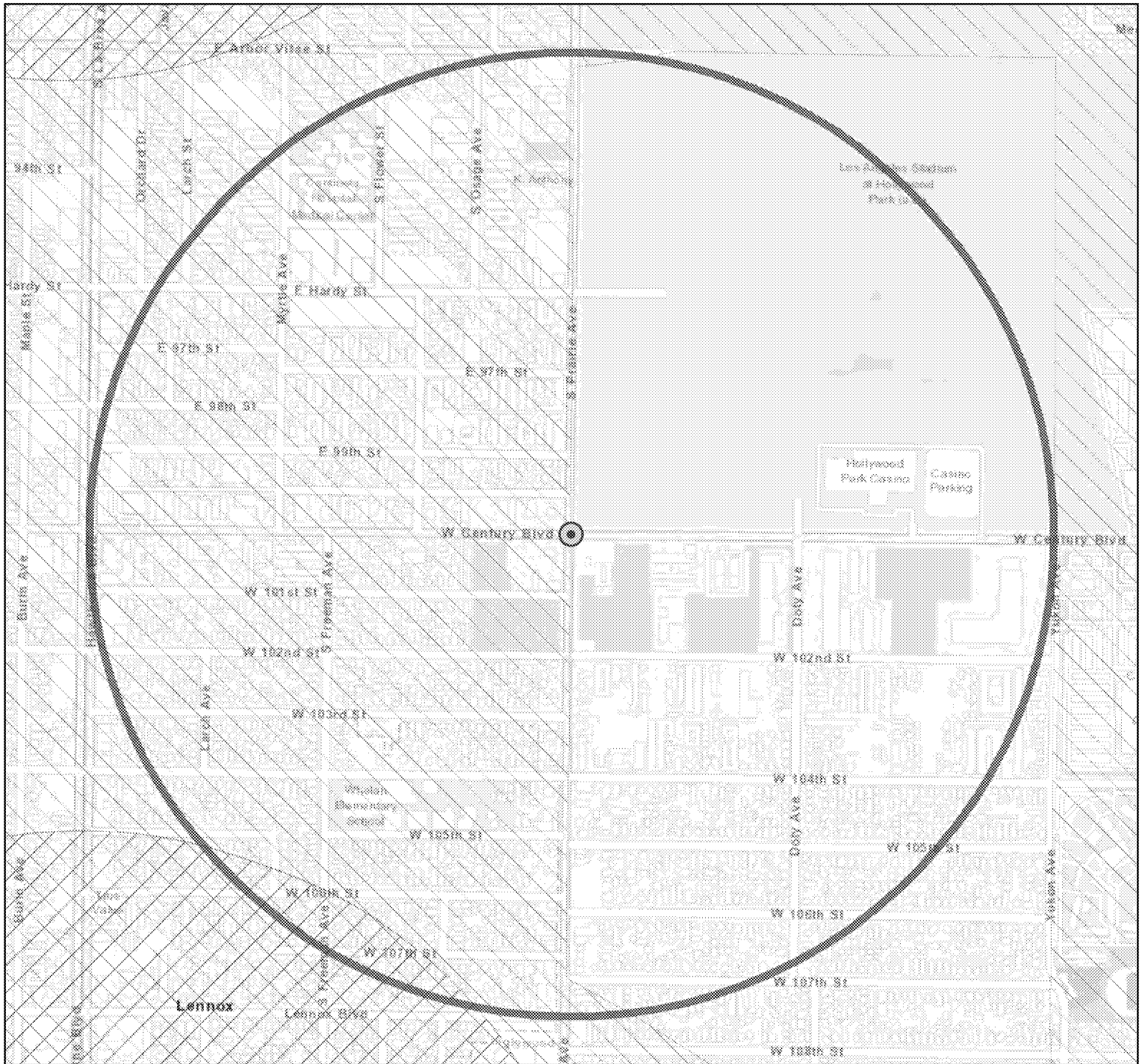






EXHIBIT 8

High Quality Transit Areas (HQTA) and Transit Priority Areas (TPA) One-Half Mile from Intersection of W. Century Blvd. and S. Prairie Ave. [Year 2012]

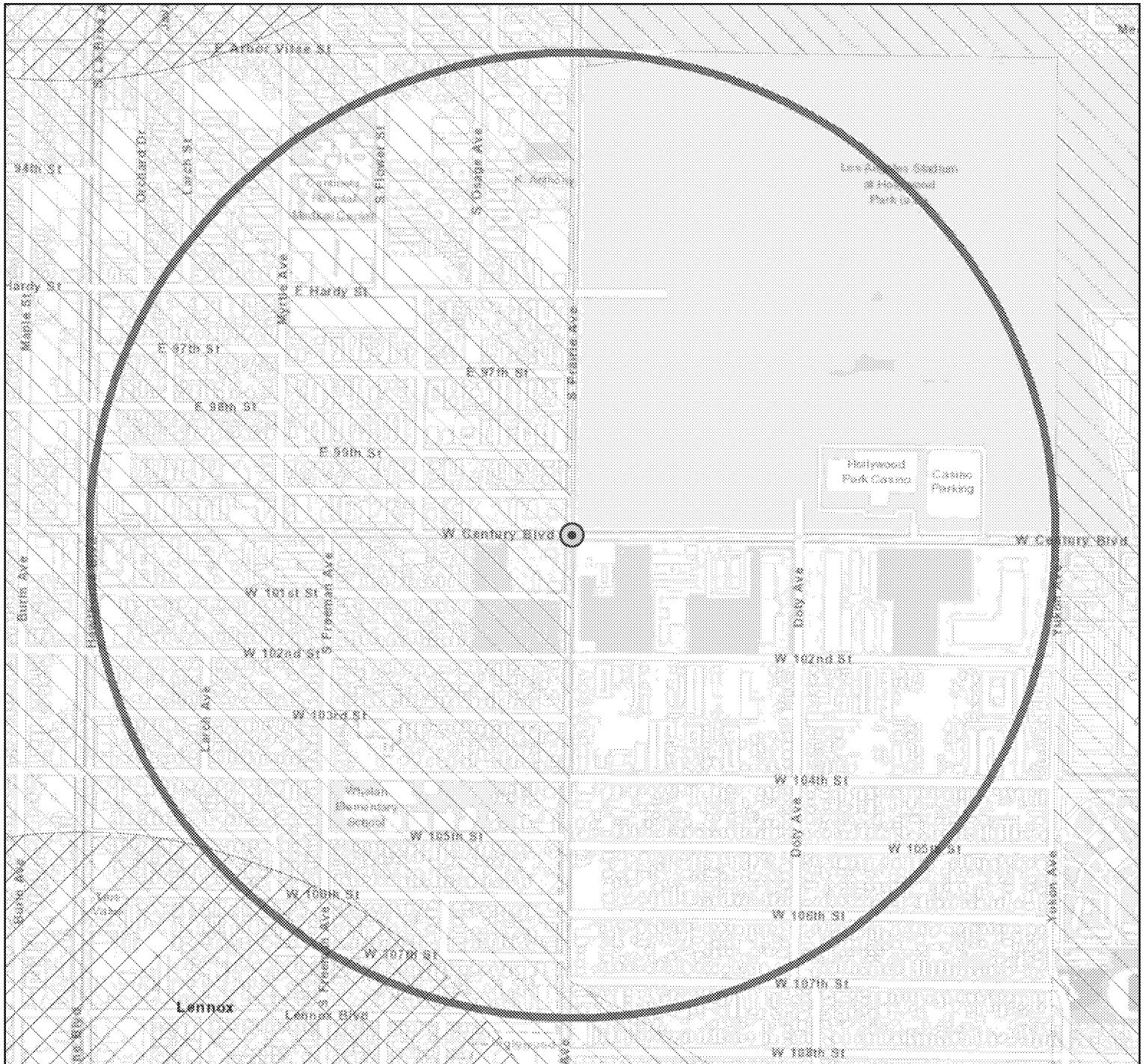


Please note this map depicts "high quality transit areas (HQTAs)" only within one-half mile radius around the intersection of W. Century Boulevard and S. Prairie Avenue and is based upon the review of the Southern California Association of Governments (SCAG) of 2016-2040 RTP/SCS amendment #2 transit network which are subject to change. This inventory is based on available information at the time regarding existing and planned transit service. However, transit agencies make adjustments to bus service on a regular basis. Users are encouraged to consult with their appropriate transit provider(s) to obtain the latest information on existing transit routes and frequencies. Please note this dataset may undergo changes as SCAG continues to update its transportation network and SCAG shall not be responsible for Latham & Watkins LLP's use of this map.

