1), enhancing the City’s general economic health by stimulating new business and economic activity (City Objective 2), and constructing (with private funds) a public assembly space to host sporting, cultural, business, and community events (City Objective 8). Similarly, the applicant would be unable to achieve its goals of creating a lively, visitor- and community-serving environment year-round for patrons, employees, community members, and visitors (Applicant Objective 1e) and contributing to the economic and social well-being of the surrounding community by providing public benefits and increasing revenues (Applicant Objective 1f).

In addition, FAA Airport Improvement Program Grant funds have been used to acquire most of the Project Site. This program contemplates that property acquired using these funds will be redeveloped for

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a use that is compatible with the property's proximity to LAX. The grant agreements also generally require that the City use its best efforts to "dispose of the land at fair market value at the earliest practicable time..." (See ESA Alternatives Memo, pp. 3-4.) This same principle applies to those parcels acquired by the City's Redevelopment Agency, and now owned by the Successor Agency. This requirement is embodied in the City's objectives for the Project, which include:

5. Transform vacant or underutilized land within the City in to compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City.

Under this Alternative, the Project Site would remain largely undeveloped, and would not be redeveloped for uses consistent with those contemplated under the FAA grant program. Holding the Project Site vacant and/or underutilized under the No Project Alternative would be inconsistent with the obligation to use best efforts to dispose of the Project Site parcels at a fair market value at the earliest practicable time, as specified in the grant agreements under the FAA AIP program. (See ESA Alternatives Memo, pp. 3-4.)

### **Comparative Impacts**

Table 6-2 at the end of Chapter 6.0, Alternatives, of the EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 1. Because no new development would occur at the Project Site, the effects of the No Project Alternative would be a continuation of the existing conditions described in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures. Because the Project would not be constructed or operated at the Project Site under this alternative, none of the impacts identified for the Project would occur under the No Project alternative.

The Arena Site contains two developed parcels that are currently unoccupied. One unoccupied building is a two-story warehouse/light manufacturing facility located on the north side of West 102nd Street. The other unoccupied building is a one- and two-story concrete commercial building with an access driveway and small parking area located at 3838 West 102nd Street. Under Alternative 1, it is foreseeable that these buildings would be leased to new tenants, and warehouse/light industrial/commercial activities in those buildings would resume. These activities would foreseeably be similar in nature and scope to those activities that have occurred in the past.

The effects of continued use of Staples Center for LA Clippers games would continue to create a range of environmental effects in and around downtown Los Angeles and the region, including the generation of vehicle miles traveled (VMT) and associated congestion during pre- and post-event hours, and generation of criteria air pollutants including ozone precursors and small particulate matter. Because these effects are ongoing, they are considered part of the regional environmental setting and would not be subject to mitigation through the CEQA process.

### **Basis for Finding**

While the No Project Alternative would avoid impacts associated with the Project, this alternative would not further any of the Project objectives or provide any of the benefits contemplated by the Project. As

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discussed above, under the No Project Alternative, the vacant parcels on the Project Site would likely remain vacant or underutilized for the foreseeable future and, as a result of the parcels remaining vacant, the City’s economic development goals for the Project Site and the City at large, as set forth in the City’s General Plan Land Use Element, would not be met. In addition, holding the Project Site vacant and/or underutilized under the No Project Alternative would be inconsistent with the City’s obligation to use best efforts to dispose of the Project Site parcels at a fair market value at the earliest practicable time, as specified in the grant agreements under the FAA program. The public benefits to be provided pursuant to the Development Agreement for the Proposed Project would also not be provided under the No Project Alternative. (See ESA Alternatives Memorandum, p. 5.) The City Council thus rejects the No Project Alternative on each of these grounds independently. All of the reasons provide sufficient independent grounds for rejecting this alternative.

**Finding**

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible this project alternative identified in the EIR.

**2. Alternative 2: Reduced Project Size**

**Description**

Under Alternative 2, the Project would be reduced in size to the maximum extent potentially feasible so as to avoid or substantially lessen impacts that would be associated with the intensity of development on the Project Site. Alternative 2 examines the impacts of a project that would still provide an arena sized consistent with the smallest recently-constructed NBA arenas, while eliminating all other uses that are not absolutely essential to the construction and operation of the arena itself. In this fashion, Alternative 2 would eliminate all uses other than the arena itself, the plaza that supports arena entry and exit, and the infrastructure (primarily parking) necessary to serve the arena. Further downsizing the arena is considered infeasible because an arena with further reduced capacity would be smaller than any other recently constructed arenas serving an NBA franchise.

An alternative that eliminates the arena, or includes an arena smaller than the minimum size required for an NBA franchise, would not meet a basic project objective. Alternative 2 would meet this basic project objective, while minimizing, to the extent feasible, impacts in the immediate vicinity of the Project Site. As such, under this alternative only the Arena, pedestrian plaza, and South Parking Garage would be constructed on the Arena Site. None of the other Project elements (i.e., team practice facility, sports medical clinic, and team administrative offices, retail shops and restaurants, outdoor plaza stage, hotel, and community-type uses) would be constructed. The LA Clippers’ team offices would continue to be located on Flower Street within two blocks of Staples Center, while the LA Clippers would continue to use their practice and training facility in the Playa Vista neighborhood of Los Angeles. It should be noted that the environmental impacts of operation of these facilities in their current locations are included in the existing conditions, and would continue into the future under Alternative 2.

- Comment [U5]:** Check ESA memo – anything to add?
- Comment [U6]:** Please add sponsor operational and urban design considerations discussion from the underlying memorandum here and in the Basis for Findings.
- Comment [U7]:** Suggested global check for consistency



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Under this alternative, the seating capacity of the arena would be reduced by approximately 3 percent to approximately 17,500 (up to 18,000 attendees in certain concert configurations), consistent with the seating capacity of the most recently built NBA arena (i.e., Fiserv Forum in Milwaukee, Wisconsin).<sup>9</sup> Without inclusion of team practice facility, sports medical clinic, and team offices, the arena structure would be further reduced in size. Furthermore, elimination of retail and community uses would mean that the pedestrian plaza would also be larger under this alternative as compared to the Project.

Parking provided under Alternative 2 would comply with parking supply requirements established in Inglewood Municipal Code section 12-47, which require provision of parking spaces at a ratio of 1 space per 5 attendees. With a total capacity of 18,000 attendees at the arena, this alternative would require a minimum of 3,600 parking spaces. Alternative 2 would provide 3,775 on-site parking spaces, slightly more than required by the Municipal Code, compared to the 4,125 on-site parking spaces provided by the Project. The West Parking Garage would be constructed with 3,110 spaces across six stories, the same as under the Project. In addition, the proposed South Prairie Avenue pedestrian bridge linking the West Parking Structure to the plaza on the Arena Site would still be included. Similar to the Project, the South Parking Garage would be located immediately to the south of the arena on the Arena Site, providing 625 parking spaces across three stories, a small decrease from 650 spaces on three floors under the Project.

Under Alternative 2, on the East Transportation and Hotel Site, no parking structure nor public parking use would be provided; the site would only serve buses, Transportation Network Company (TNC) vehicles and taxis via a surface parking and pickup/drop-off lot. Further, under this alternative no hotel would be constructed on the Hotel Site, a decrease in the size of the Project Site of 1.25 acres, or about 4.5 percent.

Finally, construction of the proposed replacement well on the Well Relocation Site would take place under Alternative 2.

Under Alternative 2, employment on the Project Site would be reduced because the LA Clippers would not move their team offices and practice facility to the Project Site, and the sports medicine, hotel, retail/restaurant, and community uses would be eliminated. In total, this would reduce the non-event employment on the Project Site from approximately 768 under the Project to approximately 75 under Alternative 2. Event-related employment would remain the same as under the Project.

### **Relationship to Project Objectives**

The Reduced Project Size Alternative would meet some, but not all of the City's objectives for the project. Alternative 2 would achieve City Objective 10 as it would lessen the severity of a number of significant impacts of the Project. The City objectives to promote economic development, the economic health and welfare, and City revenues (City Objective 2); to strengthen the community by providing public and youth-oriented space (City Objective 4); and to create employment and construction-related

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<sup>9</sup> Wikipedia, List of National Basketball Association arenas, accessed July 7, 2019, [https://en.wikipedia.org/wiki/List\\_of\\_National\\_Basketball\\_Association\\_arenas](https://en.wikipedia.org/wiki/List_of_National_Basketball_Association_arenas).  
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employment opportunities in the City of Inglewood (City Objective 7) would only be partially met under this alternative as no retail use, team practice facility, sports medical clinic or team offices would be included.

With regard to the City's longstanding goals articulated in the General Plan Land Use Element which call for the promotion of economic development, and as reflected in City Objective 2, Alternative 2 would generate a materially lower level of economic activity on the Project Site compared to the Proposed Project. (See ESA Alternatives Memo, pp. 5-6.) Specifically, Alternative 2 would result in the following reductions in direct and indirect economic activity in the City of Inglewood economy compared to the Project:

**Comment [U8]:** Suggest note all numbers as "approximately"

- Construction of the smaller Alternative 2 would result in 1,109 fewer jobs, with construction employee compensation reduced by a net of \$66.7 million, and a reduction of total economic activity of approximately \$150.2 million.
- On-going operations of Alternative 2, net of elimination of existing uses, would result in a decrease in employment of 545 jobs, with annual employee compensation reduced by \$38.7 million, and annual total economic activity reduced by approximately \$81.6 million.

(ESA Alternatives Memo, p. 5.)

In addition to overall reductions in employment and economic activity in the City of Inglewood, Alternative 2 would have correlative reductions in revenues to the City. As discussed in the same economic study cited above, Alternative 2 would result in a reduction in revenue to the City of approximately \$2.8 million per year. (*Ibid.*) This estimate is considered conservative in that it does not account for potential reductions in parking taxes (there would be fewer parking spaces in Alternative 2 than the Proposed Project, but this has not been accounted for because displaced parking could still occur in the City), and construction taxes which are based on factors such as contractor earnings in the City, construction materials sales in the City, and the commercial building value permit based on total construction costs. (ESA Alternatives Memo, p. 7.) The reduction in construction under Alternative 2 would also reduce the revenue to the Inglewood Unified School District by approximately \$175,000 as a result of reduced payment of school impact in-lieu fees, further undermining the City's objective to promote City revenues. (*Id.* at p. 7.)

Furthermore, the elimination of the team practice facility, sports medical clinic, and team office means that 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. As such, Alternative 2 would be less responsive to City Objective 10 because it would be less environmentally conscious than the Project.

Lastly, Alternative 2 would be less responsive than the Proposed Project to the City's objective to "transform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA)

grants to the City.” As discussed above under Alternative 1, the intent of the AIP program is that the land in question acquired by the City and Successor Agency be cleared of incompatible uses, and that the grant recipients use their best efforts to dispose of the land at fair market value for development with airport compatible uses. Under Alternative 2, the East Transportation Hub and Hotel site would not be developed as under the Proposed Project. These parcels would instead remain vacant. (ESA Alternatives Memo, p. 10.)

With regard to the project applicant’s objectives, the Reduced Project Size Alternative (Alternative 2) would meet some but not all of the project applicant’s objectives for the Project. Under this alternative the arena would have 500 fewer seats than identified in project applicant Objectives 1a and 1d. In addition, the project applicant’s goal of consolidating team facilities (project applicant Objective 1e) and providing complementary retail (project applicant Objective 1e) would also not be met under the Reduced Project Size Alternative, as no team facilities and retail development would be provided. The elimination of retail and hotel uses under this alternative would be less responsive to meeting the intent of project applicant Objective 1f related to providing public benefits such as opportunities for youth- and community-oriented programs and increasing revenues by property and sales taxes and potential transient occupancy taxes. Alternative 2 would also be less responsive to project applicant objective 3a, which reflects the applicant’s intent to create a year-round, active environment, with a daily population on-site that would support nearby retail and community-serving uses, and avoid creating an area that would be devoid of activity outside of the period immediately before and after scheduled events. (See ESA Alternatives Memo, pp. 8-9.) Finally, the absence of a complementary uses such as a team practice facility, sports medical clinic, team offices, retail and public uses under this alternative would fail to meet project applicant Objectives 2 and 2d.

### **Comparative Impacts**

Table 6-2 at the end of Chapter 6.0, Alternatives, of the EIR has an impact-by-impact comparison of the significant impacts of the Project and Alternative 2.

### ***Impacts Identified as Being the Same or Similar to the Project***

#### **Aesthetics**

Although a number of uses would be removed from the Project, many of the impacts of the Project on environmental resources affected by the size and location of the Project Site would be either the same, or nearly so. Alternative 2 would include the Arena Structure and West Parking Garage essentially as proposed under the Project, including the South Prairie Avenue pedestrian bridge. As such, aesthetic impacts to views north and south on South Prairie Avenue would remain unchanged. There would be a modest reduction in the amount of development visible to motorists on West Century Boulevard due to the elimination of the hotel development on the East Transportation Site and the elimination of the plaza development on the Arena Site, however the larger structures that would remain, including the Arena Structure and the West Parking Garage, would continue to be visually present in views east and west on West Century Boulevard (Impact 3.1-1). Finally, impacts related to spillover lighting at nearby residential

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structures would remain essentially the same as under the Project (Impacts 3.1-2 and 3.1-5), with the same required mitigation measures.

### **Biological Resources**

Because the same tree removal would occur under Alternative 2 as under the Project, impacts related to disturbance to nesting raptors or migratory birds (Impact 3.3-2) and loss of protected trees (Impacts 3.3-3) would be identical to those described for the Project, with the same required mitigation measures.

### **Cultural and Tribal Cultural Resources**

Because the Project Site would be essentially the same as under the Project, the construction impacts of Alternative 2 that are related to demolition, ground-disturbance and excavation would be similar to the Project although lessened by approximately 4.5 percent as there would be no ground disturbance associated with the planned hotel on 1.25 acres of the East Transportation Site under Alternative 2. Therefore, damage to unknown historical resources, archaeological resources, or tribal cultural resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-5, 3.4-6, and 3.4-7), and/or unknown human remains (Impacts 3.4-4 and 3.4-8) would be reduced, but would still require mitigation.

### **Geology and Soils**

Impacts related to geology and soils conditions and hazards, including paleontological resources would be similar to those described for the Project. Because Alternative 2 would occur on the same Project Site as the Project, the same geological and soils conditions that would be encountered in construction of Alternative 2 would be the same as with the Project. Because there would be less ground-disturbing activity because of the reduced amount of development in Alternative 2, the potential for erosion and accidental discovery of paleontological resources would be correspondingly decreased (Impacts 3.6-2 and 3.6-4). However, these impacts would continue to be potentially significant under Alternative 2 and would require the same mitigation measures as identified for the Project in order to reduce the impact to less than significant.

### **Hazards and Hazardous Materials**

Impacts related to the transport, handling, and disposal of hazardous materials would remain essentially the same as under the Project (Impact 3.8-1), with adherence to the same federal, State and local regulations. There would be a decrease in the numbers and types of businesses on the Project Site under Alternative 2, but these decreases would be insufficient to change the conclusions about significance or the requirement for adherence to federal, State and local regulations. In addition, exposure to contaminated soils (Impact 3.8-4) under Alternative 2 would be reduced by approximately 4.5 percent as there would be no ground disturbance associated with the planned hotel on 1.25 acres of the East Transportation Site, but mitigation would still be required. Finally, hazards to air navigation (Impact 3.8-5) under Alternative 2 would be the same as the Arena Structure and the construction cranes required to construct the arena would be the same height as with the Project, and thus would penetrate imaginary airspace surfaces set by the FAA for LAX; the same mitigation would be required.

### **Hydrology and Water Quality**

Impacts of Alternative 2 associated with soil erosion during construction and storm water drainage post-construction would also be similar to the Project but somewhat lessened as the planned hotel on the East Transportation and Hotel Site would not be constructed under Alternative 2. As a result of the site being reduced in size by about 1.25 acres, impacts related to degradation of water quality during construction and post-construction (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4) and inadequate site drainage (Impacts 3.9-3 and 3.9-6) would be reduced by about 4.5 percent, but would still require mitigation.

### **Land Use and Planning**

Like the Project, Alternative 2 would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

### **Noise**

Traffic noise impacts of Alternative 2 would be essentially unchanged under Alternative 2. Under normal conditions, a doubling of traffic generates an increase in ambient noise of about 3 dB. Reciprocally, it would take a reduction of about 50 percent to result in a noticeable change in the noise impacts of the project. As reported below, this alternative would result in a reduction in traffic of about 3 percent. Thus, traffic noise effects of Alternative 2 would be the same as those of the Project (Impacts 3.11-2 and 3.11-6; Final EIR, pp. 3-334—338 [Responses to Comments Channel-40 and Channel-43]).

Like the Project, Alternative 2 would not expose people within portions of the Project Site where there is an expectation of quiet to excessive noise levels from aircraft operations at nearby LAX as the hotel and team medical clinic would not be constructed on the Project Site. For this reason, noise impacts associated with aircraft operations (Impacts 3.11-4 and 3.11-8) would be avoided, as with the Project.

### **Public Services**

Because impacts of the Project on public services, including fire and police protection, and parks and recreation facilities would be largely driven by event activity at the proposed arena, these impacts would remain largely unchanged and would continue to be less than significant (see Impacts 3.13-1 through 3.13-10), under Alternative 2.

### **Transportation and Circulation**

Under Alternative 2, the slightly reduced capacity of the arena would reduce vehicle trip generation in the pre-event and post-event peak hours for major events in the weekday and weekend evenings by approximately 3 percent. This slight reduction in trips would not materially reduce the significant impacts found for the Project on intersections, neighborhood streets, and freeway facilities under either Adjusted Baseline or Cumulative conditions with or without concurrent events at The Forum or the NFL Stadium (Impacts 3.14-1 through 3.14-9, Impacts 3.14-16 through 3.14-24, Impacts 3.14-28 and 3.14-29, and Impacts 3.14-33 and 3.14-34).

Similar to the Project, Alternative 2 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic (Impacts 3.14-11, 3.14-25, 3.14-30, and 3.14-35).

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Construction impacts on traffic were determined to be significant for the Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the arena and West Parking Garage under Alternative 2 would likely involve the same temporary lane closures. Therefore, construction impacts for Alternative 2 would be similar to those for the Project.

Although Project-related congestion would be slightly less than under the Project, the potential impact on emergency access to the CHMC would be essentially the same, and would require mitigation to be less than significant, as under the Project.

### **Utilities and Service Systems**

Because the amount of impervious surfaces in Alternative 2 would be very similar to those under the Project, impacts related to storm drainage system capacity (Impacts 3.15-9 and 3.15-10) would be essentially the same as under the Project, with the same required mitigation measures.

### ***Impacts Identified as Being Less Severe than the Project***

#### **Air Quality and Greenhouse Gas Emissions**

Air Quality and GHG emissions during construction and operation under Alternative 2 would be similar to the Project but the reduced seating capacity of the arena and elimination of the other proposed ancillary uses (i.e., retail shops, outdoor stage, team practice facility, sports medical clinic, team offices) on the Arena Site and the hotel on the ~~planned hotel on the~~ East Transportation Site would reduce the amount of construction, and would reduce the overall amount of associated traffic by 3 percent. There would be a corresponding decrease in criteria pollutant emissions, localized maximum daily operational emissions (NO<sub>2</sub>), and GHG emissions. Therefore, similar to the Project, Alternative 2 would conflict with implementation of the applicable air quality plans, as operational emissions associated with the alternative, though reduced, would still exceed thresholds established by the SCAQMD for criteria air pollutants (Impact 3.2-1 and 3.2-5).

Impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6), localized maximum daily operational emissions (NO<sub>2</sub>) (Impacts 3.2-3 and 3.2-7), and GHG emissions (Impact 3.7-1) would be reduced by approximately 3 percent, but would still require the implementation of Mitigation Measure 3.2-2(a), which would require the implementation of a Transportation Demand Management (TDM) program (Mitigation Measure 3.14-2(b)), Mitigation Measure 3.2-2(b), which would require the testing of the emergency generators and fire pump generators on non-event days, Mitigation Measure 3.2-2(c), which would require preparation and implementation of a Construction Emissions Minimization Plan, Mitigation Measure 3.2-2(d), which would require the project applicant to encourage the use of zero- and near-zero emissions vendor and delivery trucks, Mitigation Measure 3.7-1(a), which would require the implementation of a GHG reduction plan, and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the project below the no net new GHG emissions threshold of significance.

### **Energy Demand and Conservation**

Energy demand during construction and operation under Alternative 2 would be similar to the Project but lessened because the capacity of the arena would be reduced by 3 percent. This alternative would not include additional team facilities (i.e., team practice facility, sports medical clinic, and team offices) at the Project site, although the team offices and practice facility would continue to be used in their current sites. The planned hotel on the East Transportation Site would not be included, and thus would reduce the amount of energy demanded (Impacts 3.5-2 and 3.5-4).

### **Noise and Vibration**

Noise levels under Alternative 2 would be similar to the Project but lessened as the seating capacity of the arena would be reduced by 3 percent and none of the other proposed facilities (i.e., retail shops, outdoor stage, team practice facility, sports medical clinic, and team offices) on the Arena Site and the ~~hotel on the~~ planned hotel on the East Transportation Site would be constructed. (Final EIR, pp. 3-334—336 [Response to Comment Channel-40]). Therefore, impacts associated with a temporary increase in noise during construction and a permanent increase in noise during operation (Impacts 3.11-1, 3.11-2, 3.11-5 and 3.11-6) would be reduced as the duration of construction noise would be shorter (due to less building space) and the amount of traffic would decrease (due to fewer trips). In addition, vibration levels under Alternative 2 would also be similar to the Project but lessened for the same reasons. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-7) would be reduced, but would still require the implementation of Mitigation Measures 3.11-3(a) through (c), which requires minimum distances of construction equipment from sensitive receptors and the designation of a construction relations officer to field vibration-related complaints.

### **Population, Employment and Housing**

Impacts related to Population, Employment and Housing (Impacts 3.12-1 through 3.12-4) would remain less than significant under Alternative 2, although non-event-related employment generation on the Project Site would be reduced by about 90 percent. Because under Alternative 2 non-event-related employment on the Project Site would be reduced by about 90 percent, impacts on public schools (Impacts 3.13-11 and 3.13-12), already less than significant for the Project, would be further reduced under Alternative 2. The arena under Alternative 2 would be expected to generate a total of 35 new school students, a reduction of 15 students compared to the 50 students under the Project as described in Table 3.13-9.

### **Transportation and Circulation**

The elimination of the ancillary uses in Alternative 2 would avoid the significant impacts identified for the Project's ancillary uses and hotel at intersections and neighborhood streets (Impacts 3.14-1 through 3.14-6, Impacts 3.14-16 through 3.14-21, Impacts 3.14-28, and 3.14-33). As discussed on page 6-29 of the Draft EIR, the elimination of the ancillary uses in Alternative 2 would avoid the significant impacts identified for the Project's ancillary uses and hotel at study area intersections and along neighborhood streets. (See Final EIR, pp. 3-336, 3-338—3-339 [Responses to Comments Channel-40 and Channel-44].)

The slight reduction in venue capacity would reduce the significant VMT impacts identified for events at the venue, but not to a less than significant level. The elimination of the ancillary uses and hotel would avoid the significant VMT impacts identified for the Project hotel use (Impact 3.14-10).

### **Utilities and Service Systems**

Under Alternative 2, utility demands would be proportionately decreased as a result of the decreased capacity of the arena, and elimination of the practice facility, team offices, and sports medicine clinic in the Arena Structure, as well as the retail/restaurant, community, and hotel uses. Water demand of Alternative 2 would be approximately 48 percent lower than under the Project. Wastewater generation of Alternative 2 would be about 31 percent lower than under the Project. Solid waste generation of Alternative 2 would be approximately about 37 percent lower than under the Project.<sup>10</sup> As a result, impacts with respect to water supply (Impacts 3.15-2 and 3.15-4), wastewater treatment capacity (3.15-5, 3.15-7), and solid waste disposal capacity (3.15-11 and 3.15-13) would be less than significant under both the Project and Alternative 2.

### ***Impacts Identified as Being More Severe than the Project***

#### **Noise**

The impact of event-related noise on nearby sensitive receptors would be exacerbated under the Reduced Project Size Alternative. Plaza events that utilize amplified sound, including pre- or post-game concerts, would be more exposed due to the lack of intervening structures in the plaza meaning that more noise would escape the Project Site, and would travel greater distances, affecting more sensitive receptors. (Final EIR, pp. 3-337—338 [Response to Comment Channel-43].) 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 all be exposed to substantially higher levels of noise than disclosed for the Project (Impacts 3.11-2 and 3.11-6). Mitigation of these effects would either involve (1) reductions in the level of amplification for plaza events, or (2) construction of intervening walls or structures to obstruct line-of-sight between the plaza and nearby sensitive receptors.

#### **Transportation and Circulation**

Although few of the impacts of the Reduced Project Size Alternative would be more severe than those of the Project, it is notable that Alternative 2 would fail to respond to several policies of the City of Inglewood General Plan which encourage the development of employment-generating uses in the City. Further, by eliminating the potential to consolidate LA Clippers team uses, including the arena, practice facility, sports medicine and treatment facilities, and team offices in a single location, Alternative 2 would likely increase the amount of travel between these uses that are currently located disparately throughout the region. The result of this would be increased trip-making and increased VMT. Further, the elimination of complementary ancillary uses on the Project Site would likely increase trip-making and VMT for both

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<sup>10</sup> Memorandum – IBEC Alternative 2 – Wastewater & Solid Waste Generation, July 18, 2019.  
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regular daytime employees as well as for event attendees who would have to travel to other locations for food and drink, hotels, and other activities (Impact 3.14-10). These effects would tend to exacerbate the generation of air pollutants, GHG emissions, congestion, and other such effects at a regional level. Further explanation of the ways in which transportation impacts under Alternative 2 would be more severe than those of the Project was provided in response to comments on this point in the Draft EIR. (Final EIR, pp. 3-338—3-339 [Response Comment Channel-44].)

### **Basis for Finding**

Alternative 2 (Reduced Project Size) would avoid or lessen some impacts associated with the Project; however, this alternative would not further some of the key City objectives related to promoting economic development, as well as the project applicant's objectives related to consolidating team facilities, providing complimentary retail, and providing public benefits such as opportunities for youth- and community-oriented programs and increasing revenues by property and sales taxes and potential transient occupancy taxes. Because implementation of Alternative 2 would eliminate over 1,100 construction jobs and 545 on-going operational jobs, approximately \$150 million in economic activity in the City during construction would be eliminated. (ESA Alternatives Memo, p. 7.) Additionally, once the Project commences operations, each year nearly \$82 million in economic activity in the City, and approximately \$2.8 million in annual revenues to the City and \$176,200 in fees to the Inglewood Unified School District would be eliminated. (*Ibid.*)

**Comment [U9]:** Suggest that all numbers be stated as "approximately".

In addition to economic-related impacts, because it is assumed that the LA Clipper's offices would remain in Downtown Los Angeles under Alternative 2, members of the team front office would have a much longer trip from the team's offices in Downtown Los Angeles and to the new arena in Inglewood to attend games or other arena events. During off-peak hours it takes approximately 20-25 minutes to make this trip using the I-110 and I-105 freeways and South Prairie Avenue. However, during the PM peak hour, which would occur shortly before games typically start on weekdays, travel times could approximately double. As a result, employees would spend up to an hour traveling, which is time that could be put to more productive use if their offices were co-located with the arena – an identified objective of the applicant (project applicant Objective 1c).

Alternative 2 would also be less successful in establishing complimentary ancillary uses on the Project Site, and would therefore fail to achieve transportation benefits associated with encouraging patrons to travel to or from the site at off-peak times. (ESA Alternatives Memo, pp. 9-10.) For each and all of these reasons, Alternative 2 would be materially worse than the Project in terms of its ability to meet the City's goals to promote economic development that would generate opportunities for the City's residents.

The City Council rejects Alternative 2 (Reduced Project Size) on each of these grounds independently. All of the reasons provide sufficient independent grounds for rejecting this alternative.

### **Finding**

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible Alternative 2.

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### **3. Alternative 3: City Services Center Alternative Site**

#### **Description**

Under Alternative 3, key elements of the Project would be developed on a site in Downtown Inglewood, located approximately 1.5 miles northwest of the Project Site (see Figure 6.2). The focus of this alternative is to identify the impacts that would occur if the arena and as much of the other elements of the Project as feasible are developed at another site within the City of Inglewood that is not as proximate to The Forum and the NFL Stadium, as a means of avoiding or lessening the traffic and related impacts of concurrent events at these facilities. The City determined that there is one such site that may meet these criteria and provides sufficient land to accommodate the arena, some parking, and plaza uses potentially available.

Specifically, Alternative 3 would be located on an approximately 9.7-acre site that encompasses the majority of a block bound by West Beach Avenue on the north, West Ivy Avenue on the east, Cable Place and the future Crenshaw/LAX light rail right-of-way on the south, and North Eucalyptus Avenue on the west. The Alternative 3 site is presently occupied by a City-owned corporation yard, known as the Inglewood City Services Center, and a firefighter training academy owned and operated by El Camino College. One existing building on the Alternative 3 site includes ground-level maintenance bays for vehicle and equipment maintenance, uncovered parking and a fuel island on the second floor accessible from Cable Place to the south of the site, and three floors of office space. Uncovered parking and material stockpiles and storage areas are also present in the City Services Center. Facilities on the firefighter training academy portion of the site include a classroom building, practice tower, and a “burn” building.

Regional access to the Alternative 3 site is provided by the San Diego Freeway (I-405), located approximately 0.6 miles to the west, and the Glenn Anderson Freeway & Transitway (I-105), located 2.3 miles to the south. Interstate 405 is located about 0.7 miles closer to the City Services Center Alternative site than to the Project Site, while I-105 is located about three times as far from the City Services Center Alternative site (2.4 miles) than from the Project Site (0.8 miles). Local access to the City Services Center Alternative site is provided by several major arterials, including Florence Avenue and La Brea Avenue, which serve the area near the City Services Center site. Transit access to the City Services Center Alternative site is provided by several bus lines and the future Crenshaw/LAX light rail line. The closest bus stop to the City Services Center Alternative site is a block north along North La Brea Avenue, and the nearest light rail station to the City Services Center Alternative site is about 0.25 miles to the east along Florence Avenue. The Alternative 3 site is located approximately 1.5 miles northwest of The Forum, and approximately 2 miles northwest of the site of the NFL Stadium.