-  Intersection of W. Century Blvd. and S. Prairie Ave.
-  High Quality Transit Areas (2012)
-  One-Half Mile Radius Around the Intersection
-  Transit Priority Areas (2012)



High Quality Transit Areas (HQ TA) and Transit Priority Areas (TPA) One-Half Mile from Intersection of W. Century Blvd. and S. Prairie Ave. [Year 2040]



Please note this map depicts "high quality transit areas (HQTAs)" only within one-half mile radius around the intersection of W. Century Boulevard and S. Prairie Avenue and is based upon the review of the Southern California Association of Governments (SCAG) of 2016-2040 RTP/SCS amendment #2 transit network which are subject to change. This inventory is based on available information at the time regarding existing and planned transit service. However, transit agencies make adjustments to bus service on a regular basis. Users are encouraged to consult with their appropriate transit provider(s) to obtain the latest information on existing transit routes and frequencies. Please note this dataset may undergo changes as SCAG continues to update its transportation network and SCAG shall not be responsible for Latham & Watkins LLP's use of this map.





-  Intersection of W. Century Blvd. and S. Prairie Ave.
-  One-Half Mile Radius Around the Intersection
-  High Quality Transit Areas (2040)
-  Transit Priority Areas (2040)



EXHIBIT 9

UrbanFootprint Place Types

Urban Mixed Use



Land Use Mix

Residential	18%
Employment	16%
Mixed Use	45%
Open Space/Civic	21%

Built Environment

Intersections per mi ²	200
Average Floors	23
Floors Range	15 – 100
Total Net FAR	9.0

Gross Density Range (per acre)

Household	40-500+
Employee	50-500+

Residential Mix

SF Large Lot	0%
SF Small Lot	0%
Townhome	0%
MultiFamily	100%

Employment Mix

Office	80%
Retail	20%
Industrial	0%

Average Density (per acre)

Household	85
Employee	266

Description

Urban Mixed Use districts are exemplified by a variety of intense uses and building types. Typical buildings are between 10 and 40+ stories tall, with offices and/or residential uses and ground-floor retail space. Parking is usually structured below or above ground. Workers, residents, and visitors are well served by transit, and can walk or bicycle for many of their transportation needs.

Urban Residential



Land Use Mix

Residential	64%
Employment	4%
Mixed Use	12%
Open Space/Civic	21%

Built Environment

Intersections per mi ²	200
Average Floors	18
Floors Range	5 – 60
Total Net FAR	9.0

Gross Density Range (per acre)

Household	75-500+
Employee	0-50+

Residential Mix

SF Large Lot	0%
SF Small Lot	0%
Townhome	0%
MultiFamily	100%

Employment Mix

Office	22%
Retail	78%
Industrial	0%

Average Density (per acre)

Household	131
Employee	44

Description

The most intense residential-focused type, Urban Residential areas are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs.

Urban Commercial



Land Use Mix

Residential	1%
Employment	4%
Mixed Use	12%
Open Space/Civic	21%

Built Environment

Intersections per mi ²	200
Average Floors	15
Floors Range	15 – 100
Total Net FAR	6.0

Gross Density Range (per acre)

Household	0-40
Employee	250-500+

Residential Mix

SF Large Lot	0%
SF Small Lot	0%
Townhome	0%
MultiFamily	100%

Employment Mix

Office	93%
Retail	7%
Industrial	0%

Average Density (per acre)

Household	8
Employee	402

Description

Urban Commercial areas are typically found within major Central Business Districts. They are exemplified by mid- and high-rise office towers. Typical buildings are between 15 and 40+ stories tall, with ground-floor retail space, and offices on the floors above. Parking is usually structured below or above ground; workers tend to arrive by transit, foot or bicycle in large numbers.

UrbanFootprint Place Types

Mixed Office and R&D



Land Use Mix

Residential	0%
Employment	89%
Mixed Use	0%
Open Space/Civic	11%

Built Environment

Intersections per mi ²	45
Average Floors	2
Floors Range	1 – 6
Total Net FAR	0.8

Gross Density Range (per acre)

Household	0
Employee	25-150+

Residential Mix

SF Large Lot	0%
SF Small Lot	0%
Townhome	0%
MultiFamily	0%

Employment Mix

Office	82%
Retail	5%
Industrial	13%

Average Density (per acre)

Household	0
Employee	33

Description

Representing intense suburban office/industrial/research areas, Mixed Office and R&D is characterized by a mix of employment buildings. Typical structures are 1-6 stories tall, surrounded by surface parking and some structured parking where appropriate.

Office/Industrial



Land Use Mix

Residential	0%
Employment	92%
Mixed Use	0%
Open Space/Civic	8%

Built Environment

Intersections per mi ²	40
Average Floors	1
Floors Range	1 – 4
Total Net FAR	0.5

Gross Density Range (per acre)

Household	0
Employee	16-25

Residential Mix

SF Large Lot	0%
SF Small Lot	0%
Townhome	0%
MultiFamily	0%

Employment Mix

Office	23%
Retail	5%
Industrial	72%

Average Density (per acre)

Household	0
Employee	21

Description

Office/Industrial areas are moderate-density suburban office and industrial areas. Typical structures are 1-5 stories tall, surrounded by surface parking lots and truck loading bays.

Industrial Focus



Land Use Mix

Residential	0%
Employment	89%
Mixed Use	0%
Open Space/Civic	11%

Built Environment

Intersections per mi ²	35
Average Floors	1
Floors Range	1 – 2
Total Net FAR	0.5

Gross Density Range (per acre)

Household	0
Employee	8-16

Residential Mix

SF Large Lot	0%
SF Small Lot	0%
Townhome	0%
MultiFamily	0%

Employment Mix

Office	20%
Retail	14%
Industrial	66%

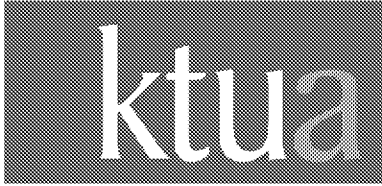
Average Density (per acre)

Household	0
Employee	14

Description

Industrial Focus areas are warehouses and industrial employment areas. Typical structures are 1-2 stories tall, surrounded by surface parking lots and truck loading bays.

EXHIBIT 10



3916 Normal Street
San Diego, CA 92103
619.294.4477
www.ktua.com
PLA 2342 | 2386 | 2500 | 3734

To: EcoTierra

Date: January 31, 2019

Reference: LEED Certification Review for the IBEC Project under AB 987

Attached to this memorandum is the summary of our research for the above referenced project. A point of reference, all blue text from this point forward, represents KTUA input whereas all black text is from the Applicants Report that we are responding to and commenting on.

Summary of LEED Credits

It is not possible to determine the accuracy of the credits without detailed site plans, data and more descriptions on what the applicant is likely to include in the project to attain these points. This memo assesses the LEED Points that are verifiable based upon public information and in the LEED Certification Study. The two categories KTUA has provided a different rating for (See Table 1 and Table 2) includes Access to Quality Transit (max. 6 points) and Bicycle Facilities

(max. 1 point). The basis of disagreeing with the applicants findings in these categories is that the indicated High Quality Transit Services are not within the required distances. Also, the applicant is relying too much on future shuttles and other means to collect 10% of visitors from light rail and transport them to the Arena. The applicant is counting on a future People Mover that is not adopted nor funded at this time or in the near future. The buses and shuttle systems are not able to deliver nearly the needed volume of users in a timely manner.

In addition, the bicycle facilities scoring assumes that the environment around the Arena is acceptable for cycling and/or has dedicated bike facilities that are existing or planned that will offset these problems. The existing and future conditions show Class 3 bike facilities within a mile of the Arena. Improved Class 1 and Class 2 facilities are several miles away. The Level of Stress as shown on these streets (see Figure 7), indicates that many riders will not want to ride on these wide, busy and unprotected streets. They are only usable streets for cycling if they have a Class 1 Multi-use Path, a Class 2 Bike Lane, or a Class 4 Cycle Track. Since these do not exist on the streets with a high level of stress, the overall biking environment is poor and there do not appear to be any plans to improve this. The second part of the LEED scoring on Bike Facilities are the accommodation of bike parking through racks, rooms, valet services or lockers. This part of the LEED points are Likely to be acceptable, but without the biking environment around the Arena being classified as low level of stress streets or without projects to improve these conditions, the LEED point is not warranted. Table 1 and 2 summarizes the appropriate adjustments to the LEED score card. Based on our assessment and as discussed below, when accurately assessed, the project fails to meet the 60 point minimum required for LEED Gold certification.

The suggested changes in the LEEDS Project Checklists would result in a reduction of the Access to Quality Transit from a 5 to a 2 on the BD+C New Construction Criteria and from a 6 to a 2 on the BD+C Core and Shell sheet. The changes also suggest that the Bicycle Facilities ranking goes from the Likely column (L) to the Unlikely column (U). In the case of the Core and Shell sheet, this would go from the Yes 1 to a Likely 1 since we do not feel this point is war-ranted. The Regional Priority on the Core and Shell sheet should not be counted under the Yes column for 1 point for Access to Quality Transit. We also feel that the Surrounding Density and Diverse Uses should go from the Unlikely (U) to the Likely (L) but without building footprint detail and density ranges, we were not able to confirm this.



Michael L. Singleton, President KTUA
LEED - AP, AICP, CTP and PLA

Table 1. Marked up Worksheet for New Construction and Major Renovation

LEED v4 for BD+C: New Construction and Major Renovation
IBEC Project Checklist

Target Certification: Gold
Anticipated Certification: Gold

Y	L	U	N	P	Points	Description	Requirement
				0	1	1	Innovative Process
				1	1	1	LEED for Neighborhood Development Location
				2	1	1	Sensitive Land Protection
				3	1	1	High Priority Site
				4	1	1	Surrounding Density and Diverse Uses
				5	1	1	Access to Quality Transit
				6	1	1	Bicycle Facilities
				7	1	1	Reduced Parking Footprint
				8	1	1	Green Vehicles
				9	1	1	Sustainable Sites
				10	1	1	Construction Activity Pollution Prevention
				11	1	1	Site Assessment
				12	1	1	Site Construction - Protect or Restore Habitat
				13	1	1	Open Space
				14	1	1	Rainwater Management
				15	1	1	Heat Island Reduction
				16	1	1	Light Pollution Reduction
				17	1	1	Water Efficiency
				18	1	1	Outdoor Water Use Reduction
				19	1	1	Indoor Water Use Reduction
				20	1	1	Building-Level Water Metering
				21	1	1	Outdoor Water Use Reduction
				22	1	1	Indoor Water Use Reduction
				23	1	1	Coating/Treater Water Use
				24	1	1	Water Metering
				25	1	1	Energy and Atmosphere
				26	1	1	Fundamental Commissioning and Verification
				27	1	1	Minimum Energy Performance
				28	1	1	Building-Level Energy Metering
				29	1	1	Fundamental Refrigerant Management
				30	1	1	Enhanced Commissioning
				31	1	1	Optimize Energy Performance
				32	1	1	Advanced Energy Metering
				33	1	1	Demand Response
				34	1	1	Renewable Energy Production
				35	1	1	Enhanced Refrigerant Management
				36	1	1	Green Power and Carbon Offsets
				37	1	1	Materials and Resources
				38	1	1	Storage and Collection of Recyclables
				39	1	1	Construction and Demolition Waste Management Planning
				40	1	1	Building Life-Cycle Impact Reduction
				41	1	1	Building Product Disclosure and Optimization - Environmental Product Declarations
				42	1	1	Building Product Disclosure and Optimization - Sourcing of Raw Materials
				43	1	1	Building Product Disclosure and Optimization - Material Ingredients
				44	1	1	Construction and Demolition Waste Management
				45	1	1	Indoor Environmental Quality
				46	1	1	Minimum Indoor Air Quality Performance
				47	1	1	Environmental Tobacco Smoke Control
				48	1	1	Enhanced Indoor Air Quality Strategies
				49	1	1	Low-Emitting Materials
				50	1	1	Construction Indoor Air Quality Management Plan
				51	1	1	Indoor Air Quality Assessment
				52	1	1	Thermal Comfort
				53	1	1	Interior Lighting
				54	1	1	Daylight
				55	1	1	Quality Views
				56	1	1	Acoustic Performance
				57	1	1	Innovation
				58	1	1	Innovation: Faculty/ Occupant Comfort Survey
				59	1	1	Innovation: Green Education Program
				60	1	1	Innovation: LEED C+M Starter Kit (Post Management + Green Cleaning Program)
				61	1	1	Innovation: Purchasing - Source 100% LED lamps
				62	1	1	Innovation: Design for active occupants
				63	1	1	LEED Accredited Professional
				64	1	1	Regional Priority
				65	1	1	Regional Priority: Enhanced Commissioning
				66	1	1	Regional Priority: Optimized Energy Performance
				67	1	1	Regional Priority: Outdoor Water Use Reduction
				68	1	1	Regional Priority: Indoor Water Use Reduction

Score: 58 (55) / 110
Suggested Adjustments: (circled '2' and '1' in 'Location and Transportation', 'Sustainable Sites', and 'Energy and Atmosphere' categories)

Table 2. Marked up Worksheet for Core and Shell

LEED v4 for BD+C: Core and Shell
IBEC Project Checklist

Target Certification: Gold
Anticipated Certification: Gold

Y	L	U	N	P	Points	Description	Requirement
				0	1	1	Innovative Process
				1	1	1	LEED for Neighborhood Development Location
				2	1	1	Sensitive Land Protection
				3	1	1	High Priority Site
				4	1	1	Surrounding Density and Diverse Uses
				5	1	1	Access to Quality Transit
				6	1	1	Bicycle Facilities
				7	1	1	Reduced Parking Footprint
				8	1	1	Green Vehicles
				9	1	1	Sustainable Sites
				10	1	1	Construction Activity Pollution Prevention
				11	1	1	Site Assessment
				12	1	1	Site Development - Protect or Restore Habitat
				13	1	1	Open Space
				14	1	1	Rainwater Management
				15	1	1	Heat Island Reduction
				16	1	1	Light Pollution Reduction
				17	1	1	Terraced Design and Construction Guidelines
				18	1	1	Water Efficiency
				19	1	1	Outdoor Water Use Reduction
				20	1	1	Indoor Water Use Reduction
				21	1	1	Building-Level Water Metering
				22	1	1	Outdoor Water Use Reduction
				23	1	1	Indoor Water Use Reduction
				24	1	1	Coating/Treater Water Use
				25	1	1	Water Metering
				26	1	1	Energy and Atmosphere
				27	1	1	Fundamental Commissioning and Verification
				28	1	1	Minimum Energy Performance
				29	1	1	Building-Level Energy Metering
				30	1	1	Fundamental Refrigerant Management
				31	1	1	Enhanced Commissioning
				32	1	1	Optimize Energy Performance
				33	1	1	Advanced Energy Metering
				34	1	1	Demand Response
				35	1	1	Renewable Energy Production
				36	1	1	Enhanced Refrigerant Management
				37	1	1	Green Power and Carbon Offsets
				38	1	1	Materials and Resources
				39	1	1	Storage and Collection of Recyclables
				40	1	1	Construction and Demolition Waste Management Planning
				41	1	1	Building Life-Cycle Impact Reduction
				42	1	1	Building Product Disclosure and Optimization - Environmental Product Declarations
				43	1	1	Building Product Disclosure and Optimization - Sourcing of Raw Materials
				44	1	1	Building Product Disclosure and Optimization - Material Ingredients
				45	1	1	Construction and Demolition Waste Management
				46	1	1	Indoor Environmental Quality
				47	1	1	Minimum Indoor Air Quality Performance
				48	1	1	Environmental Tobacco Smoke Control
				49	1	1	Enhanced Indoor Air Quality Strategies
				50	1	1	Low-Emitting Materials
				51	1	1	Construction Indoor Air Quality Management Plan
				52	1	1	Indoor Air Quality Assessment
				53	1	1	Thermal Comfort
				54	1	1	Interior Lighting
				55	1	1	Daylight
				56	1	1	Quality Views
				57	1	1	Acoustic Performance
				58	1	1	Innovation
				59	1	1	Innovation: Green Training for Contractors, trades, operators
				60	1	1	Innovation: Green Education Program
				61	1	1	Innovation: LEED C+M Starter Kit (Post Management + Green Cleaning Program)
				62	1	1	Innovation: Purchasing - Source 100% LED lamps
				63	1	1	Innovation: Integrated transportation management plan
				64	1	1	LEED Accredited Professionals
				65	1	1	Regional Priority
				66	1	1	Regional Priority: Indoor Water Use Reduction
				67	1	1	Regional Priority: Optimized Energy Performance
				68	1	1	Regional Priority: Rainwater Management
				69	1	1	Regional Priority: Access to Quality Transit

Score: 56 (52) / 110
Suggested Adjustments: (circled '2' in 'Energy and Atmosphere' category)

APPLICANT'S DESCRIPTION OF THE PROJECT

The project applicant proposes the construction of a new basketball and entertainment center and related development in the City of Inglewood, California to serve as the new home of the LA Clippers National Basketball Association (NBA) franchise. The IBEC Project consists of an arena with up to 18,000 fixed seats for LA Clippers basketball games, with capacity to add up to 500 additional temporary seats for other events. The proposed IBEC Project Site is shown in Figure 1. Inglewood Basketball and Entertainment Center Project Site Plan. In addition, the proposed IBEC Project includes a new LA Clippers practice and athletic training facility, LA Clippers team offices, a sports medicine clinic, community space, and ancillary retail and dining uses as shown in Table 3. The proposed IBEC Project also includes the option to develop a hotel of up to 150 rooms within the IBEC Project Site.