Uses in the immediate vicinity of the City Services Center Alternative site include the Marvin Engineering Company industrial complex north and adjacent to the City Services Center site, manufacturing and single-family residential uses to the north across West Beach Avenue and manufacturing and warehouse uses to the east across Ivy Avenue. There are also churches to the west of the site across North Eucalyptus Avenue. With the exception of a three-story structure along West Beach Avenue, all of the remaining uses to the north and east of the site are located in one-story structures,

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including three single family homes on the north side of West Beach Avenue, east of West Hazel Street. An electrical substation is located across the future Crenshaw/LAX light rail line right-of-way to the south and a single-story commercial wholesale building is located to the south across Cable Place. The City's Sanford M. Anderson Water Treatment Plant is located to the west across North Eucalyptus Avenue.

The City Services Center Alternative site and the surrounding area are designated Downtown Transit-Oriented Development (TOD) in the City of Inglewood General Plan. The City Services Center Alternative site and the area to the north, east, and south of the site is zoned MU-2, TOD Mixed Use 2, while the area to the west of the site is zoned O-S, Open Space.

Alternative 3 would involve the demolition of the facilities that presently occupy the City Services Center and firefighter training academy areas and the construction of an arena and parking structures that would open to a pedestrian plaza that would include an outdoor stage (see Figure 6 2). Similar to the Project, the arena under this alternative would have a capacity of 18,000 attendees in an NBA basketball configuration, and up to 18,500 in certain concert configurations. The arena would be located on the southeast portion of the site while Parking Structure A would be situated on the southwestern portion of the site and Parking Structures B and C would be situated on the northeastern portion of the site. Access to the arena would be provided on West Beach and North Eucalyptus avenues via a pedestrian plaza. Parking Structure A would be accessed from North Eucalyptus Avenue while Parking Structures B and C would be accessed from West Beach Avenue. In addition, approximately up to 48,000 square feet of ground floor retail oriented towards the pedestrian plaza would be provided on the lower level of Parking Garages A and B and along the northwestern border of the site.

The proposed parking structures on the City Services Center Alternative site would include 4,215 parking spaces, which is the same amount of parking provided by the Project. In addition, off-site parking for events at the arena would be provided by an existing parking structure owned and operated by the Faith Central Bible Church. The existing structure is located approximately 800 feet to the southwest of the Project Site along Florence Avenue and would provide up to 860 additional parking spaces.

At 9.7 acres, the Alternative 3 site would be approximately 35 percent of the size of the Project Site. As a result, none of the other team facilities proposed by the Project (e.g., team practice facility, sports medical clinic, and team offices) would be constructed under Alternative 3 as the site is not of sufficient size to accommodate the additional square footage. The LA Clippers' team offices would continue to be located on Flower Street within two blocks of Staples Center while the LA Clippers would continue to use their practice and training facility in the Playa Vista neighborhood of Los Angeles. In addition, this alternative would not include a hotel or a new potable water well because existing uses would remain in their existing locations on the Project Site.

Finally, under Alternative 3, all of the uses that presently occupy the City Services Center and the firefighter training academy would be relocated to the Arena Site along West Century Boulevard. Unlike the Project, the relocation of these uses would not require the vacation of either West 101st Street or West 102nd Street. In addition, these uses would only require approximately 10 acres of the Arena Site.

### **Relationship to Project Objectives**

The City Services Center Alternative would meet some of City's objectives for the project. In particular, the project would meet the City's goals of becoming a regional sports and entertainment center (City Objective 1) and stimulating economic development (City Objective 2). In addition, given the location of the site near the future Crenshaw/LAX light rail line, Alternative 3 would also meet the City's goal of encouraging public transit opportunities (City Objective 6).

Although Alternative 3 would include relocation of current City Services Center and the firefighter training academy uses to the Arena Site portion of the Project Site, it would result in a less intensive use of the Project Site than the Project. Because City Objective 5 is to "[t]ransform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City," Alternative 3 would not be as responsive to this objective as the Project. In addition, the elimination of the team practice facility, sports medical clinic, and team offices means that 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. As such, Alternative 3 would be less responsive to City Objective 10 because it would be less environmentally conscious than the Project.

The City Services Center Alternative would also meet some, but not all, of the project applicant's objectives for the project. First, because constructing on the City Services Center Alternative site would first require designing and constructing replacement uses on the Project Site, it is uncertain if this alternative site would allow the applicant to begin hosting LA Clippers home games in the 2024–2025 season, and thus could be unable to meet project applicant Objective 1a. (ESA Alternatives Memo, p. 10.)

Additionally, the Alternative 3 site does not meet the definition of "project area" included in PRC section 21168.6.8(a)(5). As a result of this change, should the adequacy of the EIR be litigated, rather than the AB 987 dictated 270-day process for legal proceedings, including any potential appeals, the project would be subject to the established legal process which can take three or more years. As a result of a more extended legal process, litigation regarding the adequacy of the EIR for Alternative 2 would likely obstruct the ability to meet the project applicant's schedule objective to open in time for the 2024-25 NBA season.

Moreover, because AB 987 would not apply at this site, the measures that the project applicant has committed to in the Greenhouse Gas (GHG) reduction plan, which includes a number of local measures that would provide benefits in the City of Inglewood, would not be implemented under Alternative 3. (ESA Alternatives Memo, pp. 11-12.)

Alternative 3 would also not meet the project applicant's goal of consolidating team facilities on one site (project applicant Objective 1b) as the team practice facility, sports medical clinic, and team offices would continue to be located in Downtown Los Angeles and Playa Vista, respectively.

Alternative 3 would only partially meet the project applicant's goal of contributing to the economic and social well-being of the community as the elimination of the hotel under the City Services Center

Alternative would result in the loss of revenue from transient occupancy taxes (project applicant Objective 1f). The City Services Center Alternative site would be approximately 35 percent of the size of the Project Site, and would provide fewer amenities, thus the project would not be as competitive with other major entertainment venues as it would be on the Project Site, and it would not provide sufficient complementary on-site uses to sustain the project on non-event days (project applicant Objectives 2b and 2d). Finally, the project would not be located on a site near other similar uses (i.e., the future stadium) within the HPSP area under the City Services Center Alternative. As a result, Alternative 3 would not combine with the future stadium to create a dynamic, year-round sports and entertainment district destination in the southwestern portion of the City (project applicant Objective 3a).

### **Comparative Impacts**

Table 6-2 at the end of Chapter 6.0, Alternatives, of the EIR has an impact-by-impact comparison of the significant impacts of the Project and Alternative 3. In addition, the comparative analysis of environmental effects provided below was informed by the Downtown Inglewood and Fairview Heights Transit Oriented Development (TOD) Plan Program EIR<sup>11</sup>, which provided information relating to existing conditions in and around the City Services Center site.

### ***Impacts Identified as Being the Same or Similar to the Project***

Although the size of the City Services Center Alternative site is only about 35 percent of the size of the Project Site, Alternative 3 also involves relocation of uses from the City Services Center Alternative site to the Project Site, and thus a number of impacts would be similarly likely to occur despite the reduced size of the site for the construction of the Project.

### **Aesthetics**

Like the Project developed at the Project Site, Alternative 3 would introduce more intensive and dense uses than current development at the City Services Center site. At this location, there are limited long-range views to be affected by the larger structures that would be developed under this alternative (Impact 3.1-1). Like at the Project Site, there are a few residences in close proximity to the City Services Center site. As a result of the rather low intensity of use along West Beach Avenue, it is likely that nighttime light levels at the existing homes that are across the street from this site are less than two foot-candles at the property line. With the addition of Alternative 3 at this location, the potential exists for outdoor lighting, building façade lighting, and illuminated signage on the arena and/or parking structures that would face the residences to result in light levels in excess of the significance threshold (Impacts 3.1-2 and 3.1-5). This would be similar to the impacts of the Project on adjacent sensitive receptors, and would be mitigated through implementation of Mitigation Measures 3.1-2(a) and (b).

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<sup>11</sup> City of Inglewood, 2016. *Downtown Inglewood and Fairview Heights Transit Oriented Development Plan Program EIR*. November 1, 2016.

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### Biological Resources

A number of trees are located on and/or adjacent to the City Services Center site. In addition, as discussed in Section 3.3, Biological Resources, a number of trees are also located on and/or adjacent to the Arena Site where the City Services Center and fire academy would be relocated. As a result, Alternative 3 could disturb nesting raptors or migratory birds (Impact 3.3-2) and result in the loss of protected trees (Impact 3.3-3). Mitigation Measures 3.3-2 and 3.3-3 would reduce these impacts by requiring that steps be taken to protect these resources during construction. As a result, impacts on nesting raptors or migratory birds and protected trees would be similar to those described for the Project.

### Cultural and Tribal Cultural Resources

Like the Project Site, there are no known archaeological or historical resources located on the City Services Center site. However, according to the TOD EIR, it is likely that development in Downtown Inglewood, including on the City Services Center site, could disturb buried archaeological resources,<sup>12</sup> and disturb unknown human remains.<sup>13</sup> In addition, as discussed in Section 3.4, Cultural and Tribal Cultural Resources, unknown archaeological resources, and human remains may also be located on the Arena Site where the City Services Center and fire academy would be relocated. For these reasons, it is possible that, like with the Project, implementation of Alternative 3 could cause a substantial adverse change in the significance of unknown historic, archaeological, or tribal cultural resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-5, 3.4-6, and 3.4-7), and/or unknown human remains (Impacts 3.4-4 and 3.4-8). Mitigation Measures 3.4-1 and 3.4-4 would reduce these impacts by requiring that work stop if such resources are uncovered, and that the resources be appropriately evaluated and treated. Therefore, impacts on archaeological resources and human remains would be similar to the Project.

### Geology and Soils

Impacts related to geology and soils conditions and hazards, including paleontological resources would be similar to those described for the Project (see Section 3.6, Geology and Soils). Because Alternative 3 would occur approximately 1.7 miles from the Project Site, the geological and soils conditions that would be encountered in construction of Alternative 3 would be essentially the same as with the Project. The proximity of the City Services Center Alternative site to the historic Centinela Creek and nearby seismic faults could indicate the potential for unstable soils, but any impacts would be avoided by required compliance with the California Building Code. According to the TOD EIR, it is likely that development in Downtown Inglewood, including on the City Services Center site, could disturb previously unknown unique paleontological resources,<sup>14</sup> but because there would be less ground-disturbing activity because of the reduced amount of development in Alternative 3, the potential for erosion and accidental discovery of paleontological resources would be correspondingly decreased (Impacts 3.6-2 and 3.6-4). However, these

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<sup>12</sup> City of Inglewood, 2016. *Downtown Inglewood and Fairview Heights Transit Oriented Development Plan Program EIR*. November 1, 2016. p. 4.D-14.

<sup>13</sup> City of Inglewood, 2016. *Downtown Inglewood and Fairview Heights Transit Oriented Development Plan Program EIR*. November 1, 2016. p. 4.D-18.

<sup>14</sup> City of Inglewood, 2016. *Downtown Inglewood and Fairview Heights Transit Oriented Development Plan Program EIR*. November 1, 2016. p. 4.D-16.

impacts would continue to be potentially significant under Alternative 3 and would require the same mitigation measures as identified for the Project in order to reduce the impact to less than significant.

### **Hazards and Hazardous Materials**

A known Leaking Underground Storage Tank (LUST) is located approximately 0.14 miles to the southwest of the City Services Center Alternative site and a petroleum spill occurred approximately 100 feet to the south of the site.<sup>15</sup> It is possible that releases from these sites may have migrated to the City Services Center site. In addition, the presence of a fuel island and ongoing vehicle and equipment maintenance activities in the service bays could indicate that unknown soil contamination may be present on the City Services Center site. Furthermore, as discussed in Section 3.8, Hazards and Hazardous Materials, unknown soil contamination may be present on the Arena Site given its land used history and the results of soil testing. As a result of these conditions at the City Services Center site, under Alternative 3, as with the Project, it is possible that construction workers could be exposed to contamination during ground disturbing activities (Impact 3.8-4). Mitigation Measure 3.8-4 would require the preparation and approval of the Soil Management Plan prior to initiating earthwork activities, which would reduce the potential for worker exposures. For this reason, impacts related to on-site contamination would be similar to those described for the Project.

### **Hydrology and Water Quality**

The City Services Center Alternative site is fully developed with impervious surfaces; pervious surfaces on the site are minimal and include ornamental landscaping. Sheet flow stormwater runoff on the City Services Center Alternative site is managed by an existing system of storm drains. Further, the site is bisected, east-to-west, by a drainage that is encased in a below-grade culvert and would be required to be relocated as part of development of the site. In addition, as discussed in Section 3.9, Hydrology and Water Quality, the Arena Site is partially developed with large portions of previously developed ~~development~~ but now vacant land.

As a result, it is possible that construction and operation of Alternative 3 could cause water quality discharges that are not consistent with SWRCB objectives and could degrade the quality of the water that is discharged from the City Services Center Alternative site (due to arena development) and the Arena Site (due to the relocation of the City Services Center land uses) (Impacts 3.6-1, 3.6-3, 3.9-1, and 3.9-4). Altered drainage patterns during both construction and operation on both sites, including the realignment of the below-grade drainage culvert bisecting the City Services Center site, would also have the potential to result in erosion, sedimentation, and/or flooding on or off site by redirecting or concentrating flows (Impact 3.9-3 and 3.9-6). In order to lessen the significance of these impacts for Alternative 3, like the Project, Mitigation Measure 3.9-1(a) would require the project to comply with a number of regulations governing water quality and drainage while Mitigation Measure 3.9-1(b) would require the periodic sweeping parking lots during operation to remove contaminants. As a result, impacts related to water quality and drainage would be similar to the Project.

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<sup>15</sup> State Water Resources Control Board, 2019. GeoTracker database. Accessed: May 9, 2019.  
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### **Land Use and Planning**

Like the Project, Alternative 3 would not result in the division of an established community, nor would it be inconsistent with plans or policies that have been adopted for the purposes of environmental mitigation, and thus Alternative 3 would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

### **Public Services**

Because impacts of the Project on public services, including fire and police protection, parks and recreation facilities, and public schools would be largely driven by event activity at the proposed arena, these impacts would remain largely unchanged and would continue to be less than significant (see Impacts 3.13-1 through 3.13-12) under Alternative 3.

### **Transportation and Circulation**

Under Alternative 3, the ability to walk to the Crenshaw/LAX light rail line Downtown Inglewood Station without the need for shuttling would increase the attractiveness of rail transit, although this effect could be partially offset since only one rail line would be thus accessible. As such, it is anticipated that vehicle trip generation for major events in the arena at the City Services Center Alternative site would be similar to that for the Project.

This alternative would therefore be expected to have intersection, neighborhood street, and freeway facility impacts for major events at a similar level as the Project (Impacts 3.14-1 through 3.14-9, Impacts 3.14-16 through 3.14-24, Impacts 3.14-29 and 3.14-29, and Impacts 3.14-33 and 3.14-34), although distributed across the transportation system differently. Although the City Services Center Alternative site is closer to the I-405 freeway (0.6 miles) than is the Project (1.3 miles), it is farther from the I-110 and I-105 freeways; thus, regional trips would not be distributed as evenly and freeway impacts would be concentrated on the I-405. Furthermore, although Florence Avenue and La Brea Avenue (designated as major arterials in the City of Inglewood General Plan) serve the area near the site, the street grid system breaks down in the north part of Inglewood surrounding the City Services Center Alternative site, with curvier streets, less arterial capacity, and discontinuous streets in the vicinity.

Eucalyptus Avenue and Beach Avenue both travel through residential neighborhoods to the north of the City Services Center Alternative site. Since both of these streets would provide direct access to parking garages for the arena, neighborhood street impacts would be expected on these streets (Impacts 3.14-4 through 3.14-6, and Impacts 3.14-19 through 3.14-21).

The amount of on-site parking under this alternative would be similar to that for the Project, meaning that a substantial amount of parking (roughly 3,700 to 4,100 spaces for a major event) would still need to be provided off site. Some could be accommodated in parking garages in the downtown Inglewood area and in the nearby Faithful Central Bible Church parking structure, but shuttling would be required to off-site parking, presumably at Hollywood Park, to avoid spillover parking into residential neighborhoods.



Similar to the Project, Alternative 3 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic (Impacts 3.14-11, 3.14-25, 3.14-30, and 3.14-35).

Construction impacts on traffic were determined to be significant for the Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the Project at the Alternative 3 site would likely involve temporary lane closures along the Eucalyptus Avenue frontage of the site for construction of a parking garage. Therefore, construction impacts for Alternative 3 would be in a different location, but would be similar in magnitude to those described for the Project.

### **Utilities and Service Systems**

The existing storm drain system in the area of the City Services Center Alternative and Arena sites may not have sufficient capacity to handle post-construction stormwater runoff from each site (Impacts 3.15-9 and 3.15-10). In order to lessen the significance of these impacts for Alternative 3, like the Project, Mitigation Measures 3.15-9 and 3.15-10 would require the project to comply with a number of regulations governing water quality and drainage (Mitigation Measure 3.9-1(a)). As a result, impacts related to stormwater drainage would be similar to the Project.

### ***Impacts Identified as Being Less Severe than the Project***

Because Alternative 3 would be located away from the busy West Century Boulevard and South Prairie Avenue corridors, and because the amount of development in Alternative 3 is less than under the Project, a number of significant impacts of the Project would be lessened or avoided.

### **Aesthetics**

Although the aesthetic impacts of the Project to views and visual character would be less than significant with mitigation, none of the effects described near the Project Site would occur under Alternative 3. There would be development on the Arena Site, but it would be low in scale other than the fire academy tower, and would not be large in scale. Because the streets surrounding the City Services Center Alternative site are narrower and not straight for extended distances, views are relatively constrained, and as such there would be less potential for disruption of long-range views under Alternative 3 (Impact 3.1-1). Further, the significant impacts of increased light at sensitive receptors around the Project Site, including the residences at 10226 and 10204 South Prairie Avenue, as well as residences on the west side of the West Parking Garage Site, would not occur under Alternative 3 as development would not be lit at night (Impacts 3.1-2 and 3.1-5).

### **Air Quality and GHG Emissions**

Air Quality and GHG emissions during construction and operation under Alternative 3 would be similar to the Project but lessened because this alternative would disturb slightly less soil (i.e., 9.7 acres on the City Services Center Alternative site and approximately 10 acres on the Arena Site) and would not include additional team facilities (i.e., team practice facility, sports medical clinic, and team offices), the planned hotel on the East Transportation Site, or a new potable water well, and thus, the duration of

construction would be shorter and fewer trips would be generated during operation. In addition, as discussed under Transportation, below, the elimination of the office, practice facility, sports medicine clinic, and hotel uses in Alternative 3 and the ability to walk to rail transit would reduce weekday peak hour trip generation by the ancillary uses by more than half from that estimated for the Project, with corresponding decreases in both criteria air pollution and GHG emissions directly from the Project. However, the lack of consolidation of the LA Clippers uses on a single site would tend to offset some of these reductions as a result of increased amounts of travel between the Arena Structure, team offices currently located in downtown Los Angeles, and practice facility in Playa Vista.

Therefore, similar to the Project, Alternative 3 would conflict with implementation of the applicable air quality plans, as operational emissions associated with the alternative, though reduced, would still exceed thresholds established by the SCAQMD for criteria air pollutants (Impact 3.2-1 and 3.2-5). In addition, impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6), localized maximum daily operational emissions (NO<sub>2</sub>) (Impacts 3.2-3 and 3.2-7), and GHG emissions (Impacts 3.7-1 and 3.7-2) would be reduced, but would still require the implementation of Mitigation Measure 3.2-2(a), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)), Mitigation Measure 3.2-2(b), which would require testing of the emergency generators and fire pump generators on non-event days, Mitigation Measure 3.2-2(c), which would require preparation and implementation of a Construction Emissions Minimization Plan, Mitigation Measure 3.2-2(d), which would require the project applicant to encourage the use of zero- and near-zero emissions vendor and delivery trucks, Mitigation Measure 3.7-1(a), which would require the implementation of a GHG reduction plan, and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the project below the no net new GHG emissions threshold of significance.

### **Energy Demand and Conservation**

Energy demand during construction and operation under Alternative 3 would be similar to the Project but lessened because this alternative would not include additional team facilities (i.e., team practice facility, sports medical clinic, and team offices), the planned hotel on the East Transportation Site, or a new potable water well, and thus would reduce the amount of energy demanded (Impacts 3.5-2 and 3.5-4).

### **Hazards and Hazardous Material**

Alternative 3 would not result in an air navigation hazard as the City Services Center Alternative site as it is not located within an airport land use area plan. For this reason, hazards impacts associated with air navigation (Impacts 3.8-5) would be avoided under this alternative and Mitigation Measure 3.8-5 would not be required.

### **Noise and Vibration**

As described above, there are three residential homes that are considered sensitive receptors immediately across West Beach Avenue. Construction noise levels under Alternative 3 would also be similar to the Project but lessened in duration as this alternative would not include additional team facilities (i.e., team practice facility, sports medical clinic, and team offices), the planned hotel on the East Transportation Site, or a new potable water well, and thus the construction period would be shorter and fewer vehicle

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trips would be generated during operation. Like with the Project, operational sound from outdoor plaza events from amplification systems would result in significant impacts at sensitive receptors proximate to the City Services Center site, but because compared to the Project there are fewer sensitive receptors that are in close proximity to the City Services Center site, this impact would be less severe than under the Project. Therefore, impacts associated with a temporary increase in noise during construction and a permanent increase in noise during operation (Impacts 3.11-1, 3.11-2, 3.11-5, and 3.11-6) would be reduced, but would still require implementation of Mitigation Measure 3.11-1, which would require the implementation of measures and controls to reduce noise during construction, Mitigation Measure 3.11-2(a), which would require the preparation of an operations noise reduction plan, and Mitigation Measure 3.11-2(b), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)).

Vibration levels under Alternative 3 would also be similar to the Project but lessened as the duration of construction would be shorter. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-6) would be reduced, but would still require the implementation of Mitigation Measures 3.11-3(a) through (c), which requires minimum distances of construction equipment from sensitive receptors and the designation of a construction relations officer to field vibration-related complaints.

Unlike the Project, Alternative 3 would not result in the construction of the hotel and team medical clinic and the City Services Center Alternative site is located entirely outside the 65 dBA contour for aircraft operations from LAX. Thus, Alternative 3 would not expose sensitive receptors within the Project Site to excessive noise levels from aircraft operations, and impacts related to exposure to aircraft noise would be less than significant, like with the Project.

### **Population, Employment and Housing**

Impacts related to Population, Employment and Housing (Impacts 3.12-1 through 3.12-4) would remain less than significant under Alternative 3, although non-event-related employment generation on the City Services Center Alternative site would be reduced by about 62 percent. Because non-event-related employment on the City Services Center Alternative site would be reduced by about 62 percent under Alternative 3, impacts on public schools (Impacts 3.13-11 and 3.13-12), already less than significant for the Project, would be further reduced under Alternative 3. The arena and commercial uses under Alternative 3 would be expected to generate a total of 38 new school students, a reduction of 12 students compared to the 50 students under the Project as described in Table 3.13-9.

### **Transportation and Circulation**

The elimination of the office, practice facility, and sports medicine clinic uses in Alternative 3 and the ability to walk to rail transit would reduce weekday peak hour trip generation by the ancillary uses by more than half from that estimated for the Project, substantially reducing or possibly even avoiding the significant impacts of the ancillary uses at intersections and neighborhood streets (Impacts 3.14-1, 3.14-4, 3.14-16, and 3.14-19).

The elimination of the hotel use would avoid the significant VMT impact identified for the Project hotel use (Impact 3.14-10).

Pedestrian impacts could be lessened since event attendees parking off site at Hollywood Park would be shuttled to the off-site locations and would not have to cross arterial streets to access the off-site parking (Impact 3.14-13).

The nearest emergency room to the Alternative 3 site is located at the Centinela Hospital Medical Center, approximately 1.1 miles from the site. Given that large events at the Alternative 3 site would directly impact La Brea Avenue and Eucalyptus Avenue, two of the primary north-south routes across the future Metro Crenshaw/LAX light rail line within the City of Inglewood, Project-related congestion could impact emergency access to the CHMC from northern portions of the City. This impact would be less severe than emergency access impacts of the Project, but could nonetheless require mitigation to result in a less than significant impact.

Given the location of the City Services Center Alternative site relative to The Forum and the NFL Stadium, Project impacts on intersections, neighborhood streets, freeway facilities, and public transit during concurrent events at The Forum and/or the NFL Stadium would be shifted and somewhat lessened from those for the Project during concurrent events (Impacts 3.14-28 and 3.14-29 and Impacts 3.14-33 and 3.14-34).

#### **Utilities and Service Systems**

Under Alternative 3, utility demands would be proportionately decreased as a result of the elimination of the practice facility, team offices, and sports medicine clinic in the Arena Structure and hotel uses. As described above, these uses would continue to exist and operate in their current locations. Water demand of Alternative 3 would be approximately 31 to 35 percent lower than under the Project. Wastewater generation of Alternative 3 would be about 22 percent lower than under the Project. Solid waste generation of Alternative 3 would be approximately about 22 percent lower than under the Project.<sup>16</sup> As a result, impacts with respect to water supply (Impacts 3.15-2 and 3.15-4), wastewater treatment capacity (Impacts 3.15-5, 3.15-7), and solid waste disposal capacity (3.15-11 and 3.15-13) would be less than significant under both the Project and Alternative 3.

#### ***Impacts Identified as Being More Severe than the Project***

Although the amount of development included in the City Services Center Site Alternative is less than under the Project, the specific aspects of the site create the potential for impacts that would be more severe than under the Project.

#### **Aesthetics**

Because of the narrowness of the surrounding streets and the presence of residential uses immediately across West Beach Avenue, the potential for spillover lighting effects on residential uses is greater than

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<sup>16</sup> Memorandum – IBEC Alternative 3 – Wastewater & Solid Waste Generation, July 18, 2019.

under the Project (Impacts 3.1-2 and 3.1-5). In addition, the location of the residences to the northeast of the Arena Structure and 8-story Parking Structure B and 7-story Parking Structure C that would be located across the street would create the potential for shadows to be cast on the homes in afternoons in the winter (Impact 3.1-3). Due to the over 400-foot length and east-west alignment of the two parking structures, such effects would be longer lasting than shadow effects on homes under the Project and it is likely that these impacts would be significant. If such shadows were significant, mitigation would involve reducing the height of the West Beach Avenue parking structures, which could also materially reduce the available parking on the City Services Center Alternative Site.

### **Transportation and Circulation**

Of the streets immediately bordering the City Services Center Alternative site, Eucalyptus Avenue is designated as a minor arterial, Beach Avenue and Ivy Avenue are designated as collector streets, and Cable Place is a local street. Each of these streets currently provide only one traffic lane in each direction in the vicinity of the alternative site, and Eucalyptus Avenue and Ivy Avenue will have at-grade crossings with the Crenshaw/LAX light rail line. As such, the ability of Eucalyptus Avenue to adequately accommodate peak event flows into and out of Parking Structure A and of West Beach Avenue to adequately accommodate peak event flows into and out of Parking Structures B and C would result in significant street and site access impacts (Impacts 3.14-4 through 3.14-6, and Impacts 3.14-19 through 3.14-21).

### **Basis for Finding**

Alternative 3 (City Services Center Alternative Site) would avoid or lessen some impacts associated with the Project; however, this alternative would also increase impacts to aesthetics and transportation and circulation. As discussed above, this alternative would not further some of the key City objectives related to transforming vacant or underutilized land within the City into compatible land uses within aircraft noise contours, and remaining environmentally conscious. Further, compared to the Project, Alternative 3 would generate a materially lower level of economic activity on the Project Site, and would materially reduce overall revenues to the City and the Inglewood Unified School District, due to the scaled-down size of the alternative. (ESA Alternatives Memo, p. 12.) Project costs would also likely increase under Alternative 3 as the City's corporation yard and the firefighter training academy would be relocated to the Project Site, and the City would likely have to bear the cost of replacing these facilities, preliminarily estimated at \$75-100 million. (*Ibid.*)

Alternative 3 would also be less responsive than the Proposed Project to the City's objective to "transform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City." As discussed above under Alternative 1, the intent of the AIP program is that the land in question acquired by the City and Successor Agency be cleared of incompatible uses, and that the grant recipients use their best efforts to dispose of the land at fair market value for development with airport compatible uses. Under Alternative 3, the proposed Project Site would not be developed as under the Proposed Project. Rather, portions of the Project Site would be developed with a replacement City Services Center and firefighter training academy. These uses would be compatible with the location of the

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Project Site. Nevertheless, because these portions of the site would continue to be owned by the City and the Successor Agency, and other parts of the Project Site would remain vacant or underutilized. (ESA Alternatives Memo, p. 14.)

Compared to the Proposed Project, Alternative 3 also poses several issues relating to potential traffic constraints. As described in the ESA Alternatives Memo, the streets in the vicinity of the City Services Center site are curvier, more discontinuous, and have less arterial capacity than the streets in the vicinity of the Project Site. Similar to the Proposed Project, under Alternative 3 a total of 4,215 parking spaces would be provided in two 8-story and one 7-story parking structures on the City Services Center site. One garage (2,300 spaces) would be accessible via Eucalyptus Avenue and two garages (1,915 spaces) that would be accessible via Beach Avenue. Both Eucalyptus and Beach Avenues are two lane streets that provide direct access the two major arterials near the Project Site – Florence Avenue one block to the south and La Brea Avenue one block to the north/east. Traffic generated by up 4,215 vehicles entering/leaving the City Services Center site before/after events would quickly overwhelm the nearby intersections along Florence and La Brea Avenues, thus forcing traffic through neighborhoods to the north of the site. This traffic would quickly overwhelm the capacity of local street system, thus resulting in traffic gridlock. In addition, although the City Services Center Alternative site is closer to the I-405 freeway (0.6 miles) than is the Proposed Project (1.3 miles), it is farther from the I-110 and I-105 freeways; thus, regional trips would not be distributed as evenly and freeway impacts would be concentrated on the I-405. (ESA Alternatives Memo, p. 14.)

In addition to failing to achieve several of the City's key objectives for the Project, Alternative 3 would not further some of the project applicant's objectives related to contributing to the economic and social well-being of the community, providing sufficient complementary on-site uses to sustain the project on non-event days, and creating a dynamic, year-round sports and entertainment district destination in the southwestern portion of the City. The LA Clipper's team front office would also remain in Downtown Los Angeles under Alternative 3, and the team would continue to use its practice and training facility in the Playa Vista neighborhood of Los Angeles, which would result in longer commute times and less productive use than if the team's offices and practice facilities were co-located with the arena. Other concerns raised by the project architect related to Alternative 3 include difficulties in designing a sufficient loading dock for the arena; the ability to integrate the venue with nearby existing and proposed uses; and the ability to achieve optimal security conditions due to the limited size of the alternative site. (ESA Alternatives Memo, p. 12.) Lastly, as discussed in the EIR and above, "[b]ecause constructing on the City Services Center Alternative site would first require designing and constructing replacement uses on the Project Site, it is uncertain if this alternative site would allow the applicant to begin hosting LA Clippers home games in the 2024–2025 season..." (Draft EIR, p. 6-43; see also ESA Alternatives Memo, p. 10.) Thus, Alternative 3 may prevent the achievement of project applicant objective 1a.