Table 3. IBEC Project Land Uses

Land Use	Size
Arena:	18,000 fixed seats with capacity to add 500 temp. seats
LA Clippers Practice / Athletic Training Facility:	85,000 SF
LA Clippers Offices:	71,000 SF
Sports Medicine Clinic:	25,000 SF
Dining and Retail Space:	48,000 SF
Community Space:	15,000 SF
Hotel:	150 rooms

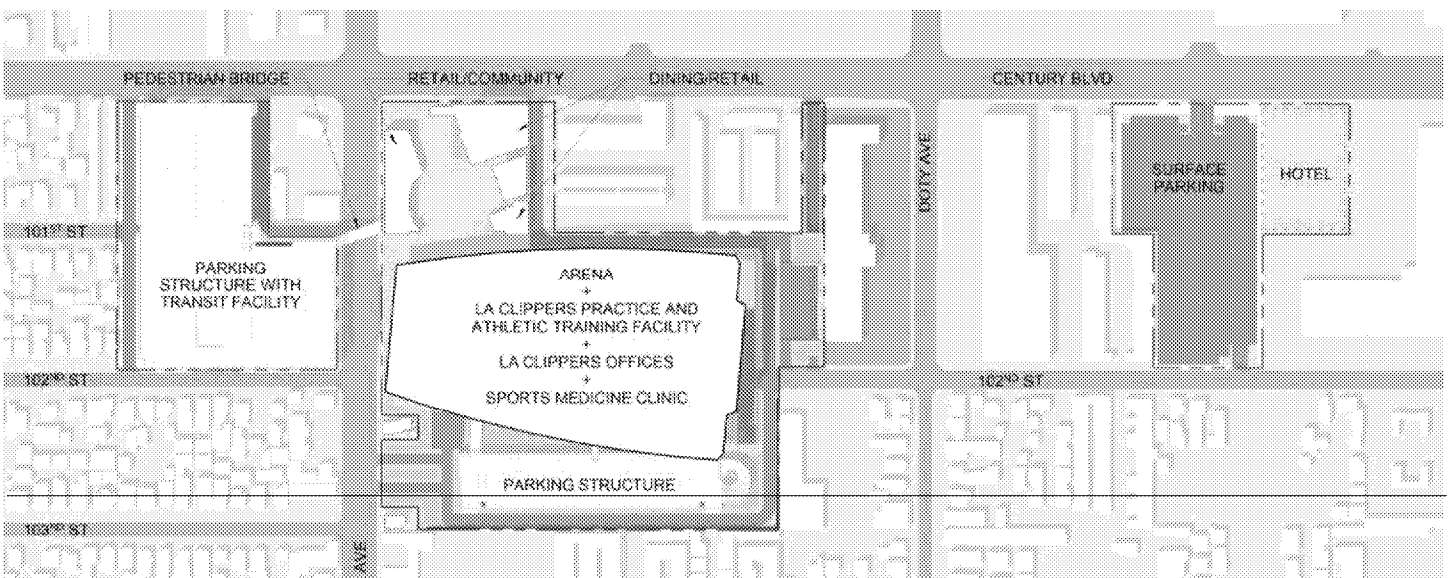


Figure 1. IBEC Project Land Uses

Figure 2 on the following page shows the project site in context with the transportation improvements around the site. Each blue dot indicates a bus stop. The transit stops in the immediate area, including on West Century Boulevard and South Prairie Avenue, would not be considered to be a high frequency or high level of transit service. Table 4 shows the number of transit stops that are in each of the walksheds shown on Figure 2 and 3. These walkzones are based on the actual distance a pedestrian can walk assuming a 2.5 mile an hour speed and limited impedance at intersections. Using a radius circle for these distances is not an accepted practice since pedestrian movement is along streets that are in a grid pattern and not in a radius. A pedestrian cannot walk as the “crow flies”, but must follow streets and walk around barriers such as canyons, freeways, railroads, and other elements.

For typical commitments of time, assuming the willingness to walk for 15 minutes for a special event, the one mile walking distance or a 3/4 mile walking distance is not feasible for most trips for special events. A 1/2 mile is the best target to assume for the limits of transit service. The higher level of transit service based on frequency, priority, and overall quality of the service occurs just beyond the 1/2 mile distance to the destinations at the arena. This is measured down West Century Boulevard from the northwest corner of the commercial destinations. Although a parking garage would be located to the west of the arena destinations, a parking structure is not the destination for those coming by transit and should therefore not be used to measure the distance to the high frequency quality service.

The capacity of local bus service is such that only a very small percentage of potential visitors could be accommodated on normal schedules assuming normal seating capacities and some level of transit riders already on the bus that are not destined to the arena. Also, many of the bus schedules in the area do not include Sunday service or have limited evening schedules.

Higher frequency and capacity does exist on the Metro Green Line, but this service is well beyond the 1/2 mile maximum most pedestrians are willing to walk. Even at the one mile distance, the closest Metro station is still another 700 feet away (see Figure 3). A shuttle system is planned to be put into place, however its capacity for handling larger volumes of event participants would be severely limited. Each time a transfer has to occur, transit ridership is lost. Each time a person has to wait for multiple regularly scheduled buses, the chance of that person taking transit in the future again to the arena goes down, especially if they missed or were late to the event.

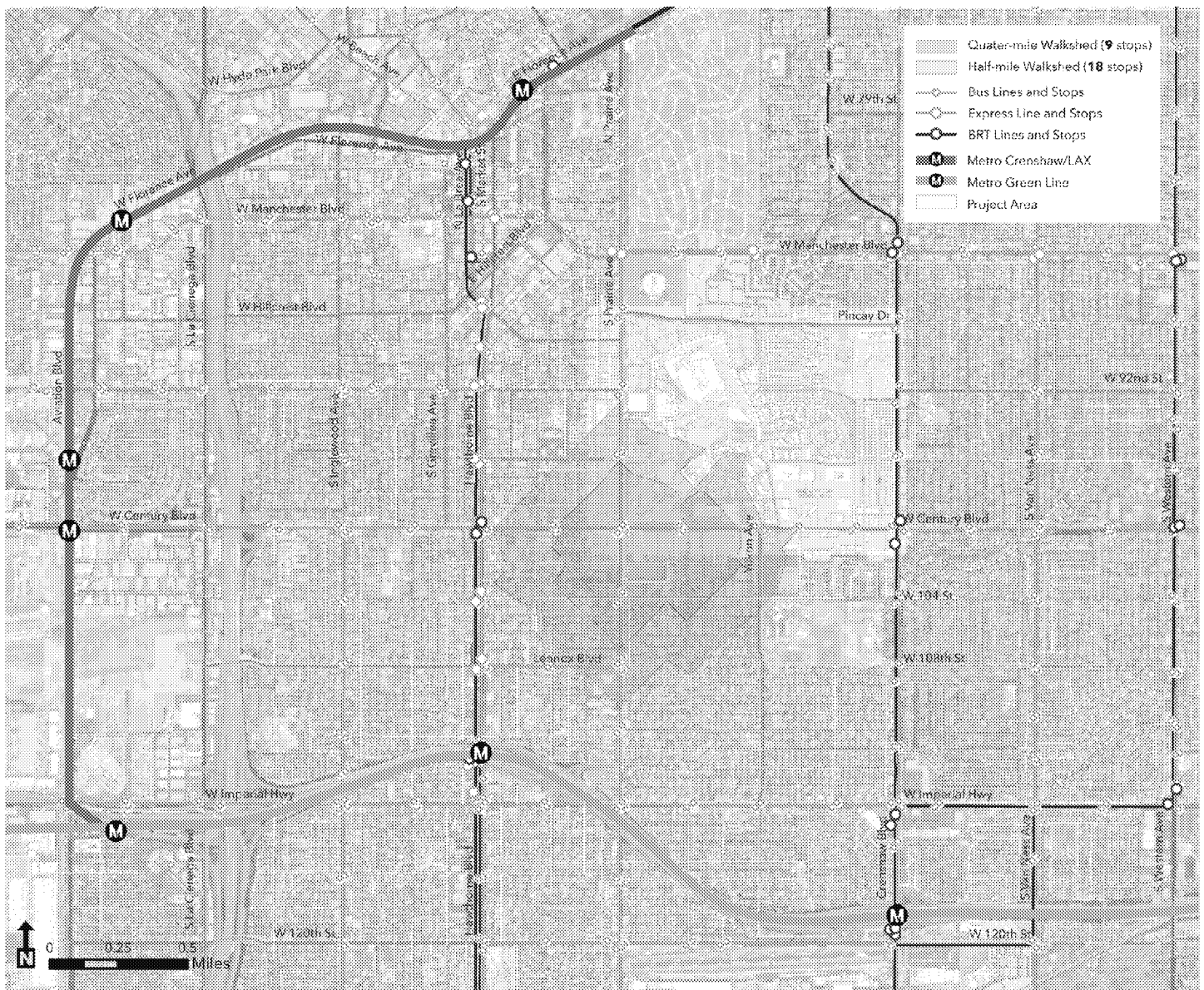
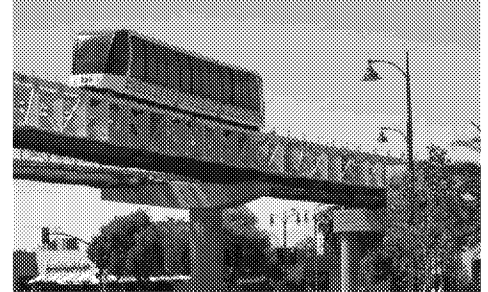


Figure 2. Vicinity Map with Transit and Walktime Zones

The future condition for transit includes the Crenshaw/LAX line planned for completion by 2024. However, this line under construction does not close the first mile/last mile gap that exists. Gaps to the three potential Metro stations are all beyond one mile. One would require another mile, one 1.8 miles, and the third 0.8 miles. Three alternative people mover routes have been proposed leading to the LA Stadium and the proposed Inglewood Basketball and Entertainment Center. These could close the gap for these first and last mile requirements. However, the direct commitment of funding on these projects that are in the planning phases makes it questionable if the arena project is in control or has committed to pay for these systems. The timing appears to be beyond the 24 months after entitlement of the proposed IBEC project. The concept is not part of any long range approved plan nor is a funding source yet identified so it cannot be counted.

Table 4 analyzed all transit services in the area and compared them with the distances of getting attendees from the arena to the bus. Table 2 compares each route with the walkshed distances required to connect the transit stops with the arena. As shown, only two points should have been provided by the LEED scoring evaluation project checklist. Table 3, also shows the number of transit facilities that fall within each walkshed area. Therefore, making a claim that multiple transit services are within a viable walking distance is questionable. Without direct control, funding or formal required mitigation requirements, the transit credit for Access to Quality Transit is flawed and this category should not receive six LEED points.



People Mover sample from Oakland CA.

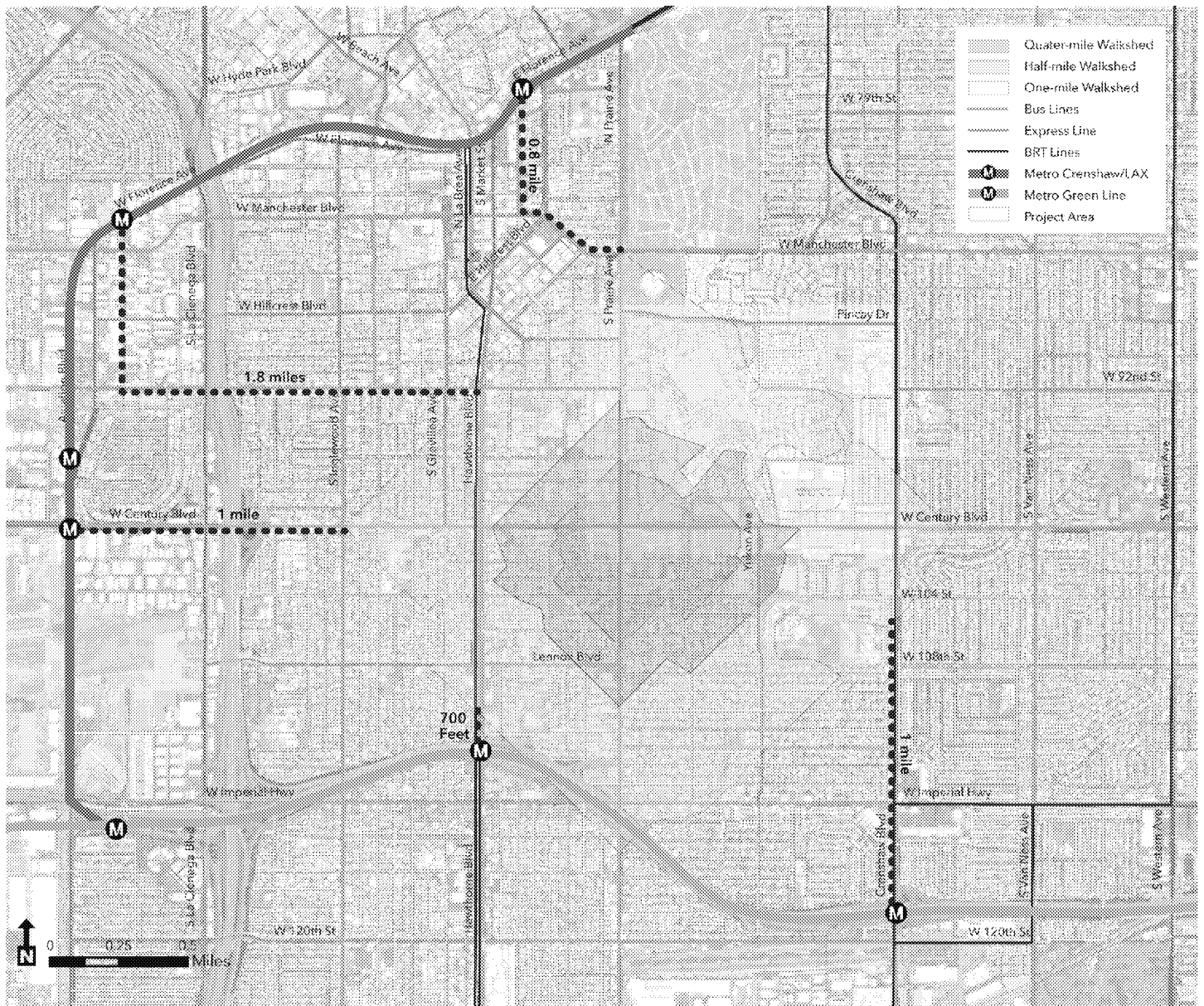


Figure 3. Vicinity Map with Walktime Zones showing distance shortages to Quality Transit Services