In addition, the Alternative 3 site is infeasible for the following reasons, as set forth in the ESA Alternatives Memo:

- The Alternative 3 site also does not meet the definition of "project area" included in Public Resources Code section 21168.6.8(a)(5). Thus, Alternative 3 would not meet the requirements for compliance

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with AB 987. Due to this change, should the adequacy of the EIR be litigated, rather than the AB 987 dictated 270-day process for legal proceedings, including any potential appeals, the project would be subject to the established legal process which can take three or more years. This more extended legal process would likely obstruct the ability to meet the applicant's schedule objective to open in time for the 2024-2025 NBA season.

- Alternative 3 would not provide the City with the community benefits associated with the AB 987 certification process, particularly with respect to local GHG emission reductions and air pollutant emission reductions.
- It is uncertain whether, under Alternative 3, the project applicant would provide the City with the Community Benefits set forth in Development Agreement Exhibit C, or if those benefits would be materially diminished.

The City Council rejects Alternative 3 (City Services Center Alternative Site) on each of these grounds independently. All of the reasons provide sufficient independent grounds for rejecting this alternative.

#### Finding

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible Alternative 3.

#### **4. Alternative 4: Baldwin Hills Alternative Site**

##### **Description**

Under Alternative 4, the Project would be developed at the site of the existing Baldwin Hills Crenshaw Plaza shopping mall, located approximately 4.5 miles north of the Project Site in the Baldwin Hills neighborhood of the City of Los Angeles (see Figure 6 3). The focus of this alternative is to identify the impacts that would occur if the arena and related development were to be constructed and operated at another site that is located, if not within the City of Inglewood, then in the same general vicinity within the region, but not as proximate to The Forum and the NFL Stadium, as a means of avoiding or lessening the traffic and related impacts of concurrent events at these facilities. Because the vicinity around Inglewood is largely developed, available sites that may meet these criteria and be of sufficient size to accommodate the arena and other project elements are limited. The City determined that there is such a site located in the vicinity of Baldwin Hills neighborhood.

The Baldwin Hills Crenshaw Plaza shopping mall is approximately 43 acres in size and is bounded by West 39th Street on the north, Crenshaw Boulevard on the east, Stocker Street on the southeast, Santa Rosalia Drive on the southwest, and Marlon Avenue on the west. The mall is also bisected into two parcels by Martin Luther King Jr. (MLK) Boulevard: a northern parcel consisting of approximately 11 acres and a southern parcel consisting of 32 acres. The Baldwin Hills Alternative site is located on a large portion of the 32-acre southern parcel of the mall.

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Under existing conditions, the Baldwin Hills Alternative site includes approximately 791,650 square feet of commercial retail, restaurant, and entertainment uses. These uses include anchor stores such as Sears; mall stores; restaurants; a theater; a bank; and two parking structures. The existing Cinemark Theaters and mall stores on the site would remain. All other uses, including the Sears store and automotive center would be demolished and cleared for construction of the Alternative 4 uses. None of the uses on the northern parcel would be disrupted, and the viaduct that crosses West Martin Luther King Jr. Boulevard would remain.

In general, regional highway facilities are located further from the Baldwin Hills Alternative Site than the regional highway facilities that serve the Project Site. Regional access to the Baldwin Hills Alternative site is provided by the Santa Monica Freeway (I-10), located approximately 1.6 miles to the north, the Harbor Freeway (I-110), located about 3.1 miles to the east, and the San Diego Freeway (I-405), located approximately 3.5 miles to the west. Local access to the Baldwin Hills Alternative site is provided by Crenshaw Boulevard and West Martin Luther King Jr. Boulevard. The Baldwin Hills Alternative site is also accessible by transit via bus and the future Crenshaw/LAX light rail line. The closest bus stop to the Baldwin Hills Alternative site will be located immediately adjacent to the site, at the intersection of Crenshaw Boulevard and MLK Boulevard, while the nearest light rail station is located immediately adjacent to the site along the west side of Crenshaw Boulevard, south of MLK Boulevard.

The Baldwin Hills Alternative site is located adjacent to the Crenshaw Commercial Corridor and is mostly surrounded by commercial uses with low and medium density residential uses located to the southwest, south, and east. Land uses to the north consist of retail uses located across MLK Boulevard on the mall's 11-acre northern parcel while land uses to the east include single-story commercial uses and associated parking. To the east, along Crenshaw Boulevard between West MLK Jr. Boulevard and West Stocker Street, land uses are commercial for one parcel deep, and then single family residential further east. Land uses to the southeast across Stocker Street include single-story commercial uses, two-story multifamily uses, and one-story single-family residential uses. Land uses to the southwest along Santa Rosalia Drive include various mid-rise residential and office uses including a four-story medical office building, six-story condominium building, a church and preparatory academy, and a community recreational facility (YMCA). Land uses to the west along Marlton Avenue include a large three-story Kaiser Permanente medical office building surrounded by parking.

The Baldwin Hills Alternative Site is designated Regional Commercial Center, and is located in the West Adams-Baldwin Hills-Leimert Community Plan area. Land uses surrounding the Baldwin Hills Alternative site within the City of Los Angeles are designated by the West Adams-Baldwin Hills-Leimert Community Plan as Regional Commercial Center to the north, Community Commercial and Neighborhood Commercial to the east, Community Commercial to the southeast, and Regional Center Commercial to the west. With respect to zoning, the Baldwin Hills Alternative site is designated Commercial (C2). Land uses surrounding the Baldwin Hills alternative site within the City of Los Angeles are zoned as Commercial (C2) to the north; Limited Commercial (C1) to the east; Commercial (C2) to the southwest; and Commercial (C2) to the west. Land uses within unincorporated Los Angeles County to the southeast are zoned Multiple Dwelling Unit Residential (R3).

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A plan to modernize and redevelop the existing Baldwin Hills Crenshaw Plaza shopping mall was approved by the City of Los Angeles in 2018. The plan calls for the demolition of approximately 13,400 square feet of retail/restaurant space and the construction of about 44,200 square feet of retail/restaurant space, a 400-room hotel, and 410 apartment units on the Baldwin Hills Alternative site; the existing mall buildings and theater would remain. The project has yet to be developed.

Alternative 4 would involve the demolition of the Sears store, the east parking structure along Crenshaw Boulevard, and smaller commercial and retail outbuildings along Stocker Street, Santa Rosalia Drive, and Marlton Avenue. The former Walmart store at the corner of Crenshaw Boulevard and West MLK Jr. Boulevard, the main mall structure (including bridge structure), and Cinemark movie theater would remain. In addition, the west parking structure along Marlton Avenue would either be expanded or replaced under this alternative.

Similar to the Project, the arena under Alternative 4 would have a capacity of 18,000 attendees in an NBA basketball configuration, and up to 18,500 in certain concert configurations. In addition, a team practice facility, sports medical clinic, team offices, and retail uses would be included under this alternative. The square footage of each of these uses would remain the same as under the Project. This alternative would not include a hotel or a new potable water well because such uses would not be removed in order to accommodate the Arena Structure. Approximately 4,060 on-site parking spaces would be provided in two parking structures, slightly less than the 4,125 on-site parking spaces that would be provided in the Project. On-site parking would be provided in the expanded or new four-level 2,100-space Parking Structure A that would be accessed from Marlton Avenue and a new four-level, 1,960-space Parking Structure B would be constructed along Stocker Street.

### **Relationship to Project Objectives**

The City of Inglewood's basic objectives for the Project involve economic development, revitalization, and enhancing the welfare of the City and its residents, transforming underutilized property in the City, enhancing the identity of the City, and creating jobs in Inglewood. Because the Baldwin Hills Alternative Site is located in the City of Los Angeles and not in the City of Inglewood, none of the City of Inglewood's objectives for the Project would be met under Alternative 4. Notably, the City of Inglewood has long-standing goals articulated in the General Plan Land Use Element which call for the promotion of economic development that would generate opportunities and employment for the City's residents. Contrary to these goals, Alternative 4 would eliminate all increases in revenues to the City and the Inglewood Unified School District. Alternative 4 would also be inconsistent with the City's objective to "transform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City." As discussed above under Alternative 1, the intent of the AIP program is that the land in question acquired by the City and Successor Agency be cleared of incompatible uses, and that the grant recipients use their best efforts to dispose of the land at fair market value for development with airport compatible uses. Under Alternative 4, the proposed Project Site would not be developed as under the Proposed Project. (ESA Alternatives Memo, p. 16.)

The Baldwin Hills Alternative Site would meet most but not all of the project applicant's objectives for the project. Because the Baldwin Hills Alternative site would first require acquiring the site, and then designing and approving the project through the City of Los Angeles, it is uncertain if this alternative site would allow the applicant to begin hosting LA Clippers home games in the 2024–2025 season, and thus could be unable to meet project applicant Objective 1a. While a state-of-the-art multi-purpose basketball and entertainment center (project applicant Objective 1a) along with team facilities (project applicant Objective 1c) and retail uses (project applicant Objective 1e) would be constructed under the Baldwin Hills Alternative, it would not combine with the future NFL Stadium to create a dynamic, year-round sports and entertainment district destination in the southwestern portion of Inglewood (project applicant Objective 3a).

### **Comparative Impacts**

Table 6-2 at the end of Chapter 6.0, Alternatives, of the EIR has an impact-by-impact comparison of the significant impacts of the Project and Alternative 4. The comparative analysis of environmental effects provided below was informed by the 2016 Baldwin Hills Crenshaw Plaza Master Plan Project EIR (Master Plan EIR),<sup>17</sup> that contained information relating to existing conditions in and around the Baldwin Hills Alternative Site, and the environmental impacts of redevelopment of the site.

### ***Impacts Identified as Being the Same or Similar to the Project***

Because the size of the arena and the amount of development would be essentially the same as the development in the Project, many of the impacts of the Project that are affected by the intensity of development would remain the same or very similar at the Baldwin Hills Alternative Site.

### **Aesthetics**

The aesthetic conditions around the Baldwin Hills Alternative site are different in specifics than at the Project Site, but similar in character. The site is adjacent to a major commercial corridor, in this case Crenshaw Boulevard, with other commercial lined streets backed by residential neighborhoods on several sides. Long range views are of urbanized Los Angeles, and while the proposed arena and associated uses at this site would be clearly identifiable, the aesthetic change of the site from a regional shopping mall with major parking resources to an arena with parking resources would not be material (Impact 3.1-1). Most of the immediately adjacent uses that would be potentially affected by shadows created by the larger structures are commercial in nature, and given the 4-story profile of the perimeter parking structures, it is unlikely that significant shadow impacts would affect nearby residential uses (Impact 3.1-3).

Although they would affect light sensitive receptors at a different location, the spillover lighting effects of Alternative 4 would be of similar magnitude as those of the Project. Adjacent to the Baldwin Hills Alternative site there are light sensitive residences across Stocker Street and Santa Rosalia Drive. Illuminated signage on retail buildings and parking structures, plaza lighting, and arena façade lighting could spillover these streets and result in light in excess of City of Los Angeles standards on residential

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<sup>17</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. 17077.001 4847-6266-0032.1

properties. While many of these current light sensitive receptors are in proximity to the existing Baldwin Hills mall uses, the increased height, signage, and area lighting from the proposed type of development could exacerbate existing light levels and create significant impacts (Impacts 3.1-2 and 3.1-5). Like the Project, Alternative 4 would require implementation of Mitigation Measure 3.1-2(a) and (b).

### **Biological Resources**

A number of trees are located on and/or adjacent to the Baldwin Hills Alternative site so it is likely that tree loss or other construction activities that would occur with Alternative 4 could disturb nesting raptors or migratory birds (Impact 3.3-2). Mitigation Measure 3.3-2 would reduce these impacts by requiring that steps be taken to protect this resource during construction. As a result, impacts to nesting raptors or migratory birds would be similar to the Project.

### **Geology and Soils**

Impacts of the Baldwin Hills Alternative Site related to geology and soils conditions and hazards, including paleontological resources would be similar to those described for the Project. Because Alternative 4 would occur approximately 4.5 miles north of the Project Site, the geological and soils conditions that would be encountered in construction of Alternative 3 would be similar to those with the Project. Because the amount of ground-disturbing activity under Alternative 4 would be essentially the same as with the Project, the potential for erosion and accidental discovery of paleontological resources would be correspondingly similar (Impacts 3.6-2 and 3.6-4). These impacts would continue to be potentially significant under Alternative 4 and would require the same mitigation measures as identified for the Project in order to reduce the impact to less than significant.

### **Hazards and Hazardous Materials**

Past soil contamination on the Baldwin Hills Alternative site has either been remediated or does not pose a concern to individuals and/or the environment.<sup>18</sup> However, it is possible that previously contaminated soils may still remain on the Baldwin Hills Alternative site, and thus, as with the Project, construction workers could be exposed to contamination during ground disturbing activities (Impact 3.8-4). Mitigation Measure 3.8-4 would require the preparation and approval of the Soil Management Plan prior to initiating earthwork activities, which would reduce the potential for worker exposures. For this reason, impacts related to on-site contamination would be similar to the Project.

### **Hydrology and Water Quality**

The Baldwin Hills Alternative site is fully developed with impervious surfaces; pervious surfaces on the site are minimal and include ornamental landscaping. Surface water runoff from the Baldwin Hills Alternative site is directed into an extensive storm drain collection system that serves the area. Similar to the Project, it is possible that construction and operation of Alternative 4 could degrade the quality of the water that is discharged from the Baldwin Hills Alternative site (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4). In addition, as with the Project, altered drainage patterns on the Baldwin Hills Alternative site during both

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<sup>18</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.F-10.

construction and operation have the potential to result in erosion, sedimentation, and/or flooding on or off site by redirecting or concentrating flows (Impact 3.9-3 and 3.9-6). Mitigation Measure 3.9-1(a) would require the project at the Baldwin Hills Alternative site to comply with a number of regulations governing water quality and drainage while Mitigation Measure 3.9-1(b) would require the periodic sweeping of parking lots during operation to remove contaminants. As a result, impacts related to water quality and drainage would be similar to those described for the Project.

### **Land Use and Planning**

Like the Project, Alternative 4 would not result in the division of an established community, as the arena and other uses would be located entirely within the southern parcel of the Baldwin Hills-Crenshaw Plaza mall; the vacation of streets would not be required. Alternative 4 would likely require an amendment to West Adams-Baldwin Hills-Leimert Community Plan. With the amendment, Alternative 4 would be consistent with plans or policies that have been adopted for the purposes of environmental mitigation, and thus it would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

### **Noise and Vibration**

Construction vibration levels under Alternative 4 would be similar to the Project due to the use of similar amounts of equipment and construction methods. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-6) would be the same and would still require the implementation of Mitigation Measures 3.11-3(a) through (c), which requires minimum distances of construction equipment from sensitive receptors and the designation of a construction relations officer to field vibration-related complaints.

Like the Project (Impacts 3.11-4 and 3.11-8), Alternative 4 would not expose people residing or working within the Baldwin Hills Alternative site to excessive noise levels from aircraft as the site is not located within 2 miles of a public airport or public use airport.

### **Population, Employment and Housing**

According to the Master Plan EIR, development under the Baldwin Hills Crenshaw Plaza Master Plan would result in a net increase of 1,760 employees on the site. However, these new jobs would be accommodated by unemployed workers in the area.<sup>19</sup> Similar to the Project, Alternative 4 would add 768 non-event employees to the Baldwin Hills Alternative site, which is less than half the number that would be added under the Master Plan. As a result, these new jobs would also be accommodated by unemployed workers in the area. In addition, as no housing is located on the Baldwin Hills Alternative site, Alternative 4 would not result in the displacement of substantial numbers of people or housing. For these reasons, impacts related to population, employment, and housing (Impacts 3.12-1 through 3.12-4) under Alternative 4 would be similar in magnitude to the Project.

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<sup>19</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.J-11.

## Public Services

Fire protection services at the Baldwin Hills Alternative site is provided by the City of Los Angeles Fire Department (LAFD) and police protection services are provided by the Los Angeles Police Department (LAPD). There are multiple fire stations that provide service to the project site, including Station Nos. 94, 34, and 66, which the LAFD has indicated that the response times and distances to the Project Site from Station 94 and Station 34 currently meet LAFD standards.<sup>20</sup> The Baldwin Hills Alternative Site is located within the LAPD's South Bureau, and is served by the Southwest Community Police Station, located at 1546 West Martin Luther King Jr. Boulevard.<sup>21</sup> With the implementation of a series of Regulatory Compliance Measures and Project Design Features required of new projects in the City of Los Angeles, the Project built and operated at the Baldwin Hills Alternative site would have a less than significant impact on the provision of fire and police protection services (Impacts 3.13-1 through 3.13-4). This impact would be similar in magnitude to the impact at the Project Site.

Because the Project does not include residential uses, it would not adversely affect City of Los Angeles parks and recreation facilities or Los Angeles Unified School District elementary, middle, and high schools (Impacts 3.13-5 through 3.13-12). Thus, these impacts would be the same as with the Project.

## Transportation and Circulation

Under Alternative 4, the ability to walk to the Crenshaw/LAX light rail line Martin Luther King Jr. Station without the need for shuttling would increase the attractiveness of rail transit, although this effect could be partially offset since only one rail line would be thus accessible. The removal of a portion of the retail uses at Baldwin Hills Crenshaw Plaza shopping mall to accommodate the Project at the Baldwin Hills Alternative site would reduce the net vehicle trip increase generated by the project at this site. Although the net new trips generated by major events at the arena would be reduced somewhat, a substantial reduction in the level of intersection, neighborhood street, or freeway facility impacts would not be expected (Impacts 3.14-1 through 3.14-9, Impacts 3.14-16 through 3.14-24, Impacts 3.14-28 and 3.14-39, and Impacts 3.14-33 and 3.14-34).

In general, regional highway facilities are located further from the Baldwin Hills Alternative site than the regional highway facilities that serve the Project site. Regional access to the Baldwin Hills Alternative site is provided by the I-10 freeway, located approximately 1.6 miles to the north, the I-110 freeway, located about 3.1 miles to the east, and the I-405 freeway, located approximately 3.5 miles to the west. Local access to the Baldwin Hills Alternative site is provided by Crenshaw Boulevard and Martin Luther King Jr. Boulevard, both of which are designated as Avenue I arterial streets in the City of Los Angeles

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<sup>20</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.K.1-2.

<sup>21</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.K.2-2.

*Mobility Plan 2035*, and Stocker Street, a Boulevard II arterial street in the *Mobility Plan 2035*.<sup>22</sup> Each of the streets bordering the Baldwin Hills Alternative site provide multiple traffic lanes.

Similar to the Project, Alternative 4 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic (Impacts 3.14-11, 3.14-25, 3.14-30, and 3.14-35).

Pedestrian impacts could be similar since not all parking would be provided on the Baldwin Hills Alternative site and pedestrians could be crossing arterial streets to access off-site parking (Impact 3.14-13).

Construction impacts on traffic were determined to be significant for the Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the Project at the Alternative 4 site would likely involve temporary lane closures along the Stocker Street frontage of the site for construction of a parking garage. Therefore, construction impacts for Alternative 4 would be in a different location but could be similar in magnitude to those for the Project.

#### **Utilities and Service Systems**

Similar to the Project, Alternative 4 would demand approximately 103 acre-feet per year (AFY) with the implementation of baseline water conservation measures and about 63 AFY with LEED Gold certification. Water service to the Baldwin Hills Alternative site is provided by the Los Angeles Department of Water and Power (LADWP). In accordance with the requirements of Senate Bill 610 and California Water Code section 10912(a), LADWP, as the designated water supplier, prepared a Water Supply Assessment (WSA) for development proposed under the Baldwin Hills Crenshaw Plaza Master Plan. The WSA concluded that the anticipated additional 332.5 AFY of annual water demand under the Master Plan falls within the City's projected water supplies for normal, single-dry, and multiple-dry years through the year 2030 and falls within the City's 25-year water demand growth projection.<sup>23</sup> As Alternative 4 would demand substantially less water than the Baldwin Hills Crenshaw Plaza Master Plan, LADWP would also have sufficient supply to serve development under Alternative 4. This impact would be the same as the Project.

In addition, like with the Project, the existing storm drain system in the vicinity of the Baldwin Hills Alternative site may have insufficient capacity to accommodate post-construction stormwater runoff from the Alternative 4 development (Impacts 3.15-9 and 3.15-10). Mitigation Measures 3.15-9 and 3.15-10 would require the project to comply with a number of regulations governing water quality and drainage (Mitigation Measure 3.9-1(a)). As a result, impacts related to stormwater capacity would be similar to those described for the Project.

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<sup>22</sup> City of Los Angeles, *Mobility Plan 2035, An Element of the General Plan*, Adopted January 2016.

<sup>23</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. pp. IV.M.2-11 to IV.M.2-12.

### ***Impacts Identified as Being Less Severe than the Project***

#### **Air Quality and GHG Emissions**

Air Quality and GHG emissions during construction and operation under Alternative 4 would be similar to the Project but slightly lessened as this alternative would not include the planned hotel on the East Transportation Site or a new potable water well. Therefore, similar to the Project, Alternative 4 would conflict with implementation of the applicable air quality plans, as operational emissions associated with the alternative, though somewhat reduced, would still exceed thresholds established by the SCAQMD for criteria air pollutants (Impacts 3.2-1 and 3.2-5).

Impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6), localized maximum daily operational emissions (NO<sub>2</sub>) (Impacts 3.2-3 and 3.2-7), and GHG emissions (Impact 3.7-1 and 3.7-2) would be slightly reduced, but would still require the implementation of Mitigation Measure 3.2-2(a), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)), Mitigation Measure 3.2-2(b), which would require the testing of the emergency generators and fire pump generators on non-event days, Mitigation Measure 3.2-2(c), which would require preparation and implementation of a Construction Emissions Minimization Plan, Mitigation Measure 3.2-2(d), which would require the project applicant to encourage the use of zero- and near-zero emissions vendor and delivery trucks, Mitigation Measure 3.7-1(a), which would require the implementation of a GHG reduction plan, and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the project below the no net new GHG emissions threshold of significance.

#### **Biological Resources**

None of the trees listed in the City of Los Angeles Protective Tree Ordinance occur on the Baldwin Hills Alternative site.<sup>24</sup> As a result, Alternative 4 would not result in the loss of protected trees (3.3-3). Mitigation Measure 3.3-3 to reduce this impact would not be required. As a result, impacts to protected trees would be avoided under this alternative.

#### **Energy Demand and Conservation**

Energy demand during construction and operation under Alternative 4 would be similar to the Project but slightly lessened as this alternative would not include the planned hotel on the East Transportation Site or a new potable water well (Impacts 3.5-2 and 3.5-4.)

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

Alternative 4 would not result in an air navigation hazard as the Baldwin Hills Alternative site is not located within an airport land use area plan. For this reason, hazards impacts associated with air navigation (Impact 3.8-5) would be avoided under this alternative and Mitigation Measure 3.8-5 would not be required.

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<sup>24</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. Appendix A, Initial Study, p. 5.

## Transportation and Circulation

The removal of a portion of the existing retail uses at Baldwin Hills Crenshaw Plaza shopping mall to accommodate the Project at the Baldwin Hills Alternative site would reduce the net vehicle trip increase generated by the project at this site. Net new trips generated by the ancillary uses would be reduced to the extent that intersection and street impacts are unlikely for the ancillary uses (Impacts 3.14-1, 3.14-4, 3.14-16, and 3.14-19). Net new trips generated by daytime events uses would be reduced because of both the removal of a portion of the existing uses and the ability to walk to rail transit, reducing intersection, neighborhood street, and freeway facility impacts for daytime events (Impacts 3.14-2, 3.14-5, 3.14-8, 3.14-17, 3.14-20, and 3.14-23).

Average trip lengths for attendees of events at the Baldwin Hills Alternative site would likely be shorter than those for events at the Project given the site's location closer to the regional center, reducing the significant VMT impacts identified for events at the Project, but not to a level that is less than significant. The elimination of the hotel use would avoid the significant VMT impact identified for the Project's hotel use (Impact 3.14-10).

The nearest emergency rooms to the Alternative 4 site are located at the Kaiser Permanente West Los Angeles Medical Center, approximately 2.7 miles from the site, and the Southern California at Culver City, approximately 3.3 miles from the site. Given the distance from the site, impacts on emergency access would not be expected to be significant, and would not require mitigation.

Given that the location of the Baldwin Hills Alternative site is over 3 miles from The Forum and the NFL Stadium, the level of additional project-related impact on intersections, neighborhood streets, freeway facilities, and public transit during concurrent events at The Forum and/or the NFL Stadium would be substantially reduced from that for the Project during concurrent events (Impacts 3.14-28 and 3.14-29, Impact 3.14-30, Impacts 3.14-33 through 3.14-35).

### ***Impacts Identified as Being More Severe than the Project***

#### **Cultural Resources**

According to Master Plan EIR, two known archaeological sites are located on the Baldwin Hills Alternative site. Archaeological site survey records indicate the presence of archaeological burial remains and artifacts including abalone shells, mollusk shells, chipped stone points, and other unidentified material that were identified and recorded in 1946 during construction of the Broadway Building on the northern mall parcel and again in 1951 during excavation for the basement store.<sup>25</sup> In addition, the younger quaternary alluvium deposits underneath the Baldwin Hills Alternative site typically do not

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<sup>25</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.D.2-9.



contain significant fossil vertebrate remains; however, older, deeper deposits underneath the site may contain significant vertebrate fossils.<sup>26</sup>

For these reasons, similar to the Project Site, it is possible that the Baldwin Hills Alternative site may contain unknown historical, archaeological, or tribal cultural resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-5, 3.4-6, and 3.4-7), and/or unknown human remains (Impacts 3.4-4 and 3.4-8). As noted above, the Master Plan EIR identified that there are two known archaeological sites within the Project Site, and City of Los Angeles Historic-Cultural Monument No. 487 (Sanchez Ranch) is located within 500 feet of the Project Site. Both archaeological resource sites 19-000080 and 19-001336, and City of Los Angeles Cultural Monument No. 487, have recorded the existence of Native American burial remains and other artifacts including abalone shells, mollusk shells, and chipped stone points. Due to the proximate location of the proposed grading areas and these sites, potential to disturb other undiscovered Native American remains that may exist beneath the Project Site is considered moderate to high. Because of the potential for accidental discovery of such resources occur during construction, this impact would be potentially significant and considered more severe than that described for the Project.

Mitigation Measures 3.4-1 and 3.4-4 would reduce these impacts by requiring that work stop if such resources are uncovered, and that the resources be appropriately evaluated and treated. Nevertheless, because of the known presence of Native American archaeological resources, including human remains and burial artifacts on and near the Baldwin Hills Alternative Site, impacts on archaeological resources, and human remains would be more severe than for the Project.

### Noise and Vibration

Ambient noise levels at locations around the Baldwin Hills Alternative site are similar, but somewhat lower than those in the vicinity of the Project Site. Noise levels along perimeter streets range from about 61 to 69 dBA Leq at the Baldwin Hills Alternative site,<sup>27</sup> compared to a range of approximately 64 to 71 dBA Leq at the Project Site (see Table 3.11-1). While traffic noise generators are similar in character, the Baldwin Hills Alternative site area lacks proximity to aircraft noise as is the case at the Project Site.

Noise levels ~~and~~ generated by construction and operation of Alternative 4 would be similar to the Project and sensitive receptors along Stocker Street to the south, across Crenshaw Boulevard to the east, across Santa Rosalia Drive to the west-southwest, and across West MLK Jr. Boulevard to the northwest of the Baldwin Hills Alternative site would be subjected to the same noise levels as sensitive receptors near the Project Site during construction and operation; these receptors would be located similar distances as sensitive receptors near the Project Site from construction activity, nearby roadways, and arena plaza activities. Therefore, while temporary increases in noise during construction and permanent increases in noise during operation (Impacts 3.11-1, 3.11-2, 3.11-5, and 3.11-6) would be of similar magnitude, the fact that the Baldwin Hills Alternative site area is generally quieter than the Project Site vicinity would

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<sup>26</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.D.2-6.

<sup>27</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. Table IV.I-3, p. IV.I-7.

result in more severe impacts with Alternative 4 than under the Project. Development under Alternative 4 would still be required to implement Mitigation Measure 3.11-1, which requires the implementation of measures and controls to reduce noise during construction, Mitigation Measure 3.11-2(a), which would require the preparation of an operations noise reduction plan, and Mitigation Measure 3.11-2(b), which requires the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)).

### **Transportation and Circulation**

The amount of on-site parking under Alternative 4 would be similar to that for the Project, meaning that a substantial amount of parking (roughly 3,700 to 4,100 spaces for a major event) would still need to be provided off site. Some could potentially be accommodated in the evenings in the parking lot for the medical office building across Marlton Avenue to the northwest or in other small lots in the area. However, this is likely to be insufficient, and event spillover parking onto nearby residential streets could be a significant impact.

Three of the streets surrounding the Alternative 4 site are identified in the City of Los Angeles *Mobility Plan 2035* for future bicycle improvements: Crenshaw Boulevard is on the Bicycle Lane Network identified for Tier 2 Bicycle Lanes, Martin Luther King, Jr. Boulevard is on the Bicycle Enhanced Network identified for Tier 1 Protected Bicycle Lanes, and Santa Rosalia Drive is on the Neighborhood Enhanced Network. As such, depending on the location of parking access and shuttle bus pull-outs, construction and operation of the Project could adversely affect planned bicycle facilities. Strategic placement of Traffic Control Officers could potentially mitigate any such impacts.

### **Utilities and Service Systems**

At the Project Site, wastewater flows could be accommodated with several limited off-site improvements to increase capacity in local lines. At the Baldwin Hills Alternative site, the 12-inch sewer line under Marlton Avenue has a remaining flow capacity of 0.28 MGD; the capacity of the sewer under Crenshaw Boulevard is unknown.<sup>28</sup> The estimated peak wastewater flow from the Project development would be approximately 0.70 MGD, more than double the known capacity of lines serving the site. Thus, infrastructure upgrades would be needed to allow the local wastewater infrastructure adjacent to the Project Site to serve the Project at the Baldwin Hills Alternative site. The construction of these infrastructure improvements could cause noise, traffic disruption, and other environmental effects associated with sewer line upgrades. This impact would be more severe than at the Project Site.

### **Basis for Finding**

Alternative 4 (Baldwin Hills Alternative Site) would avoid or lessen some impacts associated with the Project; however, this alternative would also increase impacts to cultural resources, noise and vibration, transportation and circulation, and utilities and service systems. Because the Project would be located

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<sup>28</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. Table IV.I-3, p. IV.M.1-11.