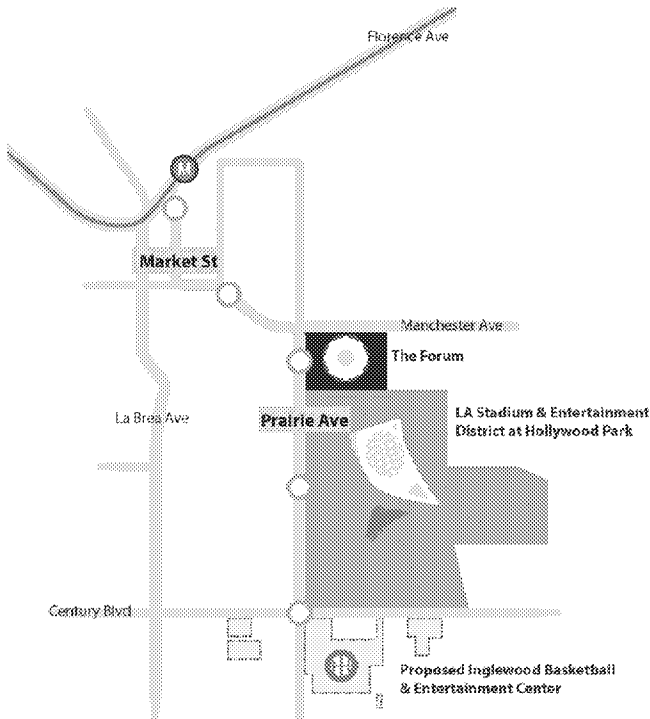


Figure 4. Proposed People Mover from the Metro Station to IBEC

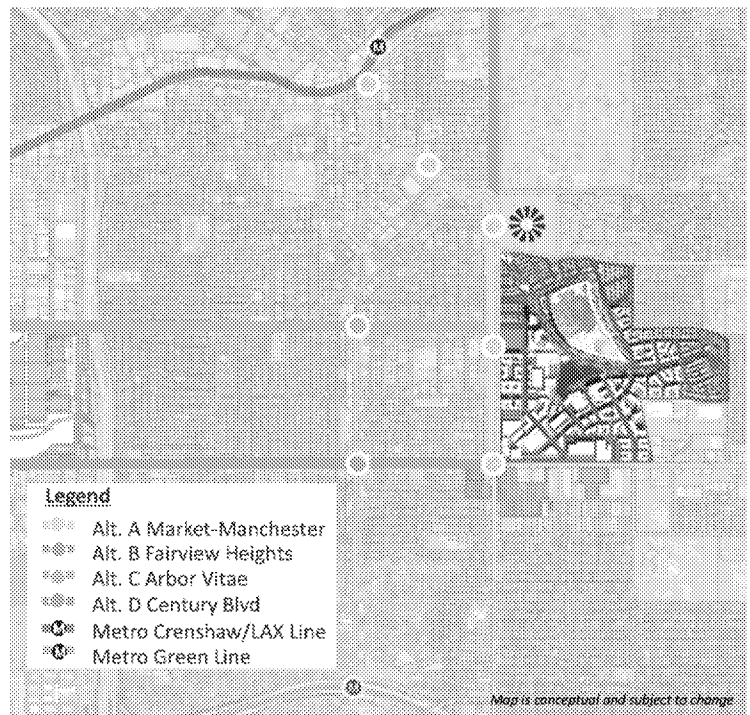


Figure 5. Alternative Routes for the Proposed People Mover from the Metro Station to IBEC

Both weekday and weekend trip minimums must be met						
Requirement		Weekday Trips	Weekend Trips	SAT Trips	SUN Trips	Points
Bus		72	40			1
		144	108			3
		360	216			6
BRT & Commuter Rail		24	6			1
		40	8			2
		60	12			3
Network Buffer						
Line	Distance	Weekday Trips	Weekend Trips	SAT Trips	SUN Trips	Points
Bus 117	1/4-Mile	55	35	40	35	
Bus 211	1/4-Mile	11	0	0	0	
Bus 212	1/4-Mile	74	43	58	43	
SUM		140	78			1
Radius buffer						
Line	Distance	Weekday Trips	Weekend Trips	SAT Trips	SUN Trips	Points
Bus 117	1/4-Mile	55	35	40	35	
Bus 211	1/4-Mile	11	0	0	0	
Bus 212	1/4-Mile	74	43	58	43	
SUM		140	78			1
BRT 740	Right beyond 1/2-Mile	41	0	39	0	
Exp 442	Right beyond 1/2-Mile	4	0	0	0	
Sum		45	0	39	0	0
Additional Qualification	Projects served by two or more transit routes such that no one route provides more than 60% of the documented levels may earn one additional point, up to the maximum number of points.					1
Total Points Earned						2

Table 4. Access to Standard and High Quality Transit Service

Existing and Planned Transit Network

- The IBEC Project Site is located along two multi-modal corridors, W. Century Blvd. and S. Prairie Ave., and includes access to transit. In particular, multi-modal access to the Project Site is available in the form of local bus service, automobile access, and a pedestrian network comprised of continuous sidewalks, curb ramps, and painted crosswalks at area intersections. Local bus service is currently provided by the Metro at 8 Metro stops within a ¼-mile of the Project Site along the following four Metro routes: 117, 211, 212, and 312. The Bus Rapid Transit (BRT) Line 740 Hawthorne/Century transit stop is located approximately 0.5 miles west of the Project Site.
 - › *The BRT line that is critical in defining "High Quality Transit" services is more than ½ mile from the corner of the destination located on the southeast corner of W. Century Blvd. and S. Prairie Avenue. This corner is the entrance into the Retail Community. The parking structure west of this location, although part of the project parcels, is simply a parking structure with drop off locations for shuttles. There are no destinations that a pedestrian or cyclist coming from the Hawthorne BRT would stop at for any reason. Even if there are bike storage facilities, the cyclist would still need to walk to the Retail Community or other side entrances into the arena. This last segment walk for the cyclist would need to be added to the overall distance from the destination to the BRT facility.*

- The existing and planned fixed guide-way network in the City of Inglewood includes several rail stops that would provide access to the IBEC Project. Metro’s existing and planned fixed guide-way network includes several rail stops that would provide access to the proposed IBEC Project. The Project Site is located approximately 0.8 miles from the existing Metro Green Line Hawthorne Station.
 - › *Using the proper walktime GIS tools, this station is 1.1325 miles from the south western most entry point into the project.*

- Future transportation network improvement includes the LA Metro Crenshaw/LAX project. The LA Metro Crenshaw/LAX project is an 8.5-mile light rail line between the Metro Green Line and Exposition Line serving the cities of Los Angeles, Inglewood and El Segundo and is planned to be open in 2019. Three stations associated with the Metro Crenshaw/LAX Line are planned in the City of Inglewood: the Downtown Inglewood Station located approximately 1.6 miles to the north of the IBEC Project Site, the Westchester/Veterans Station located approximately 2 miles northwest of the Project Site, and the Fairview Heights station located approximately 2 miles north of the Project Site. Once completed, the Crenshaw/LAX Line and the existing Green Line (with operational updates) will both stop at the future Airport Metro connector (AMC) 96th Street Transit Station which is located approximately 2.0 miles west of the Project Site.
 - › *The Downtown Inglewood Station is 1.8 miles based on the walking routes. The Westchester/Veterans Station is 2.8 miles and the Fairview Heights Station is 2 miles as listed above.*

Walkshed (walking at about 3 mph)	Bus Stops	Express/BRT Stops	Bus Lines	Express/BRT Lines
¼-Mile walkshed (5-minute-walk)	9	0	3	0
½-Mile walkshed (10-minute-walk)	18	0	3	0
One Mile walkshed(20-minute-walk)	59	Express 10 / BRT 4	11	Express 1 / BRT 3

Table 5. Access to Standard and High Quality Transit Service by Walkshed

Location and Transportation. The IBEC Project would be eligible for credits in the location and transportation category in the following areas:

- The IBEC Project would be eligible to achieve the Access to Quality Transit credit because local transit service to the project area would be provided by the Los Angeles Metropolitan Transportation Authority (Metro) in the form of future below- and at-grade light rail on the Metro Crenshaw/LAX Line, which is currently under construction and expected to be complete in 2019, along with other above-ground route bus services.
- › *Access to the Metro Crenshaw/LAX Line is much greater than the ½ mile limit in distance required by LEED. The distance from the Southeast corner of W. Century Boulevard and South Prairie Avenue is 1.08 miles.*
- The IBEC Project would provide a shuttle pick-up and drop-off service at the following three Metro rail stations: the existing Metro Green Line - Hawthorne Station, and the future Metro Crenshaw/LAX Line – Florence/La Brea Station and Metro Crenshaw/LAX Line – AMC 96th Street Stations. In addition, the IBEC Project is located within ¼ mile of 8 existing Metro bus stops along the following four Metro routes, 117, 211, 212, and 312.
- › *The shuttle and existing buses and express buses (which includes coaches and other micro-transit solutions) will be used to connect transit riders from the Metro Line to the LA Stadium. However, this layering of transit mode to transit mode that allows for claiming the high level of service needs to have some limitation. Transit ridership drops off when multiple mode transfers create additional dwell time waiting for other buses or modes. In addition, the capacity of the shuttles and buses is not great enough to keep up with the number of attendees that could fit on the Metro Crenshaw LAX or Green lines. Each light rail line can deliver hundreds of potential attendees to these station sites. Proposed buses and shuttle systems would only be able to handle a percentage of these transit users without long dwell times waiting for an empty bus or shuttle.*
- › *The bus stops that are within the area are not considered to be Quality Transit since their capacities are very limited and a significant number of potential attendees would overwhelm the capacity on these regularly scheduled buses, causing waits for multiple cycles of buses. This could result in headways that could add up to 30 minutes to an hour of dwell time at these stations. Although there are some expanded bus services in the area, such as express buses and BRT systems, they all exceed the 1/2 mile walktime (based on true walking distances) limits identified in LEED.*

Other LEED Credit Discussions in the AB 987 Application

Continuing with the application in the order it is discussed in the application, the following observations are made:

- The IBEC Project would also provide electric vehicle charging stations at 8% of parking spaces, which would exceed the requirements for the IBEC Project to be eligible for the Green Vehicles credit.
- › *Although this is a good sustainable goal, it will not have any affect on reducing traffic congestion.*
- Sustainable Sites. The IBEC Project would be eligible for credits for rainwater management, open space, heat island reduction, and light pollution reduction. Credits for open space are based on the percentage of permeable surfaces, including roof-top gardens.
- › *Open space would not be considered as usable open space if it were on inaccessible rooftop gardens. It is not possible at this time to determine the amount of the site that will be covered in non-permeable surfaces compared to non-permeable surfaces. It is difficult to see how the project could obtain this credit based on the level of detail the applicant has provided.*
- Water Efficiency. The IBEC Project would be eligible for credits for the use of ultra-low flow fixtures in restrooms such as low flow faucets with aerators, dual flush toilets, and waterless urinals. These features would reduce indoor water use by a minimum of 40 percent and would be required to meet Universal Plumbing Code standards. The IBEC Project would also be eligible for credits for using 100% recycled water to service project landscaping designed for low water usage.
- › *There is no evidence in the application indicating that an existing reclaimed water plant is nearby or that a reclaimed water distribution line is in this area of Inglewood.*

Under the requirements of AB 987, the IBEC Project must include implementation of a transportation demand management that will achieve and maintain a 15% reduction in the number of vehicle trips, collectively, by attendees, employees, visitors, and customers as compared to trips generated by IBEC Project operations absent the transportation demand management program. The measures included in the transportation demand management program must be implemented as soon as feasible, so that a 7.5% 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 IBEC Project arena, anticipated to occur by June 2025.