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within the City of Los Angeles, none of the City of Inglewood’s objectives for the Project would be met under Alternative 4. For example, the City would be unable to achieve its goals of promoting the City as a premier regional sports and entertainment center (City Objective 1), enhancing the City’s general economic health by stimulating new business and economic activity (City Objective 2), and constructing (with private funds) a public assembly space that would host sporting, cultural, business, and community events (City Objective 8). Alternative 4 would be inconsistent with the City’s objective to “transform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City.” Alternative 4 would also fail to provide any of the community benefits to be provided by the project applicant pursuant to the Development Agreement. (See ESA Alternatives Memo, p. 17.)

Additionally, the project applicant’s objectives related to hosting LA Clippers home games in the 2024–2025 season, and creating a dynamic, year-round sports and entertainment district destination in the southwestern portion of Inglewood would not be met under this alternative. The proposed arena and associated development would require a complete redesign, including necessary NBA review and approval, along with review and approval through the City of Los Angeles, including preparation of a new CEQA document. The need to restart the planning and entitlement process would result in schedule extensions that would obstruct the ability to meet the project applicant’s schedule objective to open in time for the 2024-2025 NBA season. It is also uncertain whether the City of Los Angeles would approve the construction of the Project on the site, whether the Baldwin Hills Alternative site is available for purchase, or whether use of the Baldwin Site for the Project is feasible in light of traffic constraints and the proximity of existing and future retail use and nearby residential neighborhoods. (ESA Alternatives Memo, pp. 14-15.)

As with Alternative 3, the Alternative 4 site also does not meet the definition of “project area” included in Public Resources Code section 21168.6.8(a)(5). Thus, Alternative 4 would not meet the requirements for compliance with AB 987. Due to this change, should the adequacy of the EIR be litigated, rather than the AB 987 dictated 270-day process for legal proceedings, including any potential appeals, the project would be subject to the established legal process which can take three or more years. This more extended legal process would likely obstruct the ability to meet the applicant’s schedule objective to open in time for the 2024-2025 NBA season. In addition, because AB 987 would not apply at this site, there would be as a loss of environmental benefits, as the measures the project applicant has committed to in the Greenhouse Gas Reduction Plan would not be implemented under Alternative 4. (ESA Alternatives Memo, p. 17.) In addition, the City would receive none of the substantial community benefits incorporated into the Development Agreement for the Project. (ESA Alternatives Memo, p. 17.)

As set forth in the ESA Alternatives Memo, this alternative is considered infeasible for the following, additional reasons:

- It is uncertain whether the City of Los Angeles would consider an alternative plan for the site, given recent planning efforts approved for the site.

- It is unknown if the Baldwin Hills Alternative site is available for purchase, or if the owner of the site would be willing to sell to the project applicant. In addition, the plan to modernize and redevelop the site is currently subject to ongoing litigation, which could constrain the ability of the project applicant to purchase the property before the litigation is resolved.
- Due to the setting and configuration of the site, Alternative 4 would create a significant parking, traffic, and operational challenges that could result in adverse effects to the existing and remaining businesses, or result in spillover effects in nearby neighborhoods
- Traffic generated under Alternative 4 would have to travel farther to and from regional highway facilities, resulting in more potential affected intersections that could be adversely affected along roadways leading to the Baldwin Hills Alternative site.

The City Council rejects Alternative 4 (Baldwin Hills Alternative Site) on each of these grounds independently. All of the reasons provide sufficient independent grounds for rejecting this alternative.

#### **Finding**

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible Alternative 4.

### **5. Alternative 5: The District at South Bay Alternative Site**

#### **Description**

Under Alternative 5, the Project would be developed at a site in the City of Carson approximately 8 miles southeast of the Project Site (see Figure 6 4). The focus of this alternative is to identify the impacts that would occur if the arena and related development are located at another site that is, if not proximate to the City, then at a site that has previously been considered for a sports and entertainment facility. The City has determined that there is such a site located in the City of Carson. One key aim of this alternative is to determine whether such a site exists that

would locate the arena at a site that is not as proximate to The Forum and the NFL stadium, as a means of avoiding or lessening the traffic and related impacts of concurrent events at these facilities. The City has determined that Alternative 5 may meet these criteria. There is some question regarding whether this site would meet the project applicant's objective to "[l]ocate a basketball and entertainment center on a site that is geographically desirable and accessible to the LA Clippers' current and anticipated fan base." Based on available information, however, this alternative appears to be potentially feasible.

Specifically, the Project would be located on a portion of a 157-acre site known as The District at South Bay, located west of the San Diego Freeway (I-405) and south of Del Amo Boulevard. The site is a former Class II landfill that is currently undergoing remediation and closure. The site is mostly vacant and

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is covered with nonnative grasses with the exception of the eastern portion of the site adjacent to the I-405, where a 711,500-square-foot regional commercial center is presently being constructed. Other existing facilities on the site include groundwater and landfill gas treatment facilities, and subsurface facilities to assist with dispersion of landfill gases. Construction trailers and equipment are also located in the northwestern portion of the site; soil and material stockpiles and construction materials are stored in various locations on the site.

Regional access to the site would be provided by the San Diego Freeway (I-405), immediately adjacent to the east, Harbor Freeway (I-110 Freeway), approximately 0.5 miles to the west, Artesia Freeway (SR-91 Freeway), about 1.9 miles to the north, and Long Beach Freeway (I-710 Freeway), approximately 3.4 miles to the east. Overall, these regional highway facilities are located closer to the Alternative 5 site than the regional highway facilities that serve the Project. Local access to the site is provided by Del Amo Boulevard, Avalon Boulevard, and Main Street. Transit at the Alternative 5 site includes bus service provided by the City of Carson's bus system, Carson Circuit, which provides connections to the Metro Blue Line and regional bus services from Torrance Transit, the MTA, Long Beach Transit and Gardena Municipal Bus Lines. The nearest bus stop is located at the intersection of Del Amo Boulevard and Main Street, located adjacent to the northwest corner of the project site, and multiple bus lines running north-south along Avalon Boulevard. The nearest light rail station is the Metro Blue Line station at Del Amo Boulevard, about 3.5 miles east of the site.

The Alternative 5 site is surrounded by multiple land uses. Uses to the east across the I-405 include residential neighborhoods and regional retail, most notably the South Bay Pavilion at Carson. To the north of the site is the Porsche Experience Center, a 6.5-kilometre test and development auto racetrack, a racing car exhibition, and a restaurant. To the northeast is the Victoria Golf Course. Residential areas, consisting of one- and two-story detached residences and manufactured homes, are located to the south and west. The residences are separated from the Alternative 5 site by the Torrance Lateral Flood Control Channel (Torrance Lateral), a concrete-lined drainage channel which parallels the southern and western border of the site. To the west of the site, extending away from the site on West Torrance Boulevard and Del Amo Boulevard, are low-rise commercial and light industrial uses.

The site is designated Mixed Use – Residential in the City of Carson General Plan and designated Mixed-Use Marketplace (MU-M) and Commercial Marketplace (CM) in The District at South Bay Specific Plan. Land uses surrounding the project site are designated by the City of Carson General Plan as Mixed Use – Residential and Mixed Use – Business Park to the north, Regional Commercial to the east, Low Density Residential and High Density Residential to the south, and Low Density Residential to the west. With respect to zoning, land uses surrounding the project site are zoned regional commercial to the north and east, and single-family and multi-family residential to the south and west.

In 2006, the City of Carson adopted the Carson Marketplace Specific Plan, which proposed constructing a 1,995,125-sf mixed-use commercial project (retail, 300 hotel rooms, and entertainment uses) and 1,550 residential units. In 2011, the specific plan was amended and renamed "The Boulevards at South Bay Specific Plan." In 2015, the specific plan area was proposed for the development of an NFL Stadium that would have served as the home for the San Diego Chargers and Oakland Raiders franchises. Ultimately

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this site was not selected, and the Chargers relocated to Los Angeles with the intent to play games at the new NFL Stadium under construction in Inglewood, and the Raiders decided to relocate to a new stadium currently under development in Las Vegas.

In 2018, the specific plan was further amended to allow for regional commercial uses and renamed “The District at South Bay Specific Plan.” Under the current proposal, the 157-acre site would be developed with a total of 1,250 residential units and 1,834,833 square feet of commercial uses including approximately 711,500 square feet of regional commercial uses, including outlet and restaurant uses, and 890,000 square feet of regional retail center, neighborhood-serving commercial, restaurant, and commercial recreation/entertainment uses, as well as 350 rooms total in two hotels. As discussed above, the 711,500-square-foot regional commercial center (Los Angeles Premium Outlets) is under construction on the approximately 30-acre eastern portion of the specific plan area, adjacent to the I-405.

As with the Project, the Alternative 5 arena would have a capacity of 18,000 attendees in an NBA basketball configuration, and up to 18,500 in certain concert configurations. In addition, this alternative would include a team practice facility, sports medical clinic, team offices, and retail uses. The square footage of each of these uses would remain the same as under the Project. Approximately 8,000 surface parking spaces would be provided on the site; no parking structures would be constructed. The amount of parking is almost twice as much parking as is provided by the Project, and would respond to the relative lack of access to transit (3.5 miles to the Metro Blue Line Del Amo Station) and lack of substantial parking resources in the vicinity of the Alternative 5 site.

The design of the arena would change in response to the conditions on the District at South Bay Alternative site. Investigation of and planning for remediation of the former landfill started in the late 1970s, and continued for about 40 years. The DTSC Remedial Action Plan for the former landfill requires the creation of an impervious cap underlain by clean fill. Thus, in order to avoid substantial changes to those earlier plans that would be associated with substantial excavation, instead of excavating to a depth of up to 35 feet and removing approximately 376,000 cubic yards of earth and former landfill materials from the site to accommodate the arena bowl, under Alternative 5, the arena would be constructed on a pad that would require the import of a similar amount of soil in order to build up the land area around the arena to avoid disturbing the buried landfill materials on the site.

This alternative would not include a hotel or a new municipal water well.

### **Relationship to Project Objectives**

The City of Inglewood’s basic objectives for the Project involve economic development, revitalization, and enhancing the welfare of the City and its residents, transforming underutilized property in the City, enhancing the identity of the City, and creating jobs in Inglewood. Because the District at South Bay Alternative is located in the City of Carson and not in the City of Inglewood, none of the City of Inglewood’s objectives for the project would be met under Alternative 5. The District at South Bay Alternative would eliminate all community benefits and increases in revenues to the City and the Inglewood Unified School District, including approximately 7,300 jobs and over \$1 billion in economic activity due to project construction, approximately 1,500 net new ongoing jobs, and approximately \$250

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million in annual economic output. Alternative 5 would also be inconsistent with the City’s objective to “transform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City.” (ESA Alternatives Memo, pp. 20-21.)

The District at South Bay Alternative would meet most but not all of the project applicant’s objectives for the project. Because the District at South Bay Alternative site would first require acquiring the site, and then redesigning and approving the project through the City of Carson, it is uncertain if this alternative site would allow the applicant to begin hosting LA Clippers home games in the 2024–2025 season, and thus could be unable to meet project applicant Objective 1a. While a state-of-the-art multi-purpose basketball and entertainment center (Objective 1a) along with team facilities (Objective 1c) and retail uses (Objective 1e) would be constructed under the District at South Bay Alternative, it would not combine with the future stadium to create a dynamic, year-round sports and entertainment district destination in the southwestern portion of the City of Inglewood (Objective 3a).

Alternative 5 may not meet one of the applicant’s basic objectives for the project. Objective 1(b) states: “Locate a basketball and entertainment center on a site that is geographically desirable and accessible to the LA Clippers’ current and anticipated fan base.” The District at South Bay Alternative site is located approximately 11 miles southeast of the Project Site. As such, the site is located 11 miles further away from the Clippers’ current home at Staples Arena in downtown Los Angeles. As part of its site selection process, the project applicant engaged a team of experienced professionals to identify sites in the greater Los Angeles area that could accommodate a new, state-of-the-art Arena and Arena support uses. (ESA Alternatives Memo, p. 18.) The preliminary analysis included sites in and around downtown Los Angeles, on the west side of Los Angeles, and also sites as far south as Long Beach. Of the sites to the south, the District at South Bay site was the closest to the preferred west side location, but was ultimately deemed less desirable than other options that were closer to the current and anticipated future fan base. (*Ibid.*) For this reason, it is unclear whether this location would achieve project applicant Objective 1(b). The project applicant has stated that Alternative 5 would not meet this objective.

### **Comparative Impacts**

Table 6-2 at the end of Chapter 6.0, Alternatives, of the EIR has an impact-by-impact comparison of the significant impacts of the Project and Alternative 5. In addition, the comparative analysis of environmental effects provided below was informed by The District at South Bay Specific Plan EIR,<sup>29</sup> which provided information relating to existing conditions in and around the Carson Alternative Site.

### ***Impacts Identified as Being the Same or Similar to the Project***

#### **Aesthetics**

Like the Project Site, the District at South Bay Alternative site is located in an urbanized area. The area in the vicinity of the Carson site does not contain notable features that would be considered unique geologic

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<sup>29</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018.  
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features or scenic resources located near a scenic highway, and does not have any scenic vistas. The site is adjacent to the San Diego Freeway which is not designated as a state scenic highway. As such, like the Project, the project built and operated at the District at South Bay Alternative site would not substantially damage any scenic resources within a state scenic highway. Because of the setting and location of adjacent uses, there would be no significant impacts related to shadowing of residences or other sensitive uses (Impact 3.1-3). These impacts would be of the same magnitude as under the Project. Finally, the spillover lighting effects of Alternative 5 would be of similar magnitude as those of the Project (Impacts 3.1-2 and 3.1-5). Adjacent to the District at South Bay Alternative site are light sensitive residences to the south and west across the Torrance Lateral Channel. Lighting in the parking lots surrounding the arena could spill over to these areas and result in light in excess of City of Carson standards on residential properties. Like the Project, Alternative 5 would require implementation of Mitigation Measures 3.1-2(a) and (b).

### **Geology and Soils**

As described above, the Alternative 5 site is a former Class II landfill that is currently undergoing remediation and closure, and which is underlain by former landfill waste materials, which have been compacted through a densification process known as Deep Dynamic Compaction (DDC). In addition, the District at South Bay Alternative site is largely located within an area designated by the City of Carson General Plan Safety Element and the State of California Seismic Hazard Maps as a CGS Liquefaction Hazard Zone.<sup>30</sup> The Alternative 5 site is outside of any established Alquist-Priolo Earthquake Fault Zone for fault rupture hazards, and no active or potentially active faults are known to pass directly under the site. Compliance with the most recent State Building Code and the City of Carson's Building Code seismic design standards and site evaluation requirements would reduce the risk of exposure of the Project's occupants and structures to ground shaking, liquefaction, differential settlement, or other geologic hazards. Thus, although geologic and seismic impacts would be greater at the District at South Bay Alternative site, impacts related to geology and soils would, as mitigated, be less than significant, and similar to those described for the Project.

### **Hazards and Hazardous Materials**

Hazardous materials impacts related to the former landfill uses on the site are discussed further below. However, impacts related to exposure of workers or residents to accidental spills or other operational hazards would be the same at the District at South Bay Alternative site as described for the Project (Impacts 3.8-1 through 3.8-3).

### **Land Use and Planning**

Like the Project, Alternative 5 would not result in the division of an established community, as the arena and other uses would be located entirely within the boundaries of the District at South Bay Alternative site; the vacation of streets would not be required. Alternative 5 would likely require an amendment to the City of Carson General Plan. With the amendment, Alternative 5 would be consistent with plans or

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<sup>30</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. IV.E-7  
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policies that have been adopted for the purposes of environmental mitigation, and thus it would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

### **Population, Employment and Housing**

According to The District at South Bay Specific Plan EIR, development under The District at South Bay Specific Plan could support a population increase of approximately 4,550 persons. However, this population growth would be within the Southern California Association of Governments' (SCAG) forecasted short- and long-term growth within the South Bay Cities Subregion.<sup>31</sup> Similar to the Project, Alternative 5 would add 768 non-event employees to the District at South Bay Alternative site, which is well below the total persons added under the Specific Plan. As a result, the employees added under Alternative 5 would also be within SCAG's forecasted short- and long-term growth within the South Bay Cities Subregion. In addition, as no housing is located on the District at South Bay Alternative site, Alternative 5 would not result in the displacement of substantial numbers of people or housing. For these reasons, impacts related to population, employment, and housing (Impacts 3.12-1 through 3.12-4) under Alternative 5 would be similar in magnitude to the Project.

### **Public Services**

Fire protection services at the District at South Bay Alternative site is provided by the Los Angeles County Fire Department (LACFD) and police protection services are provided by the Los Angeles County Sheriff's Department (LACSD). There are multiple fire stations that provide service to the project site, including Station No. 36 which is the closest to the site.<sup>32</sup> The District at South Bay Alternative site is served by the Carson Sheriff Station located at 21356 South Avalon.<sup>33</sup> With the implementation of a series of design-related mitigation measures required of new projects in the City, and including the provision of space for use by the Sheriff's Department in the arena, the Project built and operated at the District at South Bay Alternative site would have a less than significant impact on the provision of fire and police protection services (Impacts 3.13-1 through 3.13-4). This impact would be similar in magnitude to the impact at the Project Site.

Because Alternative 5 does not include residential uses, it would not adversely affect City of Carson parks and recreation facilities or Los Angeles Unified School District elementary, middle, and high schools (Impacts 3.13-5 through 3.13-12). Thus, these impacts would be the same as with the Project.

### **Transportation and Circulation**

Similar to the Project, Alternative 5 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic (Impact 3.14-11).

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<sup>31</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-16.

<sup>32</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-17.

<sup>33</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-20.

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## Utilities and Service Systems

Similar to the Project, Alternative 5 would demand approximately 103 AFY with the implementation of baseline water conservation measures and about 63 AFY with LEED Gold certification. Water service to the District at South Bay Alternative site is provided by the California Water Service Company (Cal Water). In accordance with the requirements of Senate Bill 610 and California Water Code section 10912(a), Cal Water, as the designated water supplier, prepared a WSA for development proposed under the Boulevards at South Bay Specific Plan, which found that Cal Water did have adequate water supplies to meet the projected demands of the project in addition to those of its existing customers and other anticipated future water users in the Dominguez District for the 20-year period under all conditions. A separate analysis was also conducted to determine if further analysis of water supply and demand was required in connection with The District at South Bay Specific Plan, which modified the Boulevards at South Bay Specific Plan. The District at South Bay Specific Plan was projected to have an estimated annual demand of 705 AFY, and the separate analysis found that this demand would be less than previously projected for the Boulevards at South Bay Specific Plan, and thus The District at South Bay Specific Plan did not trigger the necessity to prepare a new WSA under California Water Code section 10910(h).<sup>34</sup> As Alternative 5 would demand substantially less water than The District at South Bay Specific Plan, it also would not trigger the need to prepare a new WSA, and Cal Water would have sufficient supply from existing supplies and resources to serve development under Alternative 5.

Storm drainage infrastructure serving the District at South Bay Alternative site has been sized to accommodate intense development planned under the various versions of the specific plan that regulate development of the site. In addition, development under Alternative 5 would be required to implement drainage control features in accordance with the City's drainage control regulations as well as 2009 SUSMP requirements.<sup>35</sup> As a result, there would be no need for new or expanded storm drainage facilities (Impacts 3.15-9 and 3.15-10). These impacts would be similar to those described for the Project.

### ***Impacts Identified as Being Less Severe than the Project***

#### **Biological Resources**

The District at South Bay Alternative site has been completely disturbed and no vegetation, including trees, or habitat is present to support nesting raptors or migratory birds. As a result, Alternative 5 would not disturb nesting raptors or migratory birds (Impact 3.3-2) and would not result in the loss of protected trees (Impact 3.3-3).<sup>36</sup> Mitigation Measures 3.3-2 and 3.3-3 to reduce these impacts would not be required. As a result, unlike the Project, no impacts to nesting raptors or migratory birds and protected trees would occur under this alternative.

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<sup>34</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. pp. VI-28 to VI-31.

<sup>35</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-13.

<sup>36</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-4.  
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### **Cultural and Tribal Cultural Resources**

The District at South Bay Alternative site is a former landfill with no existing buildings or other structures. As a result, there is no potential for the development of the Project at this site to have a significant impact on unknown historical, archaeological, or tribal resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-5, 3.4-6, and 3.4-7), and/or unknown human remains (Impacts 3.4-4 and 3.4-8).<sup>37</sup> Mitigation Measures 3.4-1 and 3.4-4 to reduce these impacts would not be required. Therefore, under Alternative 5, impacts on cultural resources, including archaeological resources, tribal cultural resources, and human remains would be less severe than under the Project.

### **Geology and Soils**

As described above, because the District at South Bay site a former landfill, and ground disturbing activities would occur in soils that are clean fill and compacted former landfill materials, there would be no potential to discover unknown paleontological resources (Impacts 3.6-2 and 3.6-4). Therefore, these impacts would be less than significant under Alternative 5 and would not require the mitigation measure as identified for the Project in order to reduce the impact to less than significant.

### **Hazards and Hazardous Materials**

Impacts related to proximity to nearby airports would be less severe for the District at South Bay Alternative site than for the Project, which is under the flight path of LAX and within 2 miles of Hawthorne Airport (HHR). The closest public airport to the District at South Bay Alternative site is the Compton Airport, which is located approximately 3.25 miles to the north. Alternative 5 would not result in an air navigation hazard as the District at South Bay Alternative site is not located within an airport land use area plan. For this reason, hazards impacts associated with air navigation (Impacts 3.8-5 and 3.8-11) would be avoided under this alternative and Mitigation Measure 3.8-5 would not be required.

### **Hydrology and Water Quality**

Development under Alternative 5 would not degrade the quality of the water that is discharged from the District at South Bay Alternative site (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4). Construction on the District at South Bay Alternative site would be required to adhere to best management practices listed the NPDES General Construction Permit to reduce potential adverse effects with regard to water quality. During operation, the proposed arena and other facilities would be subject to the drainage control requirements of the County's 2009 Standard Urban Stormwater Mitigation Plan (SUSMP) permit and the City's Storm Water Pollution Control Measures for New Development Projects.<sup>38</sup> In addition, any alterations to existing drainage patterns as a result of Alternative 5 would not be of a sufficient magnitude so as to result in substantial erosion or siltation or flooding on or off site (Impact 3.9-3 and 3.9-6).<sup>39</sup> As a result, Mitigation Measures 3.9-1(a) and 3.9-1(b) to reduce impacts related to water quality and drainage would

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<sup>37</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-6.

<sup>38</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-11.

<sup>39</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-12.

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not be required. For this reason, impacts related to on-site contamination would be less than those described for the Project.

### Noise and Vibration

Noise levels under Alternative 5 would be similar to the Project but lessened as sensitive receptors to the west and south of the District at South Bay Alternative site are located further away from construction activity and roadways than sensitive receptors under the Project. The nearest sensitive residential receptors that may be affected by the Project at the District at South Bay Alternative site are one- and two-story detached residences and mobile homes that are located across the Torrance Lateral Channel to the south and west of the site. Future residential uses have been approved across Del Amo Boulevard from the area of the District at South Bay Alternative site. In addition, the San Diego Freeway is a substantial noise source to the east of the District at South Bay Alternative Site, and the Porsche Experience, located across Del Amo Boulevard immediately north of the recently approved residences, is an entertainment use that already creates substantial noise in the area. Ambient noise levels measured at the site range from about 50 to 78 dBA across the site, generally in a west-to-east configuration with higher noise levels near the San Diego Freeway, and lower levels near the residential uses south and west of the site.<sup>40</sup> This is a much wider range of noise levels than at the Project Site. Because the noise levels produced by ~~Alternative Site Project~~ constructed at the District at South Bay Alternative site would be similar to those predicted for the Project, it is possible that the impacts would be less severe on the eastern side of the property, near the San Diego Freeway, and potentially more severe on the south and western side of the site, adjacent to current residential uses.

Therefore, impacts associated with a temporary increase in noise during construction and a permanent increase in noise during operation (Impacts 3.11-1, 3.11-2, 3.11-5, and 3.11-6) would be reduced, but would still require implementation of Mitigation Measure 3.11-1, which would require the implementation of measures and controls to reduce noise during construction, Mitigation Measure 3.11-2(a), which would require the preparation of an operations noise reduction plan, and Mitigation Measure 3.11-2(b), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)). In addition, vibration levels under Alternative 5 would also be similar to the Project but lessened for the same reasons. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-7) would be reduced, but would still require the implementation of Mitigation Measures 3.11-3(a) through (c), which requires minimum distances of construction equipment from sensitive receptors and the designation of a construction relations officer to field vibration-related complaints.

### Transportation and Circulation

The District at South Bay Alternative site is located approximately 3.5 miles from the Metro Blue Line station at Del Amo Boulevard, approximately 1.5 miles from the Metro Silver Line station on the I-110 freeway at Carson Street, and approximately 1.8 miles from the Harbor Gateway Transit Center. As such, it is assumed that the Project at this location would provide shuttle service to the Blue Line and Silver Line

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<sup>40</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. Table IV.H-1, p. IV.H-6. 17077.001 4847-6266-0032.1

similar to the shuttle service to the Crenshaw/LAX and Green Lines to be provided as part of the Project. Although the Silver Line is an express bus service with lower capacity than a light rail line, bus service can be readily increased if needed and the Silver Line provides one-seat service to the Metro Red/Purple Lines and Union Station in downtown Los Angeles. As such, it is anticipated that vehicle trip generation for events in the arena at the District at South Bay Alternative site would be similar to that for the Project.

Regional access to the District at South Bay Alternative site would be provided by the I-405 freeway (immediately adjacent to the east), the I-110 freeway (approximately 0.5 miles to the west), the SR-91 freeway (about 1.9 miles to the north), and the I-710 freeway (approximately 3.4 miles to the east). Overall, these regional highway facilities are located closer to the District at South Bay Alternative site than the regional highway facilities that serve the Project are to the Project site, including direct access to the I-405 freeway via the Avalon Boulevard interchange located immediately adjacent to the site (Impacts 3.14-7 through 3.14-9, Impacts 3.14-22 through 3.14-24, and Impacts 3.14-29 and 3.14-34). Direct access to the site is provided by three streets designated as major highways in the City of Carson General Plan: Del Amo Boulevard (six lanes), Avalon Boulevard (six lanes), and Main Street (four lanes). There are no direct street connections across the Torrance Lateral Flood Control Channel connecting to the residential neighborhoods to the south and west. For all of these reasons, locating the Project on the District at South Bay Alternative site would likely impact a lesser number of intersections and neighborhood streets than the Project (Impacts 3.14-1 through 3.14-6 and Impacts 3.14-16 through 3.14-21).

Since all parking would be provided on site under Alternative 5, pedestrian impacts would be lessened since impacts associated with pedestrians crossing arterial streets would not be expected to be significant (Impact 3.14-13). This could also potentially lessen eventgoer confusion regarding where they should park and reduce local circulation.

The elimination of the hotel use would avoid the significant VMT impact identified for the Project's hotel use (Impact 3.14-10).

The nearest emergency room to the Alternative 5 site is located at the Harbor-UCLA Medical Center, approximately 1.1 miles from the site. Given the distance from the site and that the Harbor-UCLA Medical Center is located on the far side of the Harbor Freeway and served by different major arterials (Carson Street, Vermont Avenue, and Normandie Avenue) than those serving the site, impacts on emergency access would not be expected to be significant, and likely would not require mitigation (Impact 3.14-14, 3.14-26, 3.14-31, and 3.14-36).

Construction impacts on traffic were determined to be significant for the Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the Project at the Alternative 5 site would be generally internal to the site and would likely not involve temporary lane closures along arterial streets. Therefore, construction impacts for Alternative 5 would be less than those for the Project.

Given that the location of the District at South Bay Alternative site is over 8 miles from The Forum and the NFL Stadium, the Project at this site would not be likely to have additional significant impacts on

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intersections, neighborhood streets, freeway facilities, and public transit during concurrent events at The Forum and/or the NFL Stadium (Impacts 3.14-28 and 3.14-29 and Impacts 3.14-33 and 3.14-34).

### ***Impacts Identified as Being More Severe than the Project***

#### **Air Quality and GHG Emissions**

Air Quality and GHG emissions during construction under Alternative 5 would be similar to the Project but slightly lessened as this alternative would not include the planned hotel on the East Transportation Site and no parking structures would be constructed. However, operational air pollutant and GHG emissions would be increased compared to the Project because the project developed at the District at South Bay Alternative site would have less accessibility to transit and therefore higher automobile trip generation. In addition, because of its increased distance from Staples Center, VMT would be increased due to increased trip lengths. The combination of increased trips and increased trip lengths means that transportation-related emissions of criteria air pollutants and GHGs would be increased compared to the Project. Therefore, similar to the Project, Alternative 5 would conflict with implementation of the applicable air quality plans, however operational emissions associated with the alternative would exceed thresholds established by the SCAQMD for criteria air pollutants by a greater amount than under the Project (Impact 3.2-1 and 3.2-5).

Impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6), localized maximum daily operational emissions (NO<sub>2</sub>) (Impacts 3.2-3 and 3.2-7), and GHG emissions (Impact 3.7-1 and 3.7-2) would be increased, and would still require the implementation of Mitigation Measure 3.2-2(a), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)), Mitigation Measure 3.2-2(b), which would require the testing of the emergency generators and fire pump generators on non-event days, Mitigation Measure 3.2-2(c), which would require preparation and implementation of a Construction Emissions Minimization Plan, Mitigation Measure 3.2-2(d), which would require the project applicant to encourage the use of zero- and near-zero emissions vendor and delivery trucks, Mitigation Measure 3.7-1(a), which would require the implementation of a GHG reduction plan, and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the project below the net new GHG emissions threshold of significance. It is very likely that the required GHG offsets would be materially greater than under the Project.

#### **Energy Demand and Conservation**

Impacts related to Energy Demand and Conservation would be greater for the District at South Bay Alternative than those of the Project. Like for the Project, it is assumed that the Alternative 5 project would be built to comply with the requirements of LEED Gold certification. Because the project at the District at South Bay Alternative site would not include construction of either the hotel or the parking structures, energy required for construction would tend to be less than under the Project. However, due to increased trip making and VMT, operational transportation energy would be increased compared to the Project. Construction impacts, which may be decreased compared to the Project, are one-time events and relatively short in duration, compared to operational impacts which occur on a continual basis over a 30-

year or more period. Thus, on balance, energy effects of the project at the District at South Bay Alternative site would be more severe than those of the Project (Impacts 3.5-2 and 3.5-4).

### Hazards and Hazardous Materials

The initial investigations of contamination at the District at South Bay Alternative site go back to the late 1970s. As a result of contamination discovered on and adjacent to the District at South Bay Alternative site, the site was listed as a hazardous substances site by the California Department of Toxic Substances Control (DTSC) in the 1980s and a remedial action order requiring implementation of remedial activities was issued for the site in 1988.<sup>41</sup> Remediation of the District at South Bay Alternative site was divided by the DTSC into two operable units (OU). A remedial action plan (RAP) for the Upper OU was approved in 1995, which was modified by an Explanation of Significant Differences (ESD) in 2009. A separate RAP for the Lower OU was prepared in 2005. The purpose of the Upper OU RAP was to make the District at South Bay Alternative site safe for future development. The purpose of the Lower OU RAP was to protect groundwater resources and was not required to make the District at South Bay Alternative site safe for future resources.<sup>42</sup>

The Upper OU RAP requires the installation, operation, and maintenance of (1) a landfill cap designed to encapsulate the waste and create a barrier between future improvements and buried waste, (2) an active gas collection and treatment system designed to remove landfill gases from under the landfill cap, and (3) a groundwater collection and treatment system designed to contain a groundwater plume underneath the site and treat the extracted groundwater prior to discharge.<sup>43</sup> Development under Alternative 5 would be required to adhere to these requirements. The arena foundation would need to be supported by a pile system, with individual piles driven to the bearing soil beneath the waste. Given the density of the pile system to support a building of the scale of the proposed arena, and the nature of the extensive landfill gas collection system, it is likely that material changes to the landfill gas collection system may be required, and it is possible that construction workers could be exposed to contamination during ground disturbing and foundation construction activities. These impacts would be more severe than those described for the Project in Impact 3.8-4. Mitigation Measure 3.8-4 would require the preparation and approval of the Soil Management Plan prior to initiating earthwork activities, which would reduce the potential for worker exposures. This measure would be required to be expanded to include coordination with the State Department of Toxic Substance Control (DTSC), and implementation of any required amendments or updates to the RAP for the site. For this reason, impacts related to on-site contamination would be more severe than those described for the Project.

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<sup>41</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. II-13.

<sup>42</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. II-14.

<sup>43</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. II-14.  
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## Transportation and Circulation

Three of the streets surrounding or within the Alternative 5 site are identified in the City of Carson *Master Plan of Bikeways*<sup>44</sup> for future bicycle improvements: colored buffered bike lanes on Del Amo Boulevard, buffered bike lanes on New Stamps Road, and a bike path along Lenardo Drive (shown as Stadium Way on Figure 6-4) from the east end of the site to Avalon Boulevard. As such, depending on the location of parking access and shuttle bus pull-outs, construction and operation of the Project could adversely affect planned bicycle facilities. Strategic placement of Traffic Control Officers could potentially mitigate any such impacts.

Average trip lengths for attendees of events at the District at South Bay Alternative site would likely be longer than those for events at the Project given the site's location farther from the regional center, increasing the level of the significant VMT impacts identified for events at the Project (Impact 3.14-10).

## Basis for Finding

Alternative 5 (The District at South Bay Alternative Site) would avoid or lessen some impacts associated with the Project; however, this alternative would also increase impacts to air quality and GHG emissions, energy demand and conservation, hazards and hazardous materials, and transportation and circulation. Because the Project would be located within the City of Carson, none of the City of Inglewood's objectives for the Project would be met under the alternative. For example, similar to Alternative 4, the City would be unable to achieve its goals of promoting the City as a premier regional sports and entertainment center (City Objective 1), enhancing the City's general economic health by stimulating new business and economic activity (City Objective 2), and constructing (with private funds) a public assembly space that would host sporting, cultural, business, and community events (City Objective 8). Additionally, the project applicant's objectives related to hosting LA Clippers home games in the 2024–2025 season, creating a dynamic, year-round sports and entertainment district destination in the southwestern portion of Inglewood, and locating a basketball and entertainment center on a site that is geographically desirable and accessible to the LA Clippers' current and anticipated fan base would not be met under this alternative.

The District at South Bay Alternative site also does not meet the definition of “project area” included in Public Resources Code section 21168.6.8(a)(5). Thus, Alternative 5 would not meet the requirements for compliance with AB 987. As a result of this change, should the adequacy of the EIR be litigated, rather than the AB 987 dictated 270-day process for legal proceedings, including any potential appeals, the project would be subject to the established legal process which can take three or more years. As a result of a more extended legal process, litigation regarding the adequacy of an EIR for Alternative 5 would likely obstruct the ability to meet the project applicant's schedule objective to open in time for the 2024-2025 NBA season. In addition, because AB 987 would not apply at this site, there would be as a loss of environmental benefits, as the measures the project applicant has committed to in the Greenhouse Gas Reduction Plan would not be implemented under Alternative 5. (ESA Alternatives Memo, p. 21.) In

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<sup>44</sup> City of Carson, 2013. *Carson Master Plan of Bikeways*. August 2013.  
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addition, the City would receive none of the substantial community benefits incorporated into the Development Agreement for the Project. (ESA Alternatives Memo, p. 21.)

As set forth in the ESA Alternatives Memo, this alternative is considered infeasible for the following, additional reasons:

- It is uncertain whether the City of Carson would consider an alternative plan for the site, given extensive efforts that have gone into the current plan for the area.
- Given the amount of development proposed for the site and the effort that went into obtaining the approval of these entitlements, it is unknown if the undeveloped portion of the site is available for purchase or if the owner of the site would be willing to sell to the project applicant. In addition, the City of Carson is currently in negotiations with a developer to construct commercial retail/entertainment and industrial uses on a 90-acre portion of the site, and if the negotiations are successful, then a large portion of the site would be unavailable for purchase.
- The site is located on a former Class II landfill that is undergoing remediation and closure. The arena would have to be designed so that it is compatible with the presence of solid waste at the site. Additional costs would range from \$35-70 million, with an additional \$5-15 million for special construction within contaminated soils and ongoing remediation, and considerable extended time to accommodate additional design and construction. The arena would be an “island” surrounded by parking, and would thus lack the cohesive, integrated “feel” that is considered preferable from a design perspective.
- Public transit is less accessible and, given the location, it would be very difficult to integrate the site into regional transit options.
- The project applicant has stated that the site is in a less desirable location in relation to the Clippers’ fan base, resulting in less convenience and longer drive times.

(ESA Alternatives Memo, pp. 17-21.) The City Council rejects Alternative 5 (The District at South Bay Alternative Site) on each of these grounds independently. All of the reasons provide sufficient independent grounds for rejecting this alternative.

### Finding

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible Alternative 5.

## **6. Alternative 6: Hollywood Park Specific Plan Alternative Site**

### **Description**

Under Alternative 6, elements of the Project would be developed on an approximately 12-acre site near the NFL Stadium currently under construction within the Hollywood Park Specific Plan (HPSP) area to

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the north of the Project Site across West Century Boulevard (see Figure 6 5). As with the Project, Alternative 6 would involve the construction of a new multi-purpose arena to serve as the home of the LA Clippers NBA basketball team in the City of Inglewood and as much of the related development included in the Project as feasible, including the relocation of the LA Clippers team offices and team practice and athletic training facility.

The focus of this alternative is to identify the impacts that would occur if the arena and related uses, including the ancillary plaza uses, would be developed on a site (the HPSP Alternative site) within the HPSP area to potentially avoid or lessen the transportation-related impacts associated with concurrent events at the NFL Stadium and the Project. As a means of avoiding or lessening these impacts, Alternative 6 assumes that the arena and NFL Stadium operators would be able to reach a mutually agreed schedule coordinating events at the two venues. The analysis also focuses on whether locating the Project on the Alternative 6 site would otherwise avoid or reduce one or more significant environmental impacts of the Project.

Alternative 6 would include sufficient land to potentially accommodate the uses included in the Project, provided the property would become available and could be acquired by the project applicant.

The HPSP area includes development under the Stadium Alternative of the HPSP. This analysis assumes the completion of development of certain components referred to as the HPSP Adjusted Baseline projects in Section 3.0.5, which include the construction of a 70,000-seat open air NFL Stadium, a 6,000-seat performance venue, 518,077 square feet of retail and restaurant uses, 466,000 square feet of office space, 314 residential units, an 11.89-acre park with a large water feature, a 4-acre civic use, and approximately 9,900 parking spaces within the HPSP area. Although the retail, dining, and multi-purpose space for community programming could potentially be incorporated into the previously planned and approved development at Hollywood Park, the evaluation of this Alternative 6 for the purposes of this analysis conservatively assumes that such development would be additive to the HPSP development included in the Adjusted Baseline together with approved future development within the HPSP area. In other words, under this alternative, the uses proposed as part of the Project would not supplant development authorized under the HPSP, but would be added atop the development authorized under the HPSP.

Alternative 6 would involve the development of the Project within the HPSP area on an approximately 12-acre site to the south of the NFL Stadium currently under construction. This evaluation of Alternative 6 assumes the completion of the proposed development described as the HPSP Adjusted Baseline Projects in Section 3.0.5. The Alternative 6 site is comprised of parcels currently approved for future development in the HPSP, as discussed in Section 3.0.6 (Cumulative Assumptions). The Alternative 6 site would be approximately 75 percent of the size of the Arena Site (and approximately 47 percent of the total Project Site, including the parking parcels), but would accommodate many of the uses proposed by the Project (e.g., the athletic training and practice facility, LA Clippers team offices, and sports medicine clinic).

Uses in the vicinity of the Alternative 6 site include the HPSP Adjusted Baseline Projects, including retail, park, residential, commercial office, stadium, hotel and ancillary uses. The area to the north of the HPSP area is zoned C-R Commercial Recreation and includes the historic Forum concert venue and

associated surface parking. The area to the east of the HPSP area is zoned R-2 Residential Limited Multi Family, Open Space, R-1 Residential Single Family, and C-R Commercial Recreation. The area to the south of the HPSP area is zoned C-2A Airport Commercial and M-1 Light Manufacturing. The area to the west of the HPSP area is zoned C-2A Airport Commercial and C-2 General Commercial.

Similar to the Project, development under Alternative 6 would include the Arena Structure, including an approximately 915,000 sf arena to host LA Clippers NBA games and other events, the LA Clippers team offices (71,000 sf), the LA Clippers practice and training facilities (85,000 sf) and a sports medicine clinic (25,000 sf). Seating capacity of the arena would remain at 18,000 attendees for LA Clippers NBA basketball games and a maximum capacity of up to 18,500 attendees for concert events. The overall design of the Arena Structure under Alternative 6 would be identical to the Project, with the modification that the parking structure adjacent to the Arena Structure in the Project would not be constructed. Access to the arena would be provided from a landscaped pedestrian plaza in the HPSP area, along the southern edge of Lake Park, and lead directly into the main lobby of the arena.

Although the retail development within the HPSP area described in the Adjusted Baseline would be located directly adjacent to the Alternative 6 site, and the ancillary retail, dining, and multi-purpose space for community programming uses included in the Project could potentially be located within that development, this evaluation of Alternative 6 assumes that the total 63,000 sf of ancillary uses would be additional to the development within the HPSP area analyzed in the Adjusted Baseline and Cumulative analyses described in Section 3.0. Thus, as with the Project, Alternative 6 would include the development of 24,000 sf of food and drink uses, 24,000 sf of retail uses, including a 7,000 sf LA Clippers team store, and 15,000 sf of multi-purpose space for community programming. Alternative 6 would not include the construction of a new hotel or removal of an existing municipal water well and construction of a new replacement well. The proposed West Parking Structure and East Parking Structure and Transportation Hub components of the Project would not be constructed under Alternative 6.

Primary access to the area around the HPSP IBEC Site would be from West Century Boulevard and South Prairie Avenue to the internal access roads within the HPSP Area. Development of Alternative 6 would require modification of the alignment of a proposed internal roadway along the Alternative 6 site and accompanying utilities to the south to accommodate the arena and ancillary development.

Regional access to the Alternative 6 site is essentially the same as for the Project Site and is provided by the San Diego Freeway (I-405), located approximately 2.6 miles to the west, and the Glenn Anderson Freeway & Transitway (I-105), located 1.6 miles to the south. Local access to the Alternative 6 would be slightly different from the Project, provided by several major arterials, including South Prairie Avenue and West Century Boulevard with alternative connections to Hawthorne Boulevard, Crenshaw Boulevard and Arbor Vitae Street.

Transit access to the HPSP site is provided by several bus lines and the future Crenshaw/LAX light rail line. The closest bus stop, at the intersection of South Prairie Avenue and Hardy Street, is about one-third of a mile from the Alternative 6 site, and the nearest light rail station is approximately 1.5 miles away. Similar to the Project, development of the Alternative 6 would include shuttle service to and from existing

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nearby rail transit stations and a shuttle drop-off and pick-up area near the arena to accommodate the shuttle service.

A total of 1,045 additional parking spaces would be developed within surface parking areas and subterranean parking structures located within the Alternative 6 site, as shown on Figure 6 5. The parking structures and surface parking areas would be accessed from the internal street network within the HPSP area, with primary access from South Prairie Avenue and Pincay Drive, with access to certain premium parking areas from the proposed Stadium Drive accessed from West Century Boulevard.

The HPSP requires that “no less than nine thousand (9,000) spaces located throughout the HPSP area shall be made available” for the NFL Stadium. As described in Section 3.0.5, the Adjusted Baseline includes approximately 9,900 spaces located within the HPSP area based on information included in plans submitted to the City of Inglewood. This analysis assumes that the development of an arena under Alternative 6 would include an agreement between the operators of the NBA arena and the NFL Stadium to coordinate events and shared parking. The remaining parking demand for events at the arena developed under Alternative 6 would be provided through the parking facilities within the HPSP area through coordination between the NFL Stadium and parking facility operators and the operator of the arena. Such coordination is anticipated to include location of the TNC loading areas and other transportation facilities such as charter bus and microtransit staging and loading areas sufficient to serve Alternative 6.

The parcels included in the Alternative 6 site are designated Mixed-Use (MU) within the current HPSP which permits athletic, social, entertainment, dining recreation and leisure uses. The area immediately to the north of the Alternative 6 site would continue be developed as Lake Park, an open space area with a large water feature. The total permitted development as described in the HPSP would continue to be permitted. Thus, the uses within the MU zone that might have otherwise been developed at the Alternative 6 site would be developed elsewhere within the HPSP. The HPSP contains sufficient land to accommodate the relocation of these uses.

If Alternative 6 were developed, it is anticipated that the ownership of the properties within the Project Site would not change, private property would not need to be acquired for development of the proposed uses, and none of the uses that presently occupy the Project Site would be relocated. Similarly, the vacation of either West 101st Street or West 102nd Street would not be required. Potentially, a portion of the properties within the Project Site owned by the City and or the Successor Agency could be used for construction staging under Alternative 6. However, the revitalized development of the Project Site would not occur as part of Alternative 6.

The HPSP area is a privately-owned property subject to a detailed specific plan (the Hollywood Park Specific Plan), as well as a Development Agreement between the City and the HPSP developer. Development authorized under the HPSP is currently being implemented. There is, therefore, substantial uncertainty regarding site control and the feasibility of this alternative. The development of Alternative 6 would potentially require amendments to the HPSP, which would require the consent of the landowner and approval of the City pursuant to the terms of the Development Agreement between the City and the property owner.

### **Relationship to Project Objectives**

The HPSP Alternative would meet some of City's objectives for the Project. In particular, the HPSP Alternative would meet the City's goals of becoming a regional sports and entertainment center (City Objective 1) and stimulating economic development (City Objective 2). The HPSP site has an approved specific plan that is currently being implemented. As such, although portions of the HPSP area are currently vacant, they are planned for development, and development is proceeding. Thus, the HPSP area is not underutilized to the same degree as the Project Site. Because City objective 5 is to "[t]ransform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City," Alternative 6 would not be as responsive to this objective as the Project.

The HPSP Alternative would meet most but not all of the project applicant's objectives for the project. Because the HPSP Alternative would first require feasibly acquiring the site, potentially amending the existing HPSP and its implementing documents, including a Development Agreement, it is uncertain if Alternative 6 would allow the applicant to begin hosting LA Clippers home games in the 2024–2025 season. For this reason, the HPSP Alternative could be unable to meet project applicant Objective 1a.

### **Comparative Impacts**

Table 6-2 at the end of Chapter 6.0, Alternatives, of the EIR has an impact-by-impact comparison of the significant impacts of the Project and Alternative 6. The comparative analysis of environmental effects provided below was informed by the 2009 Hollywood Park Redevelopment Project EIR (HPRP EIR),<sup>45</sup> which contains information relating to conditions in and around the HPSP Alternative site, and the environmental impacts of redevelopment of the site.

#### ***Impacts Identified as Being the Same or Similar to the Project***

Because the size of the Proposed arena and the amount of ancillary development would be the same as the development in the Project, many of the impacts of the Project that are affected by the intensity of development would remain the same or very similar at the HPSP Alternative Site.

#### ***Aesthetics***

HPSP Alternative site, along with the entirety of the HPSP area, is located in an urbanized community that is currently undergoing development. The area in the vicinity of the HPSP Alternative site does not have any scenic vistas or unique visual characteristics. Visual impacts associated with Alternative 6 would be similar to the Project (Impacts 3.1-1 and 3.1-4) although limited views along South Prairie Avenue due to the proposed pedestrian bridge would not occur under this alternative.

The nearest shadow sensitive uses are existing residences located approximately 2,100 feet to the east and residences located about 1,100 feet to the west, as well as new residences being constructed under the

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<sup>45</sup> City of Inglewood, 2009. *Hollywood Park Redevelopment Project EIR*. July 2009.  
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Adjusted Baseline about 750 feet to the west, and under cumulative conditions about 750 feet to the east. Given these distances, like with the Project, there would be no significant impacts related to shadowing of residences or other sensitive uses (Impact 3.1-3). For these reasons, impacts related to views, and shadow would be similar to those of the Project.

### **Cultural Resources**

Like the Project Site, there are no known archaeological or historical resources located on the HPSP Alternative site. According to the HPRP EIR, it is possible that development on the HPSP site could disturb buried archaeological resources,<sup>46</sup> and disturb unknown human remains.<sup>47</sup> Since the preparation of the HPRP EIR, substantial ground disturbing earthwork has taken place on the HPSP site, and thus surface soils have been highly disturbed to prepare the property for development. However, like at the Project Site, the Proposed Arena would require excavation to a depth of approximately 35 feet, which is below the area that has been recently disturbed. Therefore, like with the Project, it is possible that implementation of Alternative 6 could cause a substantial adverse change in the significance of unknown historic, archaeological, or tribal cultural resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-5, 3.4-6, and 3.4-7), and/or unknown human remains (Impacts 3.4-4 and 3.4-8). Mitigation Measures 3.4-1 and 3.4-4 would reduce these impacts by requiring that work stop if such resources are uncovered, and that the resources be appropriately evaluated and treated. Therefore, impacts on archaeological resources and human remains would be similar to the Project.

### **Geology and Soils**

Impacts related to geology and soils conditions and hazards, including paleontological resources would be similar to those described for the Project. Because Alternative 6 would occur less than one-half mile from Project Site, the same geological and soils conditions that would be encountered in construction of Alternative 6 would be essentially the same as with the Project. The Potrero Fault, which is approximately 0.5 miles from the Project Site, is closer to the Forum Alternative site, approximately 0.4 miles to the east; however, compliance with the California Building Code would avoid the creation of seismic hazards. According to the HPRP EIR, it is possible that development on the HPSP site could disturb previous unknown unique paleontological resources,<sup>48</sup> but because there would be less ground-disturbing activity because of the reduced amount of development in Alternative 6, the potential for erosion and accidental discovery of paleontological resources would be correspondingly decreased (Impacts 3.6-2 and 3.6-4). However, these impacts would continue to be potentially significant under Alternative 6 and would require the same mitigation measures as identified for the Project in order to reduce the impact to less than significant.

### **Hazards and Hazardous Materials**

As discussed above, the HPSP Alternative site has been mass graded as part of HPSP development activities, and as part of these activities, sites within the HPSP Alternative site containing soil

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<sup>46</sup> City of Inglewood, 2009. *Hollywood Park Redevelopment Project EIR*. July 2009. p. IV.E-28.

<sup>47</sup> City of Inglewood, 2009. *Hollywood Park Redevelopment Project EIR*. July 2009. p. IV.E-28.

<sup>48</sup> City of Inglewood, 2009. *Hollywood Park Redevelopment Project EIR*. July 2009. p. IV.E-29.

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contamination have been remediated. However, it is possible that previously contaminated soils may still remain on the HPSP Alternative site, and thus, as with the Project, construction workers could be exposed to contamination during ground disturbing activities (Impact 3.8-4). Mitigation Measure 3.8-4 would require the preparation and approval of the Soil Management Plan prior to initiating earthwork activities, which would reduce the potential for worker exposures. For this reason, impacts related to on-site contamination would be similar to the Project.

### **Hydrology and Water Quality**

Similar to the Project, it is possible that construction and operation of Alternative 6 could degrade the quality of the water that is discharged from the HPSP Alternative site (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4). In addition, as with the Project, altered drainage patterns on the HPSP Alternative site during both construction and operation have the potential to result in erosion, sedimentation, and/or flooding on or off site by redirecting or concentrating flows (Impact 3.9-3 and 3.9-6). Although it is not yet designed, it is likely that the drainage system for Alternative 6 would be tied into the comprehensive drainage and water quality treatment system being constructed in the HPSP area, including the adjacent Lake Park. Mitigation Measure 3.9-1(a) would require the project at the HPSP Alternative site to comply with a number of regulations governing water quality and drainage while Mitigation Measure 3.9-1(b) would require the periodic sweeping of parking lots during operation to remove contaminants. As a result, impacts related to water quality and drainage would be similar to those described for the Project.

### **Land Use and Planning**

Like the Project, Alternative 6 would not result in the division of an established community, as the arena and other uses would be located entirely within the HPSP area; the vacation of streets would not be required. Alternative 6 would potentially require approval of amendments to the HPSP, and related entitlement documents. With the approval of such amendments, Alternative 6 would be consistent with plans or policies that have been adopted for the purposes of environmental mitigation, and thus it would have less-than significant impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

### **Noise and Vibration**

Vibration sensitive receptors within the HPSP area, including commercial retail buildings that will be constructed under the Adjusted Baseline, are located in close proximity to the HPSP Alternative site. Construction vibration levels under Alternative 6 would be similar to the Project due to the use of similar amounts of equipment and construction methods. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-7) would be the same, and would still require implementation of Mitigation Measures 3.11-3(a) through (c), which requires minimum distances of construction equipment from sensitive receptors and the designation of a construction relations officer to field vibration-related complaints.

### **Population, Employment and Housing**

Impacts related to Population, Employment and Housing (Impacts 3.12-1 through 3.12-4) would remain less than significant under Alternative 6. However, employment generation on the HPSP Alternative site would be reduced by about 7 percent as no hotel would be constructed.

### **Public Services**

Because Alternative 6 would have the same type and amount of development (other than the elimination of the hotel and water well), and the same event profile as the Project, under Alternative 6 impacts of the Project on public services, including fire and police protection, parks and recreation facilities, would remain similar and would continue to be less than significant (see Impacts 3.13-1 through 3.13-12). Because employment on the Alternative 6 site would be reduced by about 7 percent under Alternative 6, impacts on public schools (Impacts 3.13-11 and 3.13-12), already less than significant for the Project, would be further reduced slightly under Alternative 6. The arena and commercial uses under Alternative 6 would be expected to generate a total of 49 new school students, a reduction of 1 student compared to the 50 students under the Project as described in Table 3.13-9.

### **Transportation and Circulation**

Under Alternative 6, the Project would be of similar size to the Project, with a similar level of access to rail transit via shuttles for major events. As such, it is anticipated that vehicle trip generation for arena events and the ancillary uses at the Alternative 6 site would be similar to that for the Project. Given the proximity of the Alternative 6 site to restaurant and retail uses proposed as part of the HPSP, arrival and departure times before and after events could spread somewhat to the extent that these uses attract additional eventgoers. However, a material reduction in the level of intersection or freeway facility impacts would not be expected.

Because the Alternative 6 site is across the West Century Boulevard from the Project Site, the VMT characteristics of Alternative 6 would be essentially the same as for the Project. The event and retail components of Alternative 6 would have significant VMT impacts similar to those for the Project. The office, practice facility, sports medicine, and restaurant components of Alternative 6 would have less than significant VMT impacts similar to those for the Project.

Similar to the Project, Alternative 6 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic.

The Alternative 6 site is located approximately 0.5 miles from the Centinela Hospital Medical Center. Impacts of the Project-related congestion on emergency access would be similar to those for the Project.

### ***Impacts Identified as Being Less Severe than the Project***

#### **Aesthetics**

The nearest light sensitive uses are existing residences located approximately 2,100 feet to the east and residences located about 1,100 feet to the west, as well as new residences being constructed under the Adjusted Baseline about 750 feet to the west, and residences that would be developed under cumulative conditions about 750 feet to the east. Given these distances there would be no significant spillover lighting effects (Impacts 3.1-2 and 3.1-5), and Mitigation Measures 3.1-2(a) through (c) would not be required. For these reasons, impacts related to spillover lighting would be less than described for the Project.



## **Air Quality and GHG**

Air Quality and GHG emissions during construction and operation under Alternative 6 would be similar to the Project but slightly lessened because Alternative 6 would not include the planned hotel on the East Transportation and Hotel Site or a new potable water well. Therefore, similar to the Project, Alternative 6 would conflict with implementation of the applicable air quality plans, as construction and operational emissions associated with the alternative, though somewhat reduced, would still exceed thresholds established by the SCAQMD for criteria air pollutants (Impact 3.2-1 and 3.2-5).

Impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6) and GHG emissions (Impact 3.7-1 and 3.7-2) would be slightly reduced, but would still require the implementation of Mitigation Measure 3.2-2(a), which would require the implementation of a Transportation Demand Management (TDM) program (Mitigation Measure 3.14-2(b); Mitigation Measure 3.2-2(b), which would require the testing of the emergency generators and fire pump generators on non-event days; Mitigation Measure 3.2-2(c), which would require the preparation and implementation of a Construction Emissions Minimization Plan; Mitigation Measure 3.2-2(d), which would require the project applicant to encourage the use of zero- and near-zero emissions vendor and delivery trucks; Mitigation Measure 3.7-1(a), which would require the implementation of a GHG reduction plan; and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the project below the no net new GHG emissions threshold of significance.

## **Biological Resources**

The HPSP Alternative site has been mass graded and completely disturbed. No vegetation, including trees, or other habitat is present to support nesting raptors or migratory birds. As a result, Alternative 6 would not disturb nesting raptors or migratory birds (Impact 3.3-2) and would not result in the loss of protected trees (Impact 3.3-3). Mitigation Measures 3.3-2 and 3.3-3 to reduce these impacts would not be required. As a result, unlike the Project, no impacts to nesting raptors or migratory birds and protected trees would occur under this alternative.

## **Energy Demand and Conservation**

Energy demand during construction and operation under Alternative 6 would be similar to the Project but slightly lessened as this alternative would not include the construction and operation of a hotel on the East Transportation and Hotel Site or a new replacement potable water well (Impacts 3.5-2 and 3.5-4).

## **Hazards and Hazardous Materials**

Unlike the Project Site, the HPSP Alternative site is located in between the approach flight paths for the primary runways at LAX, and is not located within the planning boundary/airport influence area (AIA) established for LAX in the Los Angeles County Airport Land Use Plan (ALUP). Further, compared to the Project Site, the additional distance between the Alternative 6 site and the Hawthorne Airport (HHR) would mean that the arena structure at the Alternative 6 site would not penetrate the HHR horizontal imaginary surface, but construction cranes for the arena would continue to penetrate the HHR horizontal surface. In addition, the arena construction cranes would penetrate both the HHR horizontal surface and notification surface. As a result, while there would be no significant impact related to penetration of the

LAX obstacle clearance surface (Impact 3.8-5) under Alternative 6, this alternative would still require the implementation of Mitigation Measure 3.8-5.

### **Noise and Vibration**

Under the Adjusted Baseline, noise sensitive receptors within the HPSP area would be located approximately 750 feet to the west of the HPSP Alternative site. Under cumulative conditions, additional noise sensitive receptors would be located approximately 750 to the east within the HPSP area. These noise sensitive receptors would be substantially further from the Alternative 6 site than the sensitive receptors that are located immediately adjacent to the Project Site.

Construction noise levels generated under Alternative 6 would be similar to the Project due to the use of similar amounts of equipment and construction methods. Because noise sensitive receptors would be further from the Alternative 6 site than the Project Site, impacts associated with a temporary increase in noise during construction (Impacts 3.11-1 and 3.11-5) would be less severe than under the Project, but would still require the implementation of measures and controls to reduce noise during construction (Mitigation Measure 3.11-1) and would remain significant and unavoidable.

Traffic generated under Alternative 6 would use much of the same roadway network as the Project. However, traffic under Alternative 6 would be shifted away from noise sensitive receptors south of West Century Boulevard, and thus would not negatively affect as many sensitive receptors as the Project. In addition, operational sound from outdoor plaza events would be reduced as noise sensitive receptors would be located much farther away from amplified noise than under the Project and, due to the positioning of the stage, the amplified noise would be directed northwest across the lake and not in the direction of sensitive receptors located to the west and east. Thus, impacts associated with a permanent increase in noise during operation (Impacts 3.11-2 and 3.11-6) would be reduced, but would still require the implementation of Mitigation Measure 3.11-2(a), which would require the preparation of an operations noise reduction plan, and Mitigation Measure 3.11-2(b), which would require the implementation of a Transportation Demand Management (TDM) program (Mitigation Measure 3.14-2(b)); in total, operational noise impacts would remain significant and unavoidable, although likely reduced from the Project.

### **Transportation and Circulation**

Given the location of the site within HPSP, the Project at this location could have a reduced level of impacts on existing neighborhood streets. That is because a grid network of residential streets only exists to the west of South Prairie Avenue and south of West Century Boulevard and not to the east or north of the site. For this reason, those traveling to or from the Alternative 6 site would be less likely to travel on existing neighborhood streets than they would at the Project site. The potential for such impacts would still exist, and the same mitigation measures would apply, which would reduce but not eliminate the significant and unavoidable neighborhood street impacts.

The elimination of the hotel use would avoid the significant VMT impact identified for the Project's hotel use.

Since all parking would be provided either on site or in HPSP parking lots near to the site under Alternative 6, pedestrian impacts would be lessened since impacts associated with pedestrians crossing arterial streets would not be expected to be significant. This could also potentially lessen eventgoer confusion regarding where they should park and reduce local circulation.

Construction impacts on traffic were determined to be significant for the Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the Project at the Alternative 6 site would be internal to the HPSP area and would not involve temporary lane closures along arterial streets. Therefore, construction impacts for Alternative 6 would be less severe than those for the Project.