- Information to show that the transportation demand management program, upon full implementation, will achieve and maintain a 15% reduction in the number of vehicle trips, collectively, by attendees, employees, visitors, and customers as compared to operations absent the transportation demand management program.

› *It is likely that the applicant calculated the requirements of the TDM program and reverse engineered the requirements for a mixture of local bus, express bus, BRT, light rail, shuttles and micro-transportation that will add up to the 15%. However, there are no studies or discussions to determine if these systems can meet the capacity of handling 2,900 persons (19,320 maximum persons *15%) within a short window of time, which would generally be a one hour window to collect and distribute all of these persons prior to game starts. Also, no traffic discussion exists on if these connector transportation systems can make their way through traffic-congested areas to allow for multiple trips in this one hour time-frame. Also, there are no discussions on demographics, mode share shifts or other factors to test the hypothesis that 15% of the attendees would be persuaded to use these systems, even with incentives from the TDM program.*

Information to show the project is 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.

California Senate Bill (SB) 375 was passed by the State Assembly on August 25, 2008, and signed into law by the Governor on September 30, 2008. This legislation links regional planning for housing and transportation with the greenhouse gas (GHG) reduction goals outlined in California Assembly Bill (AB) 32. Under SB 375, each Metropolitan Planning Organization (MPO) is required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled (VMT) and trips so that the region will meet a target, created by the California Air Resources Board (CARB), for reducing GHG emissions.

The purpose of the 2016 RTP/SCS is to achieve its assigned regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375 through strategies for integrating transportation and land use planning, and an overall land use pattern that encourages growth in infill locations near bus corridors and other transit infrastructure⁴. The land use pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management (TDM) measures.

The 2012 RTP/SCS and the 2016 RTP/SCS include strategies and principles that are relevant to the IBEC Project, such as:

- Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full- range of shopping, entertainment and services all within a relatively short distance;
- Encourage compact growth in areas accessible to transit;
- Identify regional strategic areas for infill and investment;
- Plan for jobs closer to transit and housing, in sustainable transit-ready infill areas that can be reached by planned transit service and can readily access existing infrastructure;
- Develop strategies focused on high-quality places, compact infill development, and more housing and transportation choices;
- Encourage development in High Quality Transit Areas (HQTAs) and along “Livable Corridors”;
- Develop nodes on a corridor - intensify nodes along corridors with people-scaled, mixed- use developments;
- Promote the use of TDM programs; and
- Invest in biking and walking infrastructure to improve active transportation options and transit access.

The IBEC Project is consistent with and furthers these strategies and principles as follows:

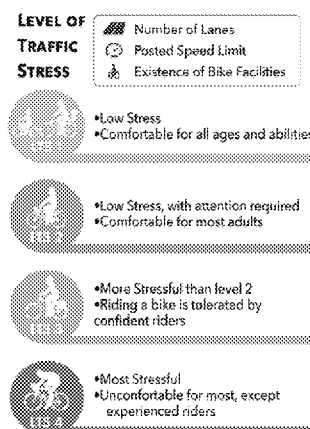
- Consistent with the RTP/SCS, the IBEC Project would be infill development, as explained above, and proposes a dense mix of recreation and entertainment, office, retail, restaurant, community, and hotel uses consistent with compact growth, on parcels of infill urban land accessible to and served by public transit and near existing and planned housing. The IBEC Project has been designed with the complete communities concept in mind by integrating land use planning, transportation planning, and community design together, and by providing construction and permanent jobs for a variety of skills and education, recreational and cultural events, and a full-range of shopping, entertainment and services all within a relatively short distance.
- The IBEC Project meets the HQTA criteria of being within one half mile of a fixed guide-way transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.¹⁴ The Project Site is adjacent to two (the 117 and 212/312 lines, which stop at the intersection of West Century Boulevard and South Prairie Avenue) and within one half mile of a third (the combined 740/40) Metro bus routes that are corridors that pick up passengers at intervals of 15 minute or less during peak commute hours. A fixed light rail system with a station adjacent to the IBEC Project Site is currently in the planning phase and, if approved, would be a major transit node to service the Project Site and surrounding uses.
 - › *The 740/40 line is not within one half mile of the IBEC project site destinations when the parking structure is excluded. The parking structure should not be the origin of measurement since a transit user's destination is not the projects' non-contiguous parking structure.*
- In addition to the Project Site's proximity to the Metro bus routes and potential light rail system described above, it is less than one mile from the Los Angeles County Metropolitan Transportation Authority (Metro) Green Line's Hawthorne/Lennox Station. The Metro Green Line provides light rail service between Redondo Beach and Norwalk, and also serves the communities of El Segundo, Hawthorne, South Los Angeles, Lynwood, and Downey.
 - › *The existing and future Metro Light Rail System station locations are all more than one mile away from the project site when accurate distances for pedestrian pathways and sidewalks are used to determine this distance. Using actual walktime measured by available walkways is the commonly accepted professional practice when calculating walk times.*

- Currently under construction, the Metro Crenshaw/LAX Line will provide a new light rail connection between the existing Metro Exposition Line and the Metro Green Line. The Crenshaw/LAX Line will serve the cities of Los Angeles, Inglewood, Hawthorne, and El Segundo, and portions of unincorporated Los Angeles County. The Crenshaw/LAX Line will also provide light rail service to LAX. Three stations associated with the Metro Crenshaw/LAX Line are planned in the City of Inglewood: the Downtown Inglewood Station located approximately 1.6 miles to the north of the Project Site, the Westchester/Veterans Station located approximately 2 miles northwest of the Project Site, and the Fairview Heights station located approximately 2 miles north of the Project Site. Construction of the Metro Crenshaw/LAX Line is estimated to be completed in 2019, before construction of the proposed IBEC Project would begin.

› The Downtown Inglewood Station is 1.8 miles based on the walking routes. The Westchester/Veterans Station is 2.8 miles and the Fairview Heights Station is 2 miles as listed above. These measurements are more accurate distances since they utilize the actual existing pedestrian pathways and sidewalks to determine this distance, which is the commonly accepted professional practice when calculating walk times.

- In addition, the IBEC Project will provide a substantial number of jobs near transit, at an infill location along a Livable Corridor. Livable Corridors are defined as “arterial roadways where jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.”

› The critical question is whether High Quality Transit Services are within the required distances. Our measurements say they are not. Also, is the method of connecting the further away transit stops to the project adequate given the high peak demands of transferring a transit user from a light rail system to a bus or shuttle system for this first and last mile connection. We would not characterize the area as having a dedicated bikeway system. Figure 6 shows that the only bike facilities that exist or are planned within the first mile of the project site are actually shared road facilities known as Class 3 bike routes, Class 3 sharrows or Class 3 Bikeway Boulevards. These are unimproved facilities that indicate to the driver that the lane is shared with the cyclist. They are not dedicated bike facilities. Only Class 1 Multi-use paths and Class 4 Cycle Tracks are considered dedicated and protected facilities. Class 2 Bike Lanes and Class 2 Buffered Bike Lanes are considered to be dedicated but unprotected bike facilities. As can be seen on Figure 7, Class 2 bike lanes are generally 1.5 to 2 miles from the site and Class 1 multi-use paths are over 2 miles away. Neither connect to the project site. Figure 7 is a GIS analysis of the biking conditions that each of the roadway systems represent in terms of level of stress for a cyclist to use this facility. These stress levels are the major factor in determining if an individual is likely to utilize a street. All but approximately 8% of the population will not ride on streets that are considered to have a LOS of 3 or 4. These stress levels are determined mostly by traffic volume and posted or observed speeds. They are also determined by the street geometry, the number of driveways (which result in right and left turning movements across a cyclists direction of travel) and the types of right turn lane movements and the types of signal control for oncoming left turn movements. Statistics have clearly shown a much higher level of collision, injuries and fatalities on these street types. Although the data layers that go into this analysis could be supplemented with more detailed site analysis, this is the generally accepted professional practice in determining if a street needs a Class 1, 2, 3 or 4. As can be seen on Figure 7, the project study area is dominated by LOS 4 categories. Only a few percent of seasoned cyclists will likely ride LOS 4 streets. For example, the proposed Class 3 bike facilities proposed for Lennox Boulevard are not appropriate for a LOS 3 categorized street. This treatment is not a dedicated, buffered or protected facility, but is simply a route marked by signs and now often marked by Sharrows in the street.