Under Alternative 6, it is anticipated that events at the NFL Stadium and the Project would be subject to a mutually-agreed schedule to reduce transportation impacts. Concurrent Event Scenario 2 (major event at Project and Football Game at NFL Stadium) and Scenario 5 (major events at Project and The Forum and Football Game at NFL Stadium) as analyzed in Section 3.14, Transportation and Circulation, may still occur, as those scenarios envisioned a football game on a weekend afternoon and events at the Project and The Forum during a weekend evening. Impacts associated with these scenarios would not be reduced. Concurrent Event Scenario 3 (major event at Project and Midsize Event at NFL Stadium) and Scenario 4 (major events at Project and The Forum and Midsize Event at NFL Stadium), however, would not occur as those scenarios envision events in the NFL Stadium and at the Project at the same time with concurrent arrival and departure patterns. The impacts associated with these scenarios would not occur and alternative off-site remote parking would not be required for the Project. If concurrent events were to occur in the separate 6,000-seat performance venue under construction at HPSP, impacts on the transportation system would be reduced from those anticipated for Concurrent Event Scenarios 3 and 4. Although concurrent events transportation impacts may be reduced based on an enhanced level of schedule coordination between the operators of the NFL Stadium and the Alternative 6 arena, discussed above, concurrent events between those two venues could take place and concurrent events with The Forum would still occur, and therefore the identified concurrent event significant and unavoidable impacts for the Project would remain so under Alternative 6.

Because the frequency with which concurrent events occurs would be reduced, the likelihood of impacts to emergency access during concurrent events would be correspondingly reduced, but would remain significant and unavoidable during concurrent events.

### **Utilities and Service Systems**

Under Alternative 6, utility demands on the HPSP Alternative site would decrease as the hotel use would be eliminated. Due to the elimination of the hotel, water demand of Alternative 6 would be approximately 20 percent lower than under the Project. Wastewater generation of Alternative 6 would be about 3 percent lower than under the Project. Solid waste generation of Alternative 6 would be approximately about 4 percent lower than under the Project.<sup>49</sup> As a result, impacts with respect to water supply (Impacts 3.15-2

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<sup>49</sup> Memorandum – IBEC Alternative 6 – Wastewater & Solid Waste Generation, August 23, 2019.  
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and 3.15-4), wastewater treatment capacity (3.15-5, 3.15-7), and solid waste disposal capacity (3.15-11 and 3.15-13) would be less than significant under both the Project and Alternative 6.

The existing off-site storm drain system in the area of the HPSP Alternative site has been planned with major infrastructure to accommodate development throughout the 238-acre HPSP area. This is contrasted with the Project Site, which may not have sufficient capacity to handle post-construction stormwater runoff from the Project (Impacts 3.15-9 and 3.15-10). Thus, the impacts related to stormwater drainage and runoff would potentially be less than significant, but Alternative 6 would still require implementation of Mitigation Measures 3.15-9 and 3.15-10. Impacts related to stormwater drainage would likely be less severe than those described for the Project, but would still require mitigation.

#### ***Impacts Identified as Being More Severe than the Project***

There are no impacts of Alternative 6 that were identified which would be more severe than those described for the Project.

#### **Basis for Finding**

Alternative 6 (Hollywood Park Specific Plan Alternative Site) would avoid or lessen some impacts associated with the Project; however, this alternative would not further some of the key City objectives related to transforming vacant or underutilized land within the City into compatible land uses within aircraft noise contours (City objective 5). Development of the Hollywood Park Specific Plan Alternative within the HPSP area would also displace uses planned under the Hollywood Park Specific Plan Alternative site to other portions of the HPSP area, and there is not enough space within the HPSP area to accommodate these displaced uses. (ESA Alternatives Memo, p. 22.) Furthermore, due to limited number of parking spaces at the Hollywood Park Specific Plan Alternative Site, and the likely need for off-site parking spaces within the HPSP area, it is foreseeable that under Alternative 6 events at the arena and stadium could not overlap; events at the arena would have to be scheduled when the stadium is not in use, thus potentially resulting in fewer events at the arena. (*Id.* at p. 23.)

In addition to the above, Alternative 6 would not further some of the project applicant's objectives. In addition to the need for site acquisition, the proposed arena and associated development would require a complete redesign, including necessary NBA review and approval, along with review and approval through the City Inglewood, including preparation of a new CEQA document to support changes to the Hollywood Park Specific Plan. The need to restart the planning and entitlement process would impede the ability to meet the project applicant's objectives related to hosting LA Clippers home games in the 2024–2025 season.

The Alternative 6 site does not meet the definition of "project area" included in Public Resources Code section 21168.6.8(a)(5). Thus, Alternative 6 would not meet the requirements for compliance with AB 987. Due to this change, should the adequacy of the EIR be litigated, rather than the AB 987 dictated 270-day process for legal proceedings, including any potential appeals, the project would be subject to the established legal process which can take three or more years. This more extended legal process would likely obstruct the ability to meet the applicant's schedule objective to open in time for the 2024-2025

NBA season. In addition, because AB 987 would not apply at this site, there would be a loss of environmental benefits because the measures that the project applicant has committed to as a part of the Greenhouse Gas reduction plan would not be implemented. (ESA Alternatives Memo, p. 24.)

Alternative 6 is also found to be infeasible for the following, additional reasons:

- Given the extensive planning that has been devoted to the Hollywood Park Specific Plan, and the effort that went into obtaining the approval of these entitlements, it is unknown if the site is available for purchase or if the owner of the site would be willing to sell to the project applicant.
- Development of the Hollywood Park Specific Plan Alternative within the HPSP area would displace uses planned under the Hollywood Park Specific Plan Alternative site to other portions of the HPSP area, and there may not be sufficient space within the HPSP area to accommodate these displaced uses. There would be limited space for a plaza at the entrance to the Arena. Crowds could spill into the adjacent HPSP area.
- Under Alternative 6, the proposed Project Site would not be developed as under the Proposed Project. Similar to the No Project Alternative, the Project Site would remain vacant and underdeveloped. Alternative 6 would be inconsistent with the obligation to use best efforts to redevelop the area for airport-compatible uses, as specified in grant agreements under the FAA AIP program. Alternative 6 would also be inconsistent with the City's objective to "transform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City."

(ESA Alternatives Memo, pp. 22-23.)

The City Council rejects Alternative 6 (Hollywood Park Specific Plan Alternative Site) on each of these grounds independently. All of the reasons provide sufficient independent grounds for rejecting this alternative.

### **Finding**

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible Alternative 6.

## **7. Alternative 7: The Forum Alternative Site**

### **Description**

Under Alternative 7, elements of the Project would be developed on an approximately 28-acre site currently occupied by the historic Forum concert and event venue (the Forum Alternative site), located approximately 0.8 miles north of the Project Site at 3900 West Manchester Boulevard in the City of Inglewood (see Figure 6.6). As with the Project, Alternative 7 would involve the construction of a new

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multi-purpose arena to serve as the home of the NBA LA Clippers basketball team and as much of the related development included in the Project as feasible, including the relocation of the LA Clippers team offices and team practice and athletic training facility.

The focus of this alternative is to identify the impacts that would occur if the arena and related uses, including the ancillary plaza uses and the same amount of on-site parking, are developed on the Forum Alternative site to potentially avoid or substantially lessen one or more significant environmental impacts of the Project, including the transportation-related impacts associated with concurrent events at the existing Forum venue and the Project.

The Forum Alternative site is currently developed with an historic concert venue known as The Forum, which has hosted sporting and entertainment events in the City since 1967 and is listed on both the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register). As discussed further in this section below, the development of a modern arena that meets NBA standards on the Forum Alternative site would require ~~that the Forum Alternative site would be available and could be acquired by the project applicant, and the~~ demolition of the existing Forum building. If the existing Forum building were to be demolished, Alternative 7 would include sufficient land to potentially accommodate the uses included in the Project.

Alternative 7 would involve the development of the same or substantially similar components of the Project on approximately 28 acres currently occupied by the historic Forum concert and event venue and ancillary structures and surface parking. The Forum Alternative site would be approximately 68 percent larger than the Project Arena Site (and approximately the same size as the total Project Site). As such, the Forum Alternative site could accommodate a program of development similar to the Project, although the hotel and well relocation components would not be included and the ancillary uses and parking would be configured differently.

The Forum Alternative site is currently zoned C-R Commercial Recreation. Areas to the east and west of the Forum site are zoned R-2 Residential Limited Multi Family, Open Space, R-1 Residential Single Family, and C-R Commercial Recreation. Uses in the immediate vicinity of the Forum site include the Inglewood Park Cemetery to the north, residential and commercial uses to the west across South Prairie Avenue, and the residential community known as Carlton Square to the east across Kareem Court. The HPSP area is located immediately to the south of the Forum Alternative site, across Pincay Drive.

### ***Existing Forum Building***

The Forum Alternative site is currently developed with the historic Forum concert and event venue. The Forum is an approximately 350,000 sf arena that opened in 1967 and until 1999 was the home of the NBA Los Angeles Lakers, the NHL Los Angeles Kings, and the WNBA Los Angeles Sparks, and hosted other major sporting events and other athletic competitions, concerts, and events. In 1999 and 2000, all three professional sports teams left Inglewood and moved to the then-new Staples Center in downtown Los Angeles.

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The Forum was acquired in 2000 by the Faithful Central Bible Church, which used it for occasional church services and leased it for sporting events, concerts and other events. In 2012, the Forum was purchased by Madison Square Garden Company and underwent comprehensive renovation and rehabilitation that included structural, aesthetic, and amenity improvements completed in 2014 to convert the Forum into a world-class concert and event venue. On September 24, 2014, the Forum was listed on the National Register of Historic Places and the California Register of Historic Resources as an architecturally significant historic place worthy of preservation. The renovation of the Forum was funded in part by federal tax credits for its restoration as a National Register-listed building and an \$18 million loan from the City of Inglewood for the restoration and rehabilitation of the structure.

The Forum, as renovated to function as a concert and event venue and listed on the National Register and the California Register, is substantially smaller than, and does not include the features and amenities provided in, modern NBA arenas. Constructed in 1967, The Forum structure stands at approximately 350,000 sf. By comparison, current NBA arenas range in size from approximately 586,000 sf to over 1 million sf, with the average of the three most recently-constructed arenas exceeding 700,000 sf. The relatively small size of The Forum would make the use of the structure to serve as the home arena of an NBA team infeasible because the structure lacks sufficient space for the range of vendors, food and drink establishments, luxury boxes and loge seating options, and other amenities required for a contemporary NBA home arena.

A conversion of The Forum from a concert and event venue to a modern home arena for an NBA team with related facilities would require extensive alterations to the historic structure, and a substantial increase in size. At a minimum, required modifications would likely include, but not be limited to, the demolition and expansion of exterior walls and the roof of The Forum structure to accommodate the facilities and amenities required for a contemporary NBA arena such as a modern scoreboard, standard and premium seating, and sufficient concourse areas, clubs and locker rooms, food and beverage preparation and service areas, and other facilities. Even assuming such alterations were structurally feasible and any part of the original structure could be retained or repurposed, these changes would remove or substantially alter the character defining features of The Forum that make it eligible for listing on the National Register and California Register.

In addition, the other components of the Project, including the team office space, team practice and athletic training facility, sports medicine clinic, and the ancillary retail, dining, and community uses would likely not be feasible to accommodate within the Forum structure. Therefore, additional structures around the Forum would be required to accommodate those uses, obscuring or altering views of the Forum. These alterations would materially and adversely alter the “central location on an open site with high visibility from adjacent streets and properties” of The Forum, which is one of the character-defining features for which the building is listed on the National Register and California Register.

In summary, it does not appear that the renovation, rehabilitation, or expansion of The Forum to function as a modern NBA arena would be feasible. Even if it were, it could not be accomplished without a significant adverse effect on an historic resource. Thus, Alternative 7 evaluates the demolition of The Forum and the redevelopment of the site with the components of the Project. While demolition of the

Forum building is the only feasible manner to accommodate the development of a modern NBA arena and other components of the Project on the Forum Alternative site, ~~were the site to become feasibly available for acquisition by the project applicant,~~ the effects of removal of The Forum would be subject to a policy determination for decision makers.

### ***Forum Alternative Characteristics***

Similar to the Project, development under Alternative 7 would include the Arena Structure, including an approximately 915,000 sf arena to host LA Clippers NBA games and other events, the LA Clippers team offices (71,000 sf), the LA Clippers practice and training facilities (85,000 sf) and a sports medicine clinic (25,000 sf). Seating capacity of the arena under Alternative 7 would remain at 18,000 attendees for LA Clippers basketball games and a maximum capacity of up to 18,500 attendees for concert events.

The overall design of the main Arena Structure under Alternative 7 would be substantially similar to the Project, though oriented differently, with the main arena lobby entrance opening to the south onto a pedestrian plaza located at the corner of South Prairie Avenue and Pincay Drive with portions extending to the corner of South Prairie Avenue and Manchester Boulevard, as shown in Figure 6.6. As in the design included in the Project, the height of the main Arena Structure and appurtenances would extend up to 150 feet above grade, with the event level of the arena at approximately 30 to 35 feet below grade. The pedestrian plaza would be bound to the west by the arena structure and structured parking. The ancillary retail, dining, and multipurpose space for community programming uses would be included in separate structures within the plaza.

Similar to the Project, a total of 4,125 parking spaces as required by the City of Inglewood Municipal Code would be provided within the Forum site. As shown in Figure 6.6, these majority of the on-site parking spaces would be provided in a 3,525-space parking structure to the north of the main Arena Structure, with the remaining spaces provided in surface parking around the main Arena Structure and a limited amount of subterranean structured parking. Alternative 7 would not include a hotel or a construction of a new municipal water well to replace the well within the Project Site.

Access to the Forum Alternative site would utilize some of the existing access points to the site, including those from West Manchester Boulevard, South Prairie Avenue, Pincay Drive and Kareem Court. The on-site parking structure would be accessed from South Prairie Avenue and West Manchester Boulevard, with access to surface parking provided from Pincay Drive.

Regional access to the Forum Alternative site would be similar to but slightly different than access to the Project Site. Access to the Forum Alternative site is provided by the San Diego Freeway (I-405), located approximately 1.7 miles to the west, and the Glenn Anderson Freeway & Transitway (I-105), approximately 1.8 miles to the south, and the Harbor Freeway (I-110), approximately 3.4 miles to the east. Local access to the Forum Alternative site would be similar to access to the existing concert and event venue provided by several major arterials, including South Prairie Avenue and Manchester Boulevard with alternative connections to Florence Avenue, Hawthorne Boulevard, Crenshaw Boulevard and Arbor Vitae Street.



Transit access to the Forum Alternative site is provided by several bus lines and the future Crenshaw/LAX light rail line. The closest public transit stops are bus service stops located along the West Manchester Boulevard frontage of the Forum Alternative site, including a stop serving the Metro 115 bus line, and a bus stop located at the southwest corner of South Prairie Avenue and West Manchester Boulevard serving the Metro 115, 211, and 442 lines. The nearest rail transit stop that would serve the Forum Alternative site would be the Crenshaw/LAX light rail line Downtown Inglewood station currently under construction approximately 1.3 miles away by surface streets.

If Alternative 7 were developed, it is anticipated that the ownership of the properties within the Project Site would not change, private property would not need to be acquired for development of the proposed uses, and none of the uses that presently occupy the Project Site would be relocated. Similarly, the vacation of West 101st Street and West 102nd Street would not be required.

~~The Forum Alternative is a privately owned property subject to a Development Agreement between the City and The Forum property owner. There is, therefore, substantial uncertainty regarding site control and the feasibility of this alternative. The development of Alternative 7 could require amendments to the Commercial Recreation zoning and land use designations to accommodate the Alternative 7 development within the site.~~

#### **Relationship to Project Objectives**

**Comment [U10]:** Suggest deleting; this is confusing and design/entitlements process is already described below.

The Forum Alternative would meet some of City's objectives for the Project. The Forum Alternative would meet the City's goals of becoming a regional sports and entertainment center (City Objective 1) and stimulating economic development (City Objective 2), however because this alternative would involve demolition of an existing entertainment venue, The Forum, in order to build a new sports and entertainment venue of similar size, it would not achieve these goals to the same extent as the Project. As explained above, The Forum site is currently developed with a large entertainment venue, and while there are surrounding surface parking lots that can be seen as underdeveloped, the Forum Alternative site is not underutilized to the same degree as the Project Site. Because City Objective 5 is to "[t]ransform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City," Alternative 7 would not be as responsive to this objective as the Project. Finally, because the Forum Alternative would result in a new significant and unavoidable impact as a result of the demolition of the historic Forum building, it would be less responsive than the Project to City Objective 10, which calls for the project objectives to be achieved "in an expeditious and environmentally conscious manner."

The Forum Alternative would meet most but not all of the project applicant's objectives for the project. Because the Forum Alternative would first require ~~feasibly acquiring the site, the proposed arena and associated development would require a complete redesign, including necessary NBA review and approval, along with review and approval through the City of Inglewood, including preparation of a new CEQA document, there is substantial uncertainty regarding the feasibility of site control and whether~~ Alternative 7 would allow the applicant to begin hosting LA Clippers home games in the 2024–2025

season. (ESA Alternatives Memo, p. 23.) For this reason, the Forum Alternative could be unable to meet project applicant Objective 1a.

### **Comparative Impacts**

Table 6-2 at the end of Chapter 6.0, Alternatives, of the EIR has an impact-by-impact comparison of the significant impacts of the Project and Alternative 7.

### ***Impacts Identified as Being the Same or Similar to the Project***

Because the type and amount of development as well as the size of the arena would be essentially the same as the development in the Project, many of the impacts of the Project that would be affected by the intensity of development would remain the same or would be very similar at the Forum Alternative site.

### **Aesthetics**

The nearest shadow sensitive uses are residences located across Kareem Court, approximately 75 feet to the east, and residences located on East Nutwood Street, across South Prairie Avenue about 190 feet to the west. With the addition of Alternative 7 at this location, the height of proposed structures and the distance between those structures and nearby shadow sensitive receptors would result in shadows affecting adjacent properties to the east in afternoons in December that would not exceed the threshold of three hours of new shadow. Morning shadows, to the west, would not reach the shadow sensitive receptors across South Prairie Avenue. Therefore, like the Project, the shadow impacts (Impact 3.1-3) of Alternative 7 would be less than significant.

### **Biological Resources**

A number of mature landscape trees are located around the Forum structure, and street trees are present in the landscape strip along South Prairie Avenue, West Manchester Boulevard, and Kareem Court, adjacent to the Forum Alternative site. As a result, like the Project, Alternative 7 could disturb nesting raptors or migratory birds (Impact 3.3-2) and result in the loss of protected trees (Impact 3.3-3). Mitigation Measures 3.3-2 and 3.3-3 would be required to reduce these impacts by protecting these resources during construction. As a result, impacts on nesting raptors or migratory birds and protected trees would be similar to those described for the Project.

### **Cultural Resources**

The Forum was originally developed in 1966–67, before State and federal laws that protect historic and archaeological resources were in force.<sup>50</sup> Like the Project Site, there are no known archaeological resources located on the Forum Alternative site. However, it is possible that development on the Forum Alternative site could disturb buried archaeological resources and unknown human remains. Therefore, it is possible that, like with the Project, implementation of Alternative 7 could cause a substantial adverse

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<sup>50</sup> The National Historic Preservation Act was enacted in 1966, and related regulations were not adopted and in force at the time of the development of the Forum. CEQA was passed in 1970, and the California Office of Historic Preservation was opened in 1975.

change in the significance of unknown historic, archaeological, or tribal cultural resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-5, 3.4-6, and 3.4-7), and/or unknown human remains (Impacts 3.4-4 and 3.4-8). Mitigation Measures 3.4-1 and 3.4-4 would reduce these impacts by requiring that work stop if such resources are uncovered, and that the resources be appropriately evaluated and treated. Therefore, impacts on archaeological resources, and human remains would be similar to the Project.

### **Geology and Soils**

Impacts related to geology and soils conditions and hazards, including paleontological resources would be similar to those described for the Project. Because The Forum Alternative would occur less than one-half mile from Project Site, the geological and soils conditions that would be encountered in construction of the Forum Alternative would be essentially the same as with the Project. The Potrero Fault, which is approximately one-half mile from the Project Site, is closer to the Forum Alternative site, approximately one-quarter mile to the east; however, compliance with the California Building Code would avoid the creation of seismic hazards. Because there would be a similar amount of ground-disturbing activity in Alternative 7, the potential for erosion and accidental discovery of paleontological resources would be correspondingly similar (Impacts 3.6-2 and 3.6-4). These impacts would continue to be potentially significant under the Forum Alternative and would require the same mitigation measures as identified for the Project in order to reduce the impact to less than significant.

### **Hazards and Hazardous Materials**

The Forum Alternative site is listed twice on the GeoTracker database maintained by the State Water Resources Control Board for releases of diesel found in subsurface soil. Both cases involved leaking underground storage tanks, one reported in 1986 and the other reported in 2004; both cases have been subsequently closed.<sup>51</sup> However, it is possible that previously contaminated soils may still remain on the Forum Alternative site, and thus, as with the Project, construction workers could be exposed to contamination during ground disturbing activities (Impact 3.8-4). Mitigation Measure 3.8-4 would require the preparation and approval of the Soil Management Plan prior to initiating earthwork activities, which would reduce the potential for worker exposures. For this reason, impacts related to on-site contamination would be similar to the Project.

Similar to project site, the Forum Alternative site is located within the planning boundary/airport influence area (AIA) established for LAX in the Los Angeles County Airport Land Use Plan (ALUP). Compared to the Project Site, the additional distance between the Alternative 7 site and the Hawthorne Airport (HHR) would mean that the arena structure at the Alternative 7 site would not penetrate the HHR horizontal imaginary surface, but construction cranes for the arena would continue to penetrate the HHR horizontal surface. In addition, the arena construction cranes would penetrate both the HHR horizontal and notification surfaces. As a result, hazards to air navigation (Impact 3.8-5) under Alternative 7 would be the same as the Project. Mitigation Measure 3.8-5 would reduce this impact by requiring the project applicant to notify the FFA and complete an aeronautical study to determine whether the Project would constitute a hazard to air navigation, to implement all actions required by the FAA to avoid the creation of

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<sup>51</sup> State Water Resources Control Board, 2019. GeoTracker database. Accessed: May 9, 2019.  
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a hazard to air navigation, and to submit to the City a consistency determination from the ALUC. As a result, hazards to air navigation would be similar to the Project.

### **Hydrology and Water Quality**

The Forum Alternative site is fully developed with impervious surfaces; pervious surfaces on the site are minimal and include small planters with ornamental landscaping and street frontage landscape strips. Sheet flow stormwater runoff on the Forum Alternative site is managed by an existing system of storm drains. As a result, it is possible that construction and operation of Alternative 7 could cause water quality discharges that are not consistent with SWRCB objectives and could degrade the quality of the water that is discharged from the Forum Alternative site (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4). Altered drainage patterns during both construction and operation on the site would also have the potential to result in erosion, sedimentation, and/or flooding on or off site by redirecting or concentrating flows (Impact 3.9-3 and 3.9-6). In order to lessen the significance of these impacts for Alternative 7, like the Project, Mitigation Measure 3.9-1(a) would require the project to comply with a number of regulations governing water quality and drainage while Mitigation Measure 3.9-1(b) would require the periodic sweeping parking lots during operation to remove contaminants. Therefore, impacts related to water quality and drainage would be similar to the Project.

### **Land Use and Planning**

Like the Project, Alternative 7 would not result in the division of an established community, as the arena and other uses would be located entirely within the Forum Alternative site; the vacation of streets would not be required (Impacts 3.10-1 and 3.10-3). The City of Inglewood designates the western third of the Forum Alternative site, along South Prairie Avenue, as Commercial/Residential while the remainder of the site is designated as Commercial/Recreation. As described above, the development of Alternative 7 could require amendments to the Commercial Recreation zoning and land use designations to accommodate the Alternative 7 development within the site. With such amendments, Alternative 7 would be consistent with plans or policies that have been adopted for the purposes of environmental mitigation, and thus it would have less-than significant impacts related to land use and planning (Impacts 3.10-1 through 3.10-4). As a result, impacts related to land use and planning would be similar to the Project.

### **Noise and Vibration**

Construction noise levels generated under Alternative 7 would be similar to the Project due to the use of similar amounts of equipment and construction methods. Because noise sensitive receptors would be located similar distances from the Forum Alternative site as the Project Site, impacts associated with a temporary increase in noise during construction (Impacts 3.11-1 and 3.11-5) would be similar to the Project, and would still require the implementation of measures and controls to reduce noise during construction (Mitigation Measure 3.11-1); construction noise impacts would remain significant and unavoidable. In addition, vibration levels under Alternative 7 would also be similar to the Project for the same reasons. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-7) would be similar, and would still require the implementation of Mitigation Measures 3.11-3(a) through (c), which requires minimum distances of construction equipment from

sensitive receptors and the designation of a construction relations officer to field vibration-related complaints.

Traffic generated under Alternative 7 would be similar to the Project, but the location of the Forum Alternative site about 0.8 miles north of the Project Site would distribute these impacts across the transportation system slightly differently. Thus, the impact associated with a permanent increase in noise during operation (Impacts 3.11-2 and 3.11-6) would still require the implementation of Mitigation Measure 3.11-2(b), which would require the implementation of a Transportation Demand Management (TDM) program (Mitigation Measure 3.14-2(b)), and, like with the Project, would remain significant and unavoidable. As discussed above, the Forum Alternative site is located within the planning boundary/AIA established for LAX in the Los Angeles County ALUP, and the planning boundary/AIA is based in part on the 65 dBA CNEL contour included in the ALUP. Similar to the Project, the Arena and ancillary uses under Alternative 7 would generally be compatible with uses permitted on the site by the ALUP, and standard building construction practices for commercial structures would typically reduce interior noise levels to acceptable levels although some level of additional insulation may be appropriate, especially for the proposed medical clinic (Impacts 3.11-4 and 3.11-8). As a result, impacts related to aircraft noise would be similar to the Project.

### **Population, Employment and Housing**

The implementation of Alternative 7 would result in the loss of existing jobs at The Forum, however new event related jobs would be created and could be occupied by current Forum employees. Impacts related to Population, Employment and Housing (Impacts 3.12-1 through 3.12-4) would remain less than significant under Alternative 7, although employment generation on the Forum Alternative site would be reduced as the existing jobs at the Forum would be eliminated and no hotel would be constructed.

### **Public Services**

Because impacts of the Project on public services, including fire and police protection, parks and recreation facilities, and public schools would be largely driven by event activity at the proposed arena, these impacts would remain largely unchanged and would continue to be less than significant (see Impacts 3.13-1 through 3.13-12) under Alternative 7. It should be noted that major events already occur at the Forum Alternative site throughout the year. Alternative 7 would likely increase the number of events that take place at the site, somewhat increasing the demands on police, fire, and parks services, because the existing Forum building would be demolished, the total demand for public services would be somewhat lower than under the Project.

Because employment on the Forum Alternative site would be reduced somewhat under Alternative 7, impacts on public schools (Impacts 3.13-11 and 3.13-12), already less than significant for the Project, would be slightly further reduced under Alternative 7. The arena and commercial uses under Alternative 7 would be expected to generate a total of 49 new school students, a reduction of 1 elementary school student compared to the 50 students under the Project as described in Table 3.13-9.

### Utilities and Service Systems

The existing storm drain system in the area of the Forum Alternative site may not have sufficient capacity to handle post-construction stormwater runoff from each site (Impacts 3.15-9 and 3.15-10). In order to lessen the significance of these impacts for Alternative 7, like the Project, Mitigation Measures 3.15-9 and 3.15-10 would require the project to comply with a number of regulations governing water quality and drainage (Mitigation Measure 3.9-1(a)). As a result, impacts related to stormwater drainage would be similar to the Project.

### Transportation and Circulation

Alternative 7 would be of similar size to the Project, with a similar level of access to rail transit via shuttles for major events. As such, it is anticipated that vehicle trip generation for arena events and ancillary uses at the Alternative 7 site would be similar to that for the Project. This alternative would therefore be expected to have intersection and freeway facility impacts similar to those described for the Project, although the location of the Forum Alternative site about 0.8 miles north of the Project Site would distribute these impacts across the transportation system slightly differently. For example, more traffic and greater levels of congestion would occur along the Manchester Boulevard corridor, and less traffic and reduced levels of congestion would occur along the West Century Boulevard corridor.

Given that the Alternative 7 arena would have a capacity of 18,000 for NBA games and 18,500 for concerts and The Forum has a capacity of 17,500, the increased capacity of a sold out event at this location would generate more person trips; however, the implementation of a shuttle system to rail transit (which is not provided for events at The Forum currently) could mean that vehicle trip generation and impacts would be slightly reduced from the trips and impacts generated by existing events currently occurring at The Forum.

The Alternative 7 site is located about 0.8 miles from the Project Site, and thus the VMT characteristics of this alternative would be essentially the same as those of the Project. The event and retail components of Alternative 7 would have significant VMT impacts similar to those for the Project. The office, practice facility, sports medicine, and restaurant components of Alternative 7 would have less than significant VMT impacts similar to those for the Project.

Similar to the Project, Alternative 7 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic.

The amount of on-site parking under Alternative 7 would be similar to that for the Project, meaning that a substantial amount of parking (roughly 3,700 to 4,100 spaces for a major event) would still need to be provided off site, presumably at the HPSP as for the Project (and as for The Forum currently). As such, impacts associated with pedestrians crossing streets to walk to/from the parking could be similar to the Project.

The Alternative 7 site is located approximately two-thirds of a mile from the Centinela Hospital Medical Center. Impacts of the Project-related congestion on emergency access would generally be similar to those for the Project.

Construction impacts on traffic were determined to be significant for the Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the Project at the Alternative 7 site would likely involve temporary lane closures along the Manchester Boulevard frontage of the site for construction of a parking garage, and could also involve temporary closure of the lane along the South Prairie Avenue frontage for some portion of the construction period. Therefore, construction impacts for Alternative 7 would be similar to those for the Project.

### ***Impacts Identified as Being Less Severe than the Project***

#### **Aesthetics**

The nearest light or shadow sensitive uses are residences located across Kareem Court, approximately 75 feet to the east, and residences located on East Nutwood Street, across South Prairie Avenue about 190 feet to the west. Under this alternative, the parking uses along Kareem Court would be unlikely to result in significant light impacts in the Carlton Square residences across Kareem Court. With the addition of Alternative 7 at this location, the distance to sensitive receptors to the west, across South Prairie Avenue, reduces the potential for outdoor lighting, building façade lighting, and illuminated signage on the arena and/or parking structures that would face the residences to result in light levels in excess of the significance threshold (Impacts 3.1-2 and 3.1-5). Thus, impacts related to spillover lighting would be less than the impacts of the Project on adjacent sensitive receptors, and Mitigation Measures 3.1-2(a) through (c) would not be required for Alternative 7.

#### **Air Quality and GHG**

Air Quality and GHG emissions during operation under Alternative 7 would decrease as the existing Forum structure would be demolished and planned hotel on the East Transportation and Hotel Site and the new potable water well would be eliminated. In addition, the new arena on the Forum Alternative site, built to be consistent with current Title 24 requirements, would be more energy efficient than the existing Forum building, which was renovated in 2012 and can be expected to be consistent with prior versions of Title 24. Because the existing Forum building would be demolished, compared to the Project, fewer of the events that occur at the Alternative 7 arena would be net new; with over 100 events per year occurring at the Forum, and 47 of the anticipated 49 LA Clippers games currently taking place at Staples Center, more than 150 of the events that would occur at the Alternative 7 arena are already taking place in the air basin.

Similar to the Project, Alternative 7 would conflict with implementation of the applicable air quality plans, as operational emissions associated with the alternative, though reduced compared to the Project, would still exceed thresholds established by the SCAQMD for criteria air pollutants (Impact 3.2-1 and 3.2-5). Impacts associated with net new emissions of criteria air pollutants (Impacts 3.2-2 and 3.2-6) and GHG emissions (Impact 3.7-1 and 3.7-2) during operation would be reduced compared to the Project. Nevertheless, Alternative 7 would still require the implementation of Mitigation Measure 3.2-2 (a), which would require the implementation of a Transportation Demand Management (TDM) program (Mitigation Measure 3.14-2(b)); Mitigation Measure 3.2-2(b), which would require the testing of the emergency generators and fire pump generators on non-event days; Mitigation Measure 3.2-2(c), which would require the preparation and implementation of a Construction Emissions Minimization Plan; Mitigation Measure 3.2-2(d), which would require the project applicant to encourage the use of zero- and near-zero

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

### **Energy Demand and Conservation**

Energy demand during operation under Alternative 7 would be less than the Project as this alternative would involve demolition of the existing Forum building and would not include the planned hotel on the East Transportation Site or a new potable water well Impacts (3.5-2 and 3.5-4).

### **Noise and Vibration**

Under Alternative 7 the outdoor stage would be positioned between the retail buildings to the south of the Arena. As a result, the impact due to operational sound from outdoor plaza events (Impacts 3.11-2 and 3.11-6) would be reduced as the amplified noise would be channeled by the retail buildings and directed to the south across Pincay Drive toward the NFL stadium and thus away from sensitive receptors to the west and east. Implementation of Mitigation Measure 3.11-2(a), which would require the preparation of an operations noise reduction plan, would still be required. Taken together, operational noise impacts would remain significant and unavoidable, although likely reduced somewhat from the Project.

Traffic generated under Alternative 7 would be similar to the Project, but because there would be a lesser potential for the occurrence of concurrent events, and no overlapping events with the Forum and no potential for concurrent events at The Forum, NFL Stadium, and Project, Alternative 7 would result in less overall traffic on the local roadway network during the highest peak conditions. Thus, the impact associated with a permanent increase in noise during operation (Impacts 3.11-2 and 3.11-6) would be reduced, would still require the implementation of Mitigation Measure 3.11-2(b), which would require the implementation of a Transportation Demand Management (TDM) program (Mitigation Measure 3.14-2(b)), and would remain significant and unavoidable, like with the Project.

### **Transportation and Circulation**

The Project at the Alternative 7 site could have a reduced level of impact on existing neighborhood streets since a grid network of residential streets only exists to the west of South Prairie Avenue and not to the east, north, or south of the Forum Alternative site.

The elimination of the hotel use would avoid the significant VMT impact identified for the Project's hotel use.

Alternative 7 would not be able to accommodate the total number of combined events anticipated to occur at the Project and all of the events that currently occur at The Forum. Therefore, there would be a reduction in the net new Project-generated VMT on event days when there would otherwise have been an event at The Forum. To the extent that some existing events at The Forum are displaced and move to other venues in the region, there could be a reduction in regional VMT if such events are moved to a location with higher non-auto mode splits and shorter trip lengths (such as Staples Center) or to locations



with a smaller capacity (such as the Hollywood Bowl). The event-related VMT impacts, however, would still be significant.

Under Alternative 7, no concurrent events could occur involving events at the Project and events at The Forum. Therefore, impacts identified in Section 3.14 for Concurrent Event Scenario 1 (major events at Project and The Forum), Scenario 4 (major events at Project and The Forum and Midsize Event at NFL Stadium), and Scenario 5 (major events at Project and The Forum and Football Game at NFL Stadium) would be avoided. There would be no potential for concurrent events to occur in all three facilities (Project, The Forum, and NFL Stadium). Although transportation impacts associated with concurrent events would generally be reduced because Alternative 7 would preclude events at the Project and The Forum from occurring simultaneously, concurrent events with the NFL Stadium would still occur, and therefore the identified concurrent event significant and unavoidable impacts for the Project would remain so under Alternative 7.

Because the frequency with which concurrent events occur would be reduced because concurrent events at The Forum and at the Project would no longer occur, the likelihood of impacts to emergency access during concurrent events would be correspondingly reduced, but would remain significant and unavoidable during concurrent events.

#### **Utilities and Service Systems**

Under Alternative 7, the existing Forum building would be demolished and the proposed hotel use would be eliminated, reducing the net new energy demand from Alternative 7 compared to the Project. Due to elimination of the proposed hotel, water demand of Alternative 7 would be approximately 20 percent lower than under the Project. Wastewater generation of Alternative 7 would be about 3 percent lower than under the Project. Solid waste generation would be approximately about 4 percent lower than under the Project.<sup>52</sup> As a result, impacts with respect to water supply (Impacts 3.15-2 and 3.15-4), wastewater treatment capacity (3.15-5, 3.15-7), and solid waste disposal capacity (3.15-11 and 3.15-13) would be reduced compared to the Project, and would remain less than significant under both the Project and Alternative 7.

#### ***Impacts Identified as Being More Severe than the Project***

##### **Aesthetics**

The Forum Alternative site would be developed with a visually more intensive level of development compared to existing conditions, with a larger arena structure, and other parts of the site which are currently surface parking lots developed with multi-story commercial and parking structures. Like the Project Site, the Forum Alternative site is located in an urbanized area, and the area in the vicinity of the does not have any scenic vistas, and in this regard visual impacts associated with Alternative 7 would be similar to those described for the Project (Impacts 3.1-1 and 3.1-4), although the changes to views north and south on South Prairie Avenue that would result from the construction of the Project pedestrian bridge would not occur under this alternative. However, the historic Forum building is a unique visual

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<sup>52</sup> Memorandum – IBEC Alternative 7 – Wastewater & Solid Waste Generation, August 23, 2019.  
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feature in the area, and its demolition and removal would be considered a significant degradation of the visual character in this part of Inglewood. Mitigation measures to address this impact would be the same as those described under Cultural Resources, below. However, because Alternative 7 necessitates the complete demolition and removal of the historic Forum building, this impact would be significant and unavoidable.

### **Cultural Resources**

As described above, the Forum Alternative site is currently developed with The Forum, a National Register of Historic Places and California Register of Historical Resources-listed concert and event venue. The Forum was opened in 1967 and hosted major sporting events and other athletic competitions, concerts, and events, and until 1999 was the home of the NBA Los Angeles Lakers, the NHL Los Angeles Kings, and the WNBA Los Angeles Sparks, when all three professional sports teams left Inglewood and moved to the then-new Staples Center in downtown Los Angeles.

The Forum underwent comprehensive renovation and rehabilitation, completed in 2014, that included structural improvements to convert The Forum into a world-class concert and event venue. Also in 2014, The Forum was listed on the National Register of Historic Places and the California Register of Historic Resources as an architecturally significant historic property. As such it is an historical resource for the purposes of CEQA.

Under Alternative 7, The Forum would be demolished and elements of the Project would be developed on the 28-acre site. Demolition of an historical resource is considered a significant impact under CEQA. Demolition of an entire resource cannot be fully mitigated, and the impact would be considered to be significant and unavoidable. CEQA requires that feasible mitigation measures be prescribed. The following feasible mitigation measures would reduce impacts:

- **HABS Documentation** – HABS Documentation shall be completed for The Forum prior to any demolition activities. The work shall be completed by a qualified architectural historian and photographer with experience in HABS Documentation.
- **Display** – The project applicant shall work with the City to develop displays for the new facility that tell the history of The Forum, including text and photographs. The displays shall be installed prior to the new facility being opened to the public.
- **Salvage Plan** – The project applicant shall hire a qualified professional (architectural historian or historic architect) to develop a Salvage Plan. The Salvage Plan shall be approved by the City prior to demolition activities.

Although these measures would lessen the impact of Alternative 7 on historical resources, the impact would not be fully mitigated and would be significant and unavoidable.

### **Air Quality and GHG Emissions**

Air Quality and GHG emissions during construction would increase under Alternative 7 as it would involve a greater amount of demolition (i.e., the existing Forum structure) than the Project. Therefore, impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6) and GHG

emissions (Impact 3.7-1 and 3.7-2) during construction would increase. As a result, air quality impacts during construction with respect to emissions of criteria pollutants would be greater than the Project's significant and unavoidable criteria pollutant emissions impacts.

### **Basis for Finding**

As set forth in the ESA Alternatives Memo, Alternative 7 is considered infeasible for the following reasons:

- To efficiently distribute parking for the operation of the Arena on the Alternative 7 site, the main parking structure under this Alternative would be located on the north side of the site, along West Manchester Boulevard, and additional surface parking would be accessed from the east, off of Kareem Court and Pincay Drive. As a result of these access requirements, the primary plaza and open space for Alternative 7 would be aligned along the western edge of the site, between the arena structure and South Prairie Avenue. From a design perspective, the shape and orientation of the plaza would inhibit the creation of an appealing urban environment.
- It is not structurally feasible to renovate the existing Forum building to meet the requirements of a modern NBA arena. For this reason, the existing Forum building would need to be demolished, resulting in the significant and unavoidable impact associated with the loss of a historic resource. Even if it was structurally feasible to renovate the arena, these changes would remove or substantially alter the character defining features of The Forum that make it eligible for listing on the National Register and California Register.
- City Objective 5 is to “[t]ransform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City.” Alternative 7 would not be as responsive to this objective as the Proposed Project. Finally, because the Forum Alternative would result in a new significant and unavoidable impact as a result of the demolition of the historic Forum building, it would be less responsive than the Proposed Project to City Objective 10, which calls for the project objectives to be achieved “in an expeditious and environmentally conscious manner.”
- City policy, as embodied in the General Plan Land Use Element, calls for the promotion of economic development that would generate opportunities and employment for the City's residents. Contrary to these goals, the Forum Alternative would involve the development of the same or substantially similar components of the Proposed Project on approximately 28 acres currently occupied by the historic Forum concert and event venue and ancillary structures and surface parking, it would generate the same approximate revenues to the City and the Inglewood Unified School District as the Proposed Project. However, it would result in the demolition of The Forum entertainment venue, and would eliminate the current revenue that is generated to the City, which is materially larger than the revenue generation from the uses on the proposed Project

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Site. As such, The Forum Alternative would generate a materially smaller level of net new economic development than the Proposed Project.

- Under Alternative 7, the proposed Project Site would not be developed as under the Proposed Project. Similar to the No Project Alternative, the Project Site would remain vacant and under-developed. Agreements between the FAA and the City under the AIP program provide that the City and the Successor Agency must use their best efforts to dispose of parcels acquired under this program at a fair market value at the earliest practicable time. Holding the Project Site vacant under Alternative 7 would be inconsistent with the obligation to use such best efforts, as specified in grant agreements under the FAA AIP program. Alternative 7 would also be inconsistent with the City's objective to "transform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City."
- The need to restart the planning and entitlement process would result in schedule extensions that would obstruct the ability to meet the project applicant's schedule objective to open in time for the 2024-2025 NBA season.
- The Alternative 7 site also does not meet the definition of "project area" included in PRC section 21168.6.8(a)(5). Thus, The Forum Alternative would not meet the requirements for compliance with AB 987. As a result of this change, should the adequacy of the EIR be litigated, rather than the AB 987 dictated 270-day process for legal proceedings, including any potential appeals, the project would be subject to the established legal process which can take three or more years. As a result of a more extended legal process, litigation regarding the adequacy of the EIR for Alternative 2 would likely obstruct the ability to meet the project applicant's schedule objective to open in time for the 2024-25 NBA season. That is because construction financing is often unavailable while CEQA litigation is pending, meaning that construction would not be able to proceed until after litigation is resolved even if no injunction is issued. Indeed, the extent to which CEQA litigation interferes with the ability to move forward with projects while such litigation is pending is a central aim of statutes, such as AB 987, establishing an accelerated time frame for the resolution of CEQA litigation. (See, e.g., Legislative Findings adopted pursuant to Assembly Bill 734 (2018 Stats. Chapter 959, § 1), Senate Bill 743 (2013 Stats. Chapter 386, § 1.) The same considerations apply here.
- Under AB 987, the project applicant has committed to a Greenhouse Gas (GHG) reduction plan that includes a number of local measures that would provide benefits in the City of Inglewood.. Because AB 987 would not apply at this site, these measures would not be implemented under Alternative 7.
- Parcels on the Project Site have remained largely vacant despite the City's longstanding efforts to encourage redevelopment. If the Proposed Project were not to be constructed on the Project Site,

these parcels would likely be vacant for the foreseeable future, and thus the site would not be transformed to include land uses that are compatible with the existing noise environment.

The City Council rejects Alternative 7 (The Forum Alternative Site) on each of these grounds independently. All of the reasons provide sufficient independent grounds for rejecting this alternative.

### **Finding**

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible Alternative 7.

### **B. Alternatives Proposed by Commenters**

In comments on the Draft EIR, alternatives to the Project were suggested. The City evaluated those alternatives in response to comments to the extent appropriate, and declines to provide further analysis as unnecessary based on the entirety of the record and as explained in responses to comments in the Final EIR. Specifically, with respect to the project alternatives suggested by commenters that were not added to the Final EIR and were not selected instead of the Project, the City hereby adopts and incorporates by reference the reasons set forth in the responses to comments contained in the Final EIR as its grounds for rejecting those alternatives. The City Council further incorporates the table set forth above in Section V of these findings, which addresses the disposition of mitigation measures and alternatives proposed by commenters.

### **C. Alternatives Considered and Dismissed from Further Consideration**

In identifying alternatives to the Project, primary consideration was given to alternatives that could reduce significant unavoidable impacts resulting from the Project. Certain impacts that are identified as being significant and unavoidable under the Project (e.g., increase in air pollutants from project construction and operation) are due primarily to intensifying development activity in an area that is currently underutilized. These impacts would not be possible to eliminate, but could be reduced by limiting the size of the project. Alternatives that reduce the intensity of development on the project site or change the location of the project are addressed later in this chapter.

The following alternatives were considered but dismissed from further analysis because they would not fulfill most of the project objectives, would not eliminate or substantially lessen environmental effects, and/or would otherwise be infeasible:

#### **• Entertainment Venue:**

Under this alternative the Project Site would be developed with retail, restaurants, an entertainment center, and a major hotel. The purpose of the alternative would be to create a unique destination that would complement planned uses located within the Hollywood Park

Specific Plan (HPSP) and the existing venue at The Forum. The alternative would be patterned and sized similar to other entertainment venues within the Southern California region including Downtown Disney in Anaheim (20 acres), Universal Citywalk in Universal City (23 acres), The Grove in Los Angeles (17.5 acres), and Great Wolf Lodge in Garden Grove (13 acres).

This alternative was dismissed from further consideration because the Project Site is fragmented, does not provide a single parcel of sufficient size on which to develop a thoughtfully arranged entertainment district. This alternative was also dismissed because it could draw business away from similar land uses approved for development within the neighboring HPSP, and thus could negatively affect the City's economic development goals for the HPSP area. Finally, this alternative would fail to meet most of the basic objectives of the Project, including the City's objective to establish a world class basketball and event center and to bring an NBA franchise back to Inglewood (City Objective 1), and the Applicant's goals to build the long-term home of the LA Clippers NBA basketball team (project applicant Objectives 1a–1f).

- **Substantially Reduced Arena:**

Under this alternative the size of the arena on the Project Site would be materially reduced sufficiently to substantially lessen the significant transportation and related air quality impacts of the Project. In order to achieve such a lessening, in this alternative the capacity of the arena would have to be reduced by 50 percent or more, leading to a maximum capacity of no more than 9,000 attendees. This alternative would result in fewer people visiting the site and thus fewer trips being generated on the local and regional transportation system. In turn, this alternative would reduce impacts associated with traffic and traffic-related air pollutant emissions and noise.

This alternative was dismissed from further consideration because the material reduction in the size of the arena (e.g., 50 percent reduction in seats) that would be needed to substantially lessen traffic-related impacts would not meet the NBA's sizing requirements for the arena. The smallest recently-constructed NBA arenas include those built in Sacramento (Golden 1 Center, opened in 2016) and Milwaukee (Fiserv Forum, opened in 2018) which were built with an NBA game capacity of approximately 17,500. The smallest arena that is home to an NBA team is the Smoothie King Center in New Orleans, built in 1999 with a capacity of 16,867. An arena that would meet NBA standards and is of a size comparable to the recently-opened arenas in Sacramento and Milwaukee is discussed below under Alternative 2.

Because this alternative would be below the capacity required by the NBA, it would fail to meet most of the basic objectives of the Project, including the City's objective to establish a world class basketball and event center and to bring an NBA franchise back to Inglewood (City Objective 1), and the Applicant's goals to build the long-term home of the LA Clippers NBA basketball team (project applicant Objectives 1a–1f).

- **Housing:**

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A comment on the Notice of Preparation (NOP) suggested consideration of an alternative consisting of the development of housing on the Project Site, consistent with the R-3 zone that existed on the project site prior to 1980 (see Appendix B). Under this alternative the Project Site would be developed with a variety of housing types, including single-family, condominium/townhome, and multi-family uses.

This alternative was eliminated from further consideration because of inconsistency with the existing and anticipated noise environment associated with Los Angeles International Airport (LAX). The Project Site is located approximately 2 miles east of LAX, along the extended centerlines of Runways 25R and 25L. As such, the Project Site is located within the planning boundary/airport influence area (AIA) established for LAX in the Los Angeles County Airport Land Use Plan (ALUP). According to the Los Angeles County Airport ALUP, the Project Site is located in areas exposed to noise levels ranging from CNEL 65–70dB, and from CNEL 70–75 dB. Consistent with ALUP Policies G-1 and N-3, the compatibility of proposed land uses is determined by consulting the land use compatibility table provided in Section V of the ALUP, and according to the table, residential land uses located in areas exposed to noise levels of CNEL 65–70 dB must be reviewed for noise insulation needs while residential land uses in areas exposed to noise levels of CNEL 70–75 dB are to be avoided unless they are related to airport services.

Moreover, between the 1980s and the early 2000s, the City engaged in a property purchase program, supported by FAA noise mitigation funds, to remove residential uses within these noise contours. This alternative would consist of reversing this program, and constructing new housing on the site. The FAA has stated that residential development of these noise-impacted properties is “inherently inconsistent with the intent of the City’s land acquisition/noise mitigation program, approved and funded by the FAA,” and that residential use of the properties “may be inconsistent with Grant Assurance #21, Compatible Land Use, and Grant Assurance 31, Disposal of Land.”<sup>53</sup> For these reasons, and in light of the noise environment at the Project Site, this alternative was dismissed from further consideration.

In addition, this alternative was eliminated from further consideration because it would fail to meet most of the basic objectives of the Project, including the City’s objective to promote the City as a premier regional sports and entertainment center and to establish a world class basketball and event center and to bring an NBA franchise back to Inglewood (City Objective 1); to establish a world class basketball and event center that increases sports and entertainment and construction-related employment opportunities; to expand opportunities for City residents and visitors to participate in sporting, cultural and civic events (City Objective 3); and to transform the Project Site to uses compatible with the aircraft noise contours generated by operations at LAX and in compliance with the FAA grants to the City (City Objective 5).

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<sup>53</sup> David F. Cushing, Manager, Los Angeles Airports District Office, U.S. Department of Transportation, Federal Aviation Administration, August 26, 2019.

Further, development of a housing alternative would not meet the Applicant's objectives to build the long-term home of the LA Clippers NBA basketball team (project applicant Objectives 1a–1e); to contribute to the economic and social well-being of the surrounding community by providing public benefits such as opportunities for youth- and community-oriented programs, and increasing revenues generated by property and sales taxes, admissions taxes, and potential transient occupancy taxes (project applicant Objective 1f); to create a unique visitor experience that is competitive with other new major event venues, including state-of-the-art media, sound, and lighting systems; patron amenities; and other features (project applicant Objective 2b); and to develop a basketball and entertainment center with features that enhance the Project's sense of place as a major urban sports and entertainment venue, including gathering spaces, signage, and other amenities (project applicant Objective 3b).

- **Employment Center/Business Park:**

As requested by several comments on the NOP and consistent with the Inglewood International Business Park (IIBP) Specific Plan, the City considered an alternative under which the Project Site would be developed with employment generating uses such as a business park or light industrial uses. This alternative was dismissed from further consideration because since the approval of the IIBP Specific Plan in 1993 the City has sought to attract businesses to the Project Site, but has not been able to generate momentum or build interest in the site from private sector business park developers. The inability to construct a business park on the site, despite decades-long City efforts to encourage such uses, indicates that a business park is economically infeasible at this location. In addition, a very substantial amount of commercial office space is planned in the neighboring HPSP, including 466,000 square feet (sf) in the Adjusted Baseline projects and another 3,567,314 square feet under cumulative conditions (see Section 3.0, subsections 3.0.6 and 3.0.7). Development of this amount of commercial office space would meet demand for office and employment generating uses in the area, and accomplish the City's goals for job generation.

Also, this alternative was eliminated from further consideration because it would fail to meet most of the basic objectives of the Project, including the City's objective to promote the City as a premier regional sports and entertainment center and to establish a world class basketball and event center and to bring an NBA franchise back to Inglewood (City Objective 1); to expand opportunities for City residents and visitors to participate in sporting, cultural and civic events (City Objective 3); and to create employment and construction-related employment opportunities in the City of Inglewood (City Objective 7).

Further, development of a housing alternative would not meet the Applicant's objectives to build the long-term home of the LA Clippers NBA basketball team (project applicant Objectives 1a–1e); to contribute to the economic and social well-being of the surrounding community by providing public benefits such as opportunities for youth- and community-oriented programs, and increasing revenues generated by property and sales taxes, admissions taxes, and potential transient occupancy taxes (project applicant Objective 1f); to create a unique visitor experience that is competitive with other new major event venues, including state-of-the-art media, sound,



and lighting systems; patron amenities; and other features (project applicant Objective 2b); and to develop a basketball and entertainment center with features that enhance the Project's sense of place as a major urban sports and entertainment venue, including gathering spaces, signage, and other amenities (project applicant Objective 3b).

- **Alternative Locations in the City of Inglewood:**

- Imperial/Crenshaw Commercial Center**

The City considered the Imperial/Crenshaw Commercial Center as a potentially feasible alternative location. This site is approximately 10.5 acres and is located at the southeast corner of the intersection of Imperial Highway and Crenshaw Boulevard, approximately 1.5 miles southeast of the Project Site. The Center is made up of an approximately 210,000 sf set of one-story commercial buildings containing retail and service businesses, a six-story, approximately 96,000 sf office building, an approximately 5,000 sf retail outparcel containing a fast-food restaurant, and approximately 7.7 acres of surface parking lot.

Although not as large as the Project Site, this site was deemed of sufficient size to accommodate the arena structure and a limited amount of parking and complementary uses. It had certain advantages including proximity to the LA Metro Green Line Crenshaw Station, only 0.5 miles south on Crenshaw, near I-105, and similar close access to the I-105 freeway. The site is located only approximately 0.4 miles from the end of the runway at Hawthorne Airport, but is outside of any limiting airport safety zones or noise contours.

This alternative would fail to meet several of the City's basic objectives of the Project. Although the site is located within the City, this site would not meet certain of the City's objectives. This alternative would not transform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City, and would not strengthen the community by providing public and youth-oriented space, outdoor community gathering space, and outdoor plazas. Because of its small size, this site would fail to meet the applicant's goal of consolidating LA Clipper team operations and facilities in a single location (1c), and due to its distance from the NFL Stadium and The Forum, it would not respond to applicant objective 1(e) which calls for the creation of a lively, visitor- and community-serving environment year-round for patrons, employees, community members, and visitors to the surrounding neighborhood and nearby sports and entertainment venues.

The majority of the buildings are occupied by current tenants and the property owners have recently invested in an upgrade and expansion of the Center. The site is not underutilized or vacant, and is well maintained. The site is not currently for sale or reasonably considered available for development. For all of these reasons, the City eliminated this site from further consideration.

- **Alternative Locations Considered by the Project Applicant:**

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With its lease at Staples Center expiring at the end of the 2023–2024 NBA season, the LA Clippers organization began exploring options for a new arena in the Los Angeles area in late 2014/early 2015. The LA Clippers engaged a team of experienced professionals to identify sites in the greater Los Angeles area that could accommodate a new, state-of-the-art NBA arena, relocated LA Clippers team facilities, and supporting, ancillary commercial, retail, and community uses.

The process of identifying potential sites involved consideration of key preliminary site criteria such as adequate site size and configuration (with specifics varying depending on site conditions and parking arrangements), proximity to existing and anticipated future fan base, access to existing and planned transportation and parking facilities, environmental conditions, site acquisition and development cost (including tenant relocation considerations), and an ability to assemble and control the site within the timeframe needed to open a new arena by the 2024- 2025 NBA season.

The following is a summary of some of the main sites that were identified and considered in preliminary site analyses.

Numerous sites in and around downtown Los Angeles were identified and considered. They were ultimately not selected due to site assembly and/or relocation issues: (a) the Piggyback site and UPS Site along the Los Angeles River near the intersection of Highway 101 and the I-5 Freeway; (b) Civic Center East near Little Tokyo and Union Station; (c) the BOS Yard in Boyle Heights at East 7th Street and South Mission Road, just east of the Los Angeles River and west of the I-10 Freeway; and (d) 8th and Alameda, just west of the Los Angeles River and north of the I-10 Freeway.

Sites on the west side of Los Angeles, in closer proximity to the existing and anticipated future fan bases, were preliminarily identified, but while under consideration by the LA Clippers these sites or portions thereof were sold to other developers and/or development commenced on those sites or portions thereof: (a) Fairfax DWP at South Fairfax Avenue and the I-10 Freeway; (b) Howard Hughes Center; and (c) Centinela Avenue and Jefferson Boulevard.

The preliminary site analysis also considered sites south of Inglewood, and as far south as Long Beach. Of those, the District at South Bay site, located in Carson west of the San Diego Freeway (I-405) and south of Del Amo Boulevard, was outside of but closest to the preferred west side fan base location. This site is analyzed as Alternative 5, in Section 6.5 below.

On the west side of Los Angeles, in addition to Inglewood, the team considered the Marlton Square area in Baldwin Hills. The team first considered a development site to the south and west of the intersection of Marlton Avenue and Martin Luther King Jr. Boulevard. While that site was being analyzed, the immediately adjacent Kaiser Permanente Baldwin Hills-Crenshaw Medical Center along Santa Rosalia Drive was under construction, and it was determined that it would be infeasible to develop the arena and provide necessary access to the arena and the Kaiser facility on the remainder of the site from either Marlton Avenue or Martin Luther King Jr. Boulevard.

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The team conducted a preliminary analysis of the Baldwin Hills Crenshaw Plaza Mall site east of Marlon Avenue and identified site assembly and entitlement challenges. The Baldwin Hills Crenshaw Plaza mall site is analyzed as Alternative 4, in Section 6.5 below.

In Inglewood, the LA Clippers also had some contact with the ownership of both the Hollywood Park Specific Plan (HPSP) site and The Forum site. These two sites are described and analyzed as Alternatives 6 and 7, respectively, in Section 6.5 below.

The LA Clippers determined that the site at West Century Boulevard and South Prairie Avenue in the City of Inglewood would best meet the site criteria, given the proximity to existing and anticipated future fan bases, the potential for timely site assemblage and control with a substantial amount of vacant municipal-owned land, and the unique opportunity to be part of a world-class sports and entertainment district.

#### **D. Summary of Discussion Regarding Alternatives**

For all of the foregoing reasons, and each of them, the City has determined to approve the Project rather than an alternative to the Project.

#### **Section VII. Statement of Overriding Considerations**

Pursuant to Public Resources Code section 21081, subdivisions (a)(1)-(a)(2), and CEQA Guidelines section 15092, the City Council finds that in approving the Project it has eliminated or substantially lessened all significant and potentially significant effects of the Project on the environment where feasible, as shown in Sections 3.1 through 3.15 of the EIR. The City Council further finds that it has balanced the economic, legal, social, technological, and other benefits of the Project against the remaining unavoidable environmental risks in determining whether to approve the Project and has determined that those benefits outweigh the unavoidable environmental risks and that those risks are acceptable. The City Council makes this statement of overriding considerations in accordance with Public Resources Code section 21081, subdivision (a)(3), and CEQA Guidelines section 15093 in support of approval of the Project.

The City adopts each of the following factors in approving this statement both collectively and individually. Any one of these factors is sufficient to support the City's approval of the Project. If any of these factors is determined to be insufficient, or lacking in substantial evidence, the City nevertheless adopts all other factors cited in this statement. Any one of the reasons for approval cited below is sufficient to support the City's approval of the Project. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this Section, and in the documents found in the Record of Proceedings, as defined in Public Resources Code section 21167.6, subdivision (e).

The City Council has considered the information contained in and related to the EIR (the Draft EIR, Comments and Responses to those documents, text changes and other revisions included in the Final EIR, and all other public comments, responses to comments, accompanying technical memoranda and staff reports, and findings included in the public record for the Project). Pursuant to CEQA Guidelines section 15092, the City Council finds that in approving the Project it has eliminated or substantially lessened all significant and potentially significant effects of the Project on the environment where feasible as shown in the findings. As set forth in the findings, the Project will nevertheless result in the following significant and unavoidable impacts:

**Comment [U11]:** Suggest conforming this paragraph to the definition of record in Section 1.F.

Impact 3.2-1: Construction and operation of the Proposed Project would conflict with implementation of the applicable air quality plan.

Impact 3.2-2: Construction and operation of the Proposed Project would result in a cumulatively considerable net increase in NO<sub>x</sub> emissions during construction, and a cumulatively considerable net increase in VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions during operation of the Proposed Project.