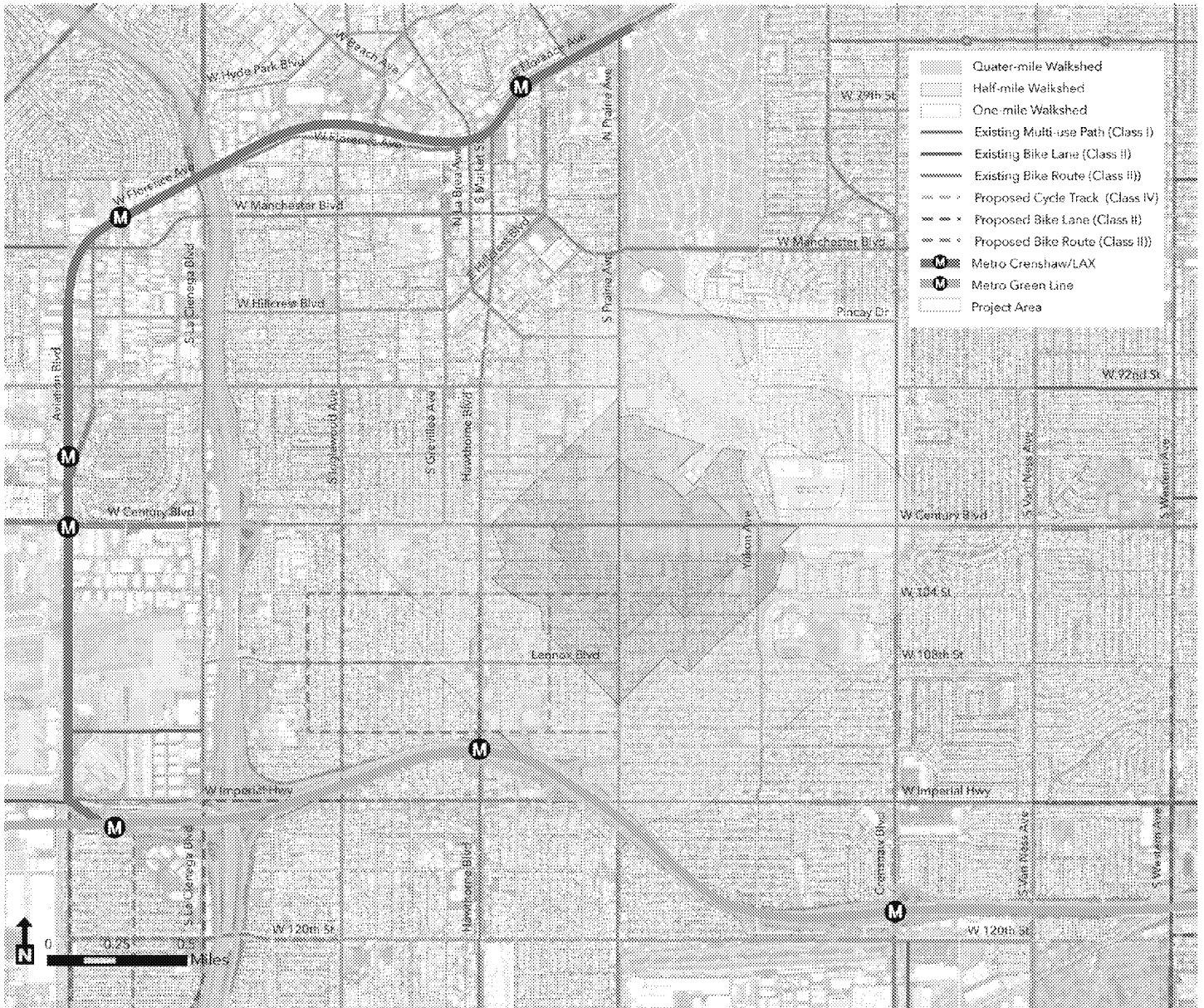


Figure 6. Walktime Overlays with Bike Facilities Shown

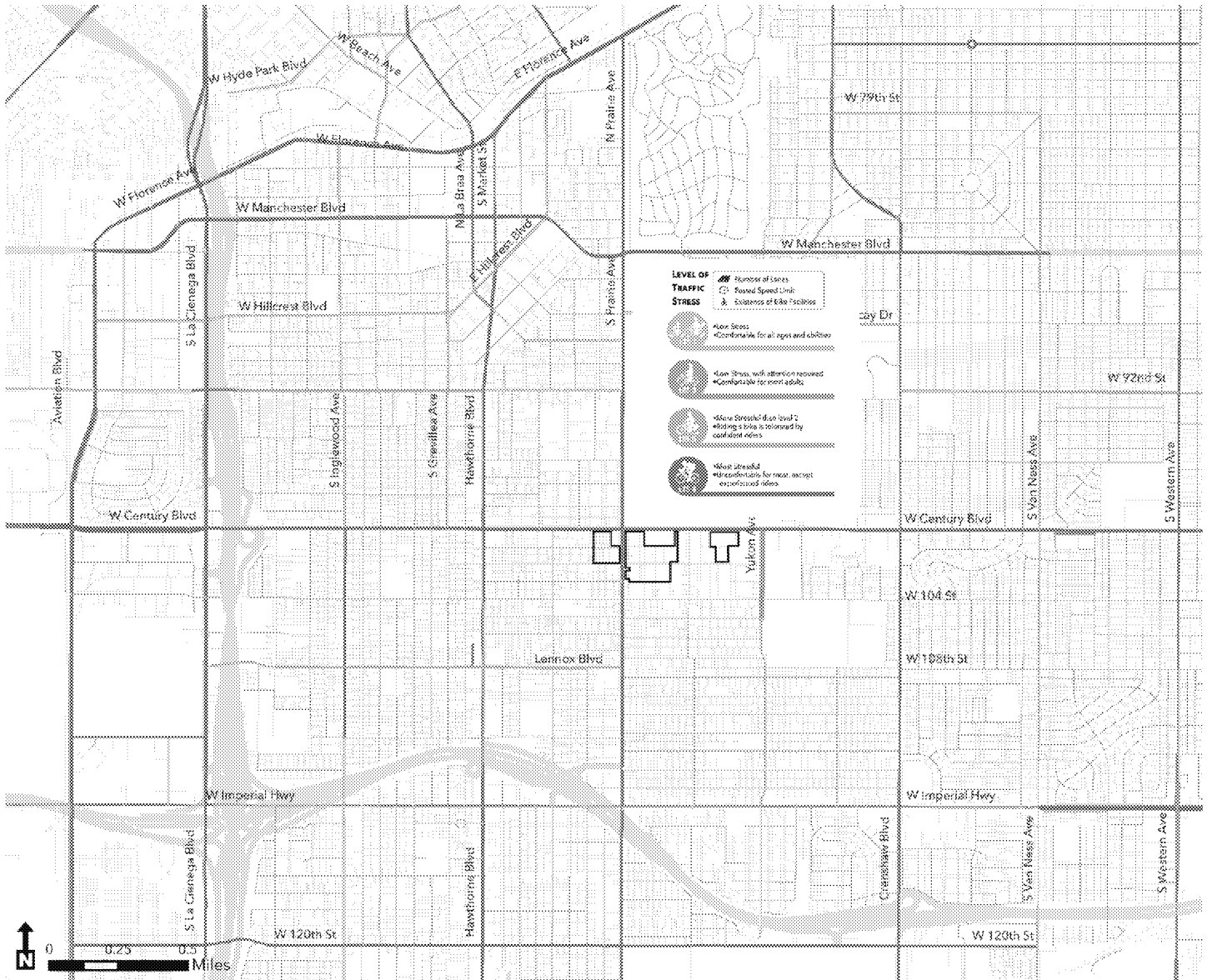


Figure 7. Level of Traffic Stress for Cyclist based on Street Characteristics