Impact 3.2-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development, would result in inconsistencies with implementation of applicable air quality plans.

Impact 3.2-6: Construction and operation Proposed Project, in conjunction with other cumulative development, would result in cumulative increases in short-term (construction) and long-term (operational) emissions.

Impact 3.11-1: Construction of the Proposed Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact 3.11-2: Operation of the Proposed Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact 3.11-3: Construction of the Proposed Project would generate excessive groundborne vibration levels.

Impact 3.11-5: Construction of the Proposed Project, in conjunction with other cumulative development, would result in cumulative temporary increases in ambient noise levels.

Impact 3.11-6: Operation of the Proposed Project, in conjunction with other cumulative development, would result in cumulative permanent increases in ambient noise levels.

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Impact 3.11-7: Construction of the Proposed Project, in conjunction with other cumulative development, would generate excessive groundborne vibration.

Impact 3.14-1: Operation of the Proposed Project ancillary land uses would cause significant impacts at intersections under Adjusted Baseline conditions.

Impact 3.14-2: Daytime events at the Proposed Project Arena would cause significant impacts at intersections under Adjusted Baseline conditions.

Impact 3.14-3: Major events at the Proposed Project Arena would cause significant impacts at intersections under Adjusted Baseline conditions.

Impact 3.14-4: Operation of the Proposed Project ancillary land uses would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.

Impact 3.14-5: Daytime events at the Proposed Project Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.

Impact 3.14-6: Major events at the Proposed Project Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.

Impact 3.14-8: Daytime events at the Proposed Project Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions.

Impact 3.14-9: Major events at the Proposed Project Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions.

Impact 3.14-10: Certain components of the Proposed Project would generate VMT in excess of applicable thresholds.

Impact 3.14-11: Operation of the Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under Adjusted Baseline conditions.

Impact 3.14-15: The Proposed Project would substantially affect circulation for a substantial duration of construction under Adjusted Baseline conditions.

Impact 3.14-16: Operation of the Proposed Project ancillary land uses would cause significant impacts at intersections under cumulative conditions.

Impact 3.14-17: Daytime events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions.

Impact 3.14-18: Major events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions.

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Impact 3.14-19: Operation of the Proposed Project ancillary land uses would cause significant impacts on neighborhood streets under cumulative conditions

Impact 3.14-20: Daytime events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions.

Impact 3.14-21: Major events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions.

Impact 3.14-23: Daytime events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions.

Impact 3.14-24: Major events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions.

Impact 3.14-25: The Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions.

Impact 3.14-27: The Proposed Project would substantially affect circulation for a substantial duration of construction under cumulative conditions.

Impact 3.14-28: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts at intersections under Adjusted Baseline conditions.

Impact 3.14-29: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts on freeway facilities under Adjusted Baseline conditions.

Impact 3.14-30: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would adversely affect public transit operations or fail to adequately provide access to transit under Adjusted Baseline conditions.

Impact 3.14-31: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would result in inadequate emergency access under Adjusted Baseline conditions.

Impact 3.14-32: The Proposed Project would substantially affect circulation for a substantial duration during construction during major events at The Forum and/or the NFL Stadium under Adjusted Baseline conditions.

Impact 3.14-33: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts at intersections under cumulative conditions.

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Impact 3.14-34: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts on freeway facilities under cumulative conditions.

Impact 3.14-35: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions.

Impact 3.14-36: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would result in inadequate emergency access under cumulative conditions.

Impact 3.14-37: The Proposed Project would substantially affect circulation for a substantial duration during construction during major events at The Forum and/or the NFL Stadium under cumulative conditions.

The list of significant and unavoidable impacts set forth above is intended to be a comprehensive list of such impacts. In the event one or more significant and unavoidable impacts is not included in this list, the omission is inadvertent. The City Council adopts this statement of overriding considerations notwithstanding this omission.

The City Council finds that it has balanced the economic, legal, social, technological and other benefits of the Project against these remaining significant and unavoidable environmental impacts in determining whether to approve the Project. The City Council has determined, and finds those benefits outweigh the impacts and that those impacts are acceptable. The City Council makes this statement of overriding considerations in accordance with Public Resources Code section 21081, subdivision (a)(3), and CEQA Guidelines section 15093 in support of approval of the Project. Specifically, in the City Council's judgment, the benefits of the Project as approved outweigh the significant, unavoidable, unmitigated adverse impacts and the proposed Project should be approved.

The Project has the following benefits:

- 1. The Project allows the City to advance its economic development goals, and to realize its decades-long goal of revitalizing parcels on the Project Site with productive uses for the enjoyment of the public and which are compatible with applicable noise regulations and agreements.**

The City of Inglewood identifies goals of the City to promote economic development in the City's General Plan Land Use Element. In particular, the General Plan identifies a goal to "[h]elp promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions."<sup>54</sup> The General Plan further establishes a goal to "[p]romote the

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<sup>54</sup> City of Inglewood, *General Plan Land Use Element*, January 1980, page 6.  
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development of commercial/recreational uses which will complement those which already are located in Inglewood.”<sup>55</sup> Consistent with those goals, the Proposed Project would redevelop the site into a new state-of-the-art sports and entertainment facility with related uses that promotes economic development and generates employment opportunities during the construction period and during the subsequent operational life of the Project.

These parcels have remained vacant and underutilized despite the City’s efforts to encourage investment and redevelopment. In particular, the Project Site is comprised of approximately 28 acres of land. Most of the Project Site – approximately 84 percent – consists of parcels owned by the City of Inglewood or the City of Inglewood as Successor Agency to the Inglewood Redevelopment Agency (“City Parcels”). The Project Site consists of mostly vacant or undeveloped land, and six developed parcels. Proximity to nearby airports, especially LAX, has played a substantial role regarding the lack of development on the Project Site. The Project Site falls within the Airport Influence Area for LAX for the southern runway. A portion of the Project Site is located within the Planning Boundary/ALA for LAX as designated in the Los Angeles County ALUP, which places limitations and conditions on the nature and type of development that can occur. The majority of the Project Site is within the 65 CNEL noise contour for the LAX flight path. These factors constrain development that can occur on the Project Site.

Beginning in the mid-1980s, the FAA began to issue grants to the City of Inglewood with the objective of recycling incompatible land uses to land uses that are compatible with the noise level of airport operations. Under that program, the FAA and the City of Inglewood approved the acquisition of the vast majority of City Parcels on the Project Site, subject to certain requirements, including restrictions on land uses to ensure compatibility with specified airport noise levels of operation. Other City Parcels were acquired with redevelopment funds (along with the FAA grants) for the same purpose of noise abatement. The FAA has stated that residential development of these noise-impacted properties is inconsistent with the intent of the City’s land acquisition noise mitigation program. (David F. Cushing, Manager, Los Angeles Airports District Office, U.S. Department of Transportation, Federal Aviation Administration, August 26, 2019.)

Against this backdrop, the City has long pursued a sustained and comprehensive plan of economic redevelopment of the City Parcels. In furtherance of its redevelopment efforts, the City undertook various efforts to adopt land use policies and regulations that would encourage redevelopment of the City Parcels in a manner that is consistent with the LAX- and noise-related constraints outlined above. These policies and regulations include adopting revised General Plan and Zoning designations for the City Parcels. In particular, in 1993 the City approved the Inglewood International Business Park Specific Plan encompassing much of the site. This plan envisioned the development of an attractive, campus-like business park, and established guidelines designed to encourage this use. During the intervening 27 years, however, the development anticipated and encouraged under the plan has not occurred due to a lack of investment interest in such a project. Available evidence indicates, therefore, that if the business park plan remains the operative land-use plan for the Project Site, it will remain vacant and/or underutilized.

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<sup>55</sup> City of Inglewood, *General Plan Land Use Element*, January 1980, page 7.  
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The City has continuously invested in the beautification of and redevelopment along Century Boulevard and desires to continue those efforts.

The Project will provide for redevelopment of the Project Site in a manner that is consistent with the terms of FAA grants and with land-use limitations associated with proximity to LAX. The Project will therefore enable the City to realize its decades-long goal of redevelopment the area for productive, compatible uses. For further information on the importance of this benefit, see ESA Alternatives Memo, pp. 3-4.

The Project will accomplish this goal in a manner that builds upon, and advances, the City's investment in beautification of the Century Boulevard corridor. The benefits of this further investment will extend beyond the Project site, and will encourage other private investment along the Century Boulevard corridor.

The Project will accomplish these longstanding City goals in a manner that opens up the Project Site for public accessibility and use. The Project will provide public access to entertainment to its residents in the form of spectator sports, including basketball. The Project presents and promotes unique recreational uses for the enjoyment of the public in the form of economic development opportunity that finally allows the City to transform vacant and underdeveloped parcels on the Project site into productive, compatible land uses, following decades of prior efforts.

**2. The Project is part of a regional sports and entertainment center that will support Inglewood's "City of Champions" identity by bringing back a National Basketball Association franchise to the City.**

The Project provides the City with the unique redevelopment opportunity associated with a National Basketball Association (NBA) franchise, the Los Angeles Clippers. The opportunity to host an NBA franchise is rare, and the current opportunity was presented to the City in large part because of the expiring lease term of the Los Angeles Clippers at Staples Center and the desire of the team's ownership to build a new, state-of-the-art facility. The facility itself presents a significant economic development opportunity, and together with the adjacent SoFi Stadium and other recreational uses for the enjoyment of the public, expands the City's presence as a major sports and entertainment center.

The Project builds on the City's rich tradition in sports and entertainment. The arena component (the "Arena") and supporting uses are key components of a new destination sports and entertainment center. From 1967-1999 the Los Angeles Lakers NBA team played in The Forum, located approximately one mile north of the Project Site, before relocating to Staples Arena. The Forum also housed other sports teams, including the Los Angeles Kings of the National Hockey League, before The Forum was renovated and repurposed as a concert venue. From 1938-2013, the Hollywood Park horse racetrack operated on most of the area north of the Project Site, an area that is now designated for mixed-use development pursuant to the Hollywood Park Specific Plan (HPSP). The HPSP includes the substantially completed SoFi Stadium, which will house the Los Angeles Rams and the Los Angeles Chargers teams of the National Football League. The Project will support Inglewood's identity as the "City of Champions"

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by bringing back an NBA franchise to the City and helping to create and expand a world class sports and entertainment center.

**3. The Project is a privately financed, highly desirable public-private development that will help activate and revitalize the Project Site and promote recreational uses for the enjoyment of the public.**

The Project is a major public-private undertaking, calculated to promote the recreation and enjoyment of the public, and involving a substantial investment. The Project is privately funded, with the Project applicant incurring costs of site assembly, development and construction. The Project provides for professional basketball games to take place at the Arena, and also a series of special events and community events designed to promote recreational uses for the enjoyment of the public. In total, it is estimated that Project will accommodate as many as 243 events each year, activating the Project site year-round. The Project also includes Arena-supporting and hotel uses that will enliven the Project Site on non-event days. The Project Site includes a major outdoor pedestrian plaza adjacent to the Arena with circulation and gathering, specialized paving, landscaping, seating areas, and public art, including public access as provided in the Development Agreement. The plaza area will be maintained by the Applicant, and will be publicly accessible as set forth in Development Agreement Exhibit F. In sum, the Project provides a lively local and regional visitor-serving destination, and provide amenities and economic contributions to visitors and the surrounding neighborhood year-round. The Project's public art contribution will be substantial, as set forth in section 7.3.3 of the Development Agreement.

**4. The Project will meet high-quality sustainability and urban design standards.**

The Project design team includes sports architects and urban landscape experts with worldwide experience in designing major athletic venues. The Project approvals include Design Guidelines that are specific to the Project and address a wide variety of topics such as building design, landscaping, signage and lighting. The Project will be designed and constructed to meet or achieve the US Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold certification requirements. The Project will also provide onsite renewable energy generation including solar roofs, and provide cool roofs and cool parking promoting features, such as cool surface treatment for new parking facilities. LEED certification is anticipated to be achieved by the end of the first full NBA season. Key elements of the LEED certification will be its location in an urban infill environment, infill location, the density of the site and connectivity to the adjacent community, and accessibility to public transportation. Additional features may include indoor and outdoor water reduction measures, on-site renewable energy generation, optimized energy performance, and responsible construction and demolition waste management strategies, heat island reduction measures and light pollution measures. As reflected in the MMRP and in the Development Agreement, other major Project commitments and requirements include:

- The Applicant will prepare and implement a GHG Reduction Plan. The plan will include implementation of all measures set forth under Section 2.A of Mitigation Measure 3.7-1(a),

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Project Design Features 3.2-1 and 3.2-2 as identified in the Final EIR, and Mitigation Measures 3.2-2(b) and 3.14-2(b) as set forth in the MMRP.

- The GHG Reduction Plan will also include the following on-site measures:
  - Solar Photovoltaic System. Installation of a 700-kilowatt (kW) solar photovoltaic system, generating approximately 1,085,000 kW-hours of energy annually.
  - IBEC Smart Parking System. Installation of systems in the on-site parking structures serving the Project to reduce vehicle circulation and idle time within the structures by more efficiently directing vehicles to available parking spaces.
  - IBEC On-Site Electric Vehicle Charging Stations. Installation of a minimum of 330 electric vehicle charging stations (EVCS) within the three on-site parking structures serving the Project for use by employees, visitors, event attendees, and the public.
  - IBEC Zero Waste Program. Implementation of a waste and diversion program for operations of the Project, with a goal of reducing landfill waste to zero.
  - Renewable Energy. Reduction of GHG emissions associated with energy demand of the Project Arena that exceeds on-site energy generation capacity by using renewable energy consisting of purchase of electricity for onsite consumption through the Southern California Edison (SCE) Green Rate, SCE's Community Renewables Program, similar opportunities for renewable electricity that could emerge in the future and/or, if available after approval by applicable regulatory agencies, on-site use of renewable natural gas. Such renewable energy shall be used during Project operations for a period sufficient to achieve no less than 7,617 MT CO<sub>2</sub>e.
- The GHG Reduction Plan will also include implementation, prior to issuance of grading permits, of the following off-site measures:
  - City Municipal Fleet Vehicles ZEV Replacement. Entry into an agreement with the City to cover 100% of the cost of replacement of 10 municipal fleet vehicles that produced GHG emissions with Zero-Emissions Vehicles (ZEVs) and related infrastructure (e.g., EVCS) for those vehicles.
  - ZEV Replacement of Transit Vehicles Operating Within the City. Entry into an agreement with the City to cover 100% of the cost of replacement of 2 transit vehicles that operate within the City that produce GHG emissions with ZEVs and related infrastructure (e.g., EVCS) for those vehicles.

- Local Electric Vehicle Charging Stations in the City. Entry into agreements to install 20 EVCS at locations in the City available for public use for charging electric vehicles.
- City Tree Planting Program. Develop or enter into partnerships with existing organizations to develop a program to plant 1,000 trees within the City.
- Local Residential EV Charging Units. Implement a program to cover 100% of the cost of purchasing and installing 1,000 electric vehicle charging units for residential use in local communities near the Project site. Residents in the City and surrounding communities who purchase a new or used battery electric vehicle shall be eligible to participate in the program. City residents shall be given priority for participation in the program. Eligibility requirements and administration of the program shall ensure that only households that do not already own an electric vehicle participate in the program.
- The Applicant will achieve any remaining GHG emissions reductions necessary, as estimated in the GHG Reduction Plan, through GHG reduction co-benefits of NO<sub>x</sub> and PM<sub>2.5</sub> emissions reductions measures required by Development Agreement Exhibit Condition of Approval H-2, co-benefits of Project Design Features 3.2-1 and 3.2-2 and Mitigation Measures 3.2-2(b) and 3.14-2(b), and the purchase of carbon offset credits issued by an accredited carbon registry, such as the American Carbon Registry, Climate Action Reserve, or Verra. All carbon offset credits shall be permanent, additional, quantifiable, and enforceable.
- The Applicant will comply with the monitoring and reporting requirements set forth in Development Agreement Exhibit H-1.
- The Applicant will comply with Development Agreement Exhibit H-2, setting forth the Applicant's obligations with respect to conditions of approval requiring air pollutant emission reductions.
- The Applicant will implement a robust Transportation Demand Management ("TDM) Program, as set forth in Development Agreement Exhibit H-3. Among other things, the Applicant will implement Mitigation Measures 3.7.1(a) and 3.14-2(b), as set forth in the MMRP. The TDM Program will include strategies, incentives, and tools to provide opportunities for non-event employees and patrons as well as event attendees and employees to reduce single-occupancy vehicle trips and to use other modes of transportation besides automobile to travel to basketball games and other events hosted at the Project. Among other things, the TDM Program will include a dedicated shuttle service connecting the Project to existing and future Metro light rail stations. The TDM Program must achieve specific performance targets set forth in Exhibit H-3.

**5. The Project includes a series of commitments regarding transportation infrastructure that will benefit the larger community.**

The Project includes commitments regarding transportation infrastructure that will benefit the surrounding area on both event and non-event days. These commitments include road upgrades, road restriping, converting medians to turn lanes, widening off-ramps, and providing funding for intelligent transportation system improvements including cameras, vehicle sensors and changeable electronic message signs to better monitor and reroute cars from the City's traffic command center. The Project also includes streetscape and pedestrian circulation system improvements that would increase walkability and improve the pedestrian and bicyclist experience and accessibility on adjacent public rights of way near the Project Site, including illumination to highlight circulation paths and landscape features, and to create a safe pedestrian experience. The Project includes a transportation hub to accommodate transportation network companies (e.g., Uber and Lyft), bus stops and public transit upgrades, shuttles connecting the site to Metro stations, and other improvements to encourage the use of public transit. These commitments are set forth in the MMRP, in the Transportation Demand Management Program, in the Event Transportation Management Plan, and in Development Agreement Exhibits H-1, H-2 and H-3.

**6. The Project will provide substantial tax revenue to the City through property, sales, admissions, parking, transient occupancy and other taxes.**

The Project will generate approximately \$12.9 million in one-time tax revenues related to construction of the Project. Approximately 67% is related to the City's nonresidential construction tax, followed by 25% related to sales tax on construction materials, 8% related to business tax on contractor earnings and 0.8% related to documentary transfer tax. Construction of the Project will also generate about \$10.3 million for the Project's Arts Fee and Schools fee, which are non-general fund revenues.

The project applicant retained HR&A as a consultant to estimate the Project's net fiscal impact on the City. HR&A's analysis considers both revenues generated by, and costs incurred as a result of, the Project. HR&A estimates that, upon Project stabilized operations in 2025, the Project will generate (calculated in 2019 dollars) approximately \$4.54 million in annual net tax revenues. The City retained Keyser Marston Associates ("KMA") as a consultant to peer review this report. KMA estimates that net revenue to the City would be approximately \$4.4 million. The difference is due to slightly different assumptions and methodologies employed by the consultants. Under either scenario, however, the Project will generate substantial revenue for the City, even accounting for City costs associated with providing public services to the Project. HR&A estimates that, on a cumulative basis, the Project will generate approximately \$70.0 million in cumulative net fiscal impact (or \$149.1 million in nominal dollars) plus approximately \$72.4 million cumulatively in nominal property tax revenues.

The Project will also generate approximately \$2.3 million in annual property tax revenue (2019 dollars) for the Inglewood Unified School District.

HR&A's fiscal analysis for the Project also included sensitivity analysis for a reduced ancillary retail program and third-party events scenario to provide a more conservative analysis. As compared to the base Project scenario, the construction period analysis is substantially the same, with only a slight decrease of approximately 2% for one-time tax and City fee revenues. For operations, the net annual fiscal impacts

are reduced but would continue to be substantial at approximately \$4 million, or \$132 million cumulatively in nominal dollars. Thus, even under the very conservative assumptions reflected in this analysis, the Project will have a substantial, ongoing, positive effect on city revenue.

The Project will generate significant revenue for the City. This revenue includes substantial revenue generated from the following sources:

- Public Art for New Construction
- Parking
- Admissions
- Transit Occupancy
- Gross Receipts
- Utility Users
- Nonresidential Construction
- Real Property Transfer

These revenue sources are listed in the Development Agreement, Exhibit D, subject to Development Agreement sections 7.2.1, 7.2.2, 7.2.3 and 7.2.6. For specific information on these benefits, please see HR&A, *Economic and Fiscal Impact Report: Inglewood Basketball and Entertainment Center*, May 2020. For the City's peer review, please see *Peer Review – Economic and Fiscal Impact Report: Inglewood Basketball and Entertainment Center*, Memorandum from James Rabe, CRE, Keyser Marston Associates, to Christopher E. Jackson, Director, Inglewood Economic & Community Development Department (June 10, 2020).

**7. The Project will generate major new construction and permanent employment opportunities, including for Inglewood residents.**

During Project construction, approximately 7,269 total headcount jobs will be created, of which approximately 7,020 will be full-time and part-time construction jobs located at the Project Site. These jobs will include direct on-site workers, plus jobs generated through multiplier effects. Approximately \$466.7 million in compensation will be paid to workers directly and indirectly associated with construction, and the construction period will generate approximately \$1.06 billion in total economic output. Pursuant to the Development Agreement (see section 8, below), a significant portion of these jobs will be available to Inglewood residents and businesses.

On an annual basis once operations stabilize, approximately 1,557 total headcount jobs will be created, of which approximately 1,476 will be full-time and part-time operations jobs located at the Project Site. Approximately \$139.3 million in annual compensation will be paid to workers directly and indirectly associated with Project operations, and approximately \$267.9 million in total economic output will be generated. Pursuant to the Development Agreement (see section 8, below), a significant portion of these jobs will be available to Inglewood residents and businesses.

The fiscal analysis for the Project also included sensitivity analysis for a reduced ancillary retail program and third-party events scenario to provide a more conservative analysis. As compared to the base Project scenario, the construction period analysis is substantially the same, with only a slight decrease of approximately 2% for one-time tax and City fee revenues. For operations, the net annual economic impacts are reduced but would continue to be substantial at approximately \$210 million in annual net economic output and 1,190 jobs at stabilized operations.

For specific information on these benefits, please see HR&A, *Economic and Fiscal Impact Report: Inglewood Basketball and Entertainment Center*, May 2020.

### **8. The Development Agreement includes a number of additional public benefits.**

Pursuant to the terms of the Development Agreement (DA) between the City and the Applicant, and as set forth more fully in Exhibit C to the DA, the development of the Project will provide the City, its residents, and the surrounding region with a number of wide-ranging public benefits. As set forth below, such public benefits include: (1) the creation of local jobs and workforce equity; (2) commitments to affordable housing and renter support; (3) the rehabilitation of Morningside Park Library and the creation of community center; (4) support for Inglewood youth and education; (5) support for Inglewood seniors; (6) improving Inglewood parks; and (7) opportunity for community engagement and collaboration.

- **Creation of Local Jobs and Workforce Equity**

- **Minority/Disadvantaged Business Participation Goals.** Pursuant to the terms of the DA, the Applicant will require that all construction contractors have a goal to achieve participation by minority/disadvantaged business enterprises of at least 30% of the total value of funds awarded for contracts and subcontracts related to construction activities during the Project, with a goal of at least 50% of that 30% goal being awarded to local qualified businesses located in Inglewood. (DA, Ex. C, ¶ 1.)
- **Local Employment Opportunities.** Events at the Arena will result in additional employment opportunities for Inglewood residents and businesses. Pursuant to the terms of the DA, the Applicant must take certain steps with the goal of hiring qualified Inglewood residents for no less than 35% of the employment positions needed in connection with event operations at the Arena, including employment positions with Applicant's contractors, subcontractors, and vendors providing services in connection with events held inside the Arena, such as food and beverage service, hospitality, and event security. (DA, Ex. C, ¶ 2)
- **Job Fairs.** Pursuant to the terms of the DA, the Applicant will contribute up to \$150,000 over the lifetime of the Project in order to fund at least four job fairs and related advertising and promotion for those job fairs. All job fairs will be open to the

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general public and include information about available employment opportunities, as well as opportunities to submit resumes and applications. (DA, Ex. C, ¶ 3.)

- **Workforce Outreach Coordination Program.** In consultation with the City, the Applicant will fund a Workforce Outreach Coordination Program (the “WOCP”) in the aggregate amount of \$600,000, over a period of four years. As part of this effort, the Applicant will hire a local qualified Workforce Outreach Coordinator for the construction period, and must designate a Workforce Outreach Coordinator on the Arena operations staff following completion of construction, whose job responsibilities shall include marshaling and coordinating workforce outreach, and training and placement programs for the following types of positions: (i) construction jobs, including pre-apprentice programs; (ii) employees working for Event Operations Providers; and (iii) employees working for Applicant-owned and other retail operations at or around the Arena. The Workforce Outreach Coordinator must also marshal and coordinate workforce outreach and training and placement programs by engaging in the following community outreach activities: (i) advertising available workforce programs; (ii) establishing a community resources list that includes the Inglewood Chamber of Commerce, service organizations, block clubs, community town hall meetings, and religious organizations; and (iii) notification and advertising of upcoming job opportunities and job fairs as described in Exhibit C of the DA. (DA, Ex. C, ¶ 4.)
- **Job Training for Inglewood Residents.** Pursuant to the terms of the DA, the Applicant will contribute \$250,000, over a period of five years, to fund programs, managed by the South Bay Workforce Investment Board or similar organization(s), that will provide job skills to Inglewood residents entering the job market. (DA, Ex. C, ¶ 5.)
- **Construction Opportunities for the Formerly Incarcerated.** Pursuant to the terms of the DA, the Applicant will contribute a total of \$150,000, over a period of three years, to fund job placement programs for formerly incarcerated individuals in the building and construction trades. (DA, Ex. C, ¶ 6.)
- **Project Labor Agreement for Project Construction.** As described in the DA, the Applicant’s general contractor for the Project has entered into a Project Labor Agreement (“PLA”) with the Los Angeles/Orange County Building and Construction Trades, on behalf of its affiliate local unions and district councils. The PLA is intended to ensure that a sufficient supply of skilled craft workers is available to work throughout the Project, and that such work will proceed in a safe and efficient manner with due consideration for the protection of labor standards, wages, and working conditions. (DA, Ex. C, ¶ 7.)



- **Leased Space to Inglewood Restaurant.** Pursuant to the terms of the DA, the Applicant must make good faith efforts to lease at least one restaurant space in the Project to a qualified Inglewood business for at least one year on market terms. (DA, Ex. C, ¶ 8.)

- **Commitments to Affordable Housing and Renter Support**

- **Funding for Affordable Housing.** Pursuant to the terms of the DA, the Applicant will contribute up to \$75 million to a fund or program, managed by a Community Development Financial Institution or a similar organization, to provide low-interest loans for the acquisition, preservation, and development of affordable and mixed-income housing in the City, and/or to acquire land for the future development of affordable and mixed-income housing. (DA, Ex. C, ¶ 9.)
- **First-Time Homeowners Assistance.** Pursuant to the terms of the DA, the Applicant will contribute a total of \$2.5 million towards one or more first-time homebuyer programs (which may include down-payment assistance, homebuyer education, and credit coaching) for Inglewood residents with household incomes at or below the median income for Los Angeles County. (DA, Ex. C, ¶ 10.)
- **Emergency Support to Inglewood Renters and Anti-Eviction Services.** Pursuant to the terms of the DA, the Applicant will contribute a total of \$3 million, over a period of five years commencing with the issuance of the Certificate of Occupancy for the Arena, for purposes of preventing homelessness and providing legal support for families facing evictions in Inglewood. The funds will be distributed to one or more non-profits, government agencies, or similar organizations. (DA, Ex. C, ¶ 11.)
- **Capacity Building for Housing-Focused Non-Profits.** Pursuant to the terms of the DA, the Applicant will contribute \$250,000 in grants to help local and regional community development corporations, community development financial institutions, land banks, and other non-profits focused on housing to expand their respective operations and services for development of affordable housing in the City (e.g. hire new staff, expand office space, etc.). (DA, Ex. C, ¶ 12.)

- **Rehabilitation of Morningside Park Library and Creation of a Community Center**

Pursuant to the terms of the DA, the Applicant will contribute a total of \$6 million to rehabilitate the City’s Morningside Park Library as a library and community center, where members of the community can gather for group activities, social support, public information, and other purposes. (DA, Ex. C, ¶ 13.)

- **Support for Inglewood Youth and Education**

- **After School Tutoring for Inglewood Students.** Pursuant to the terms of the DA, the Applicant will contribute a total of \$4 million for after school tutoring programs for Inglewood students. (DA, Ex. C, ¶ 14.)
- **Youth Innovation and Design Camps.** Pursuant to the terms of the DA, the Applicant will contribute a minimum of \$500,000 for purposes of developing and operating coding, science, technology, and engineering camps and programs for Inglewood students. (DA, Ex. C, ¶ 15.)
- **Keeping Inglewood Students in School.** Pursuant to the terms of the DA, the Applicant will contribute a minimum of \$2,750,000 for purposes of discouraging Inglewood high school students from dropping out of school. (DA, Ex. C, ¶ 16.)
- **Opening Pathways to College for Inglewood Students.** Pursuant to the terms of the DA, the Applicant will contribute up to \$1 million for purposes of expanding counseling services and support for students seeking a post-secondary education. (DA, Ex. C, ¶ 17.)
- **College Scholarships for Inglewood Students.** Pursuant to the terms of the DA, the Applicant will contribute a minimum of \$4.5 million for purposes of providing scholarships to eligible low-income students in the Inglewood United School District that are accepted to either a 2-year or 4-year colleges. (DA, Ex. C, ¶ 18.)

- **Support for Inglewood Seniors.**

Pursuant to the terms of the DA, the Applicant will contribute a total of at least \$500,000 to fund social and educational programs at the Inglewood Senior Center. (DA, Ex. C, ¶ 19.)

- **Improving Inglewood Parks**

Pursuant to the terms of the DA, the Applicant will contribute \$300,000 to renovate public basketball courts in Inglewood. (DA, Ex. C, ¶ 20.)

- **Community Engagement & Collaboration**

- **Use of Arena for Charitable Causes.** Pursuant to the terms of the DA, the Applicant will provide the City, local schools, youth athletic programs, or a local community-based charitable organization designated by the City use of the Arena for up to 10 days per calendar year, on days that the Arena or surrounding facilities are available. (DA, Ex. C, ¶ 21.)
- **Access to NBA Games for Community Groups.** Pursuant to the terms of the DA, the Applicant will dedicate an average of 100 general admission tickets to every Los Angeles Clippers basketball home game at the Arena during the regular season for use by a community group at no charge. (DA, Ex. C, ¶ 22.)

Having considered the benefits outlined above, the City Council finds that the benefits of approving the Project outweigh and override the significant, unavoidable adverse environmental effects associated with the Project, and therefore, the Project's significant, unavoidable adverse environmental effects are acceptable.