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February 21, 2018

Kate Gordon, Director
Office of Planning and Research
1400 10th Street
Sacramento, CA 95814

via email: california.jobs@opr.ca.gov

Re: Inglewood Basketball and Entertainment Center (App. No. 2018021056) – OPPOSE CERTIFICATION

Dear Director Gordon:

Climate Resolve is a Los Angeles-based nonprofit organization that is dedicated to local solutions to global climate change and ensuring that climate solutions benefit all, especially low-income communities most affected but least able to defend against the impacts from climate change. Founded in 2010, Climate Resolve works to make California more equitable, just, livable, prosperous, and sustainable today and for generations to come by inspiring people at home, at work, and in government to reduce climate pollution as well as prepare for climate impacts.

We write to share our concerns regarding the Los Angeles Clippers' application under AB 987 for the Inglewood Basketball and Entertainment Center ("IBEC Project"). Specifically, the Project's disregard for AB 987's requirements that it reduce greenhouse gas emissions and that it improve air quality conditions for the adjacent low-income community.

Where AB 987 offers benefits under CEQA in exchange for projects' achieving well-defined environmental standards, the IBEC Project application simply does not meet AB 987's strict requirements.

Unless properly characterized and mitigated, the IBEC Project would actually *increase* greenhouse gas emissions and disproportionately impact Inglewood's low-income community. Moreover, we are concerned that, if certified by the Governor, the IBEC Project would create a terrible precedent that would gut, in large part, California's ability to use CEQA to manage greenhouse gas emissions. As California strives to achieve climate neutrality by 2045, it is imperative that CEQA remain a critical tool in the state's toolbox for reducing greenhouse gas emissions.

Unless the applicant meets AB 987's net zero greenhouse gas requirement and implements real and meaningful local efforts to reduce greenhouse gas and related emissions, we respectfully request **the Governor deny the application.**

The IBEC Project Is Not Net Neutral For Greenhouse Gas Emissions

The IBEC Project's AB 987 application uses a flawed methodology to calculate its net greenhouse gas emissions. Based on well-established agency guidance, an accurate baseline emissions methodology (i.e., the amount of greenhouse gas emissions that a project will eliminate and that are credited against those the project will generate) is limited to accounting for existing on-site emissions. The IBEC Project application

included not only on-site emissions, but also existing emissions from various off-site activities that the application assumes (without foundation) will relocate to the new arena as part of the “baseline” inventory of greenhouse gas emissions. As a result, the application’s baseline for calculating net greenhouse gas emissions is vastly overstated (and, thus, its calculation of net emissions is dramatically understated) for three primary reasons.

First, the baseline takes credit for emissions associated with existing Clippers games that will move from Staples Center in Downtown Los Angeles to the IBEC Project and assumes that no other events will replace those basketball games at the Staples Center. It is exceedingly likely that Staples Center will replace these events with new events. We suspect that because basketball events are scheduled for an entire season, the Clippers leaving Staples Center may actually result in more events at the downtown arena.

Second, the application’s baseline assumes that non-NBA basketball events will relocate to the new Clippers arena from other area-venues like the Forum, Staples Center, and Honda Center in Anaheim and those venues will be dark on those event dates. While events may or may not relocate, it is not accurate to assume the Forum, Staples Center, and Honda Center will let their arenas sit empty for the dates opened up by the vacating events.

Third, the application assumes that no operations will use the Clippers’ existing training facility, stating “the unique design and space allocation of the existing LA Clippers Training Center” makes it too “speculative to assume what use might occupy this facility in the future.” However, in doing so, the application speculates that the training facility will sit empty. This, too, is very unlikely.

California leads the country when it comes to addressing climate change and its effects. AB 987 offers projects a streamlined environmental review, *but only if* the project demonstrates it will be net zero greenhouse gas.¹ Allowing projects to use flawed methodologies to calculate its mitigation requirements runs counter not only to AB 987 but also to California’s broader strategy to combat climate change.

The IBEC Project’s methodology, if approved through certification of the IBEC Project’s application, will materially impair California’s ability to address greenhouse gas emissions through CEQA. This would be a disastrous shift in achieving compliance with California’s greenhouse gas reduction goals.

The IBEC Project’s Local Reductions Do Not Meet AB 987’s Requirements

AB 987 requires that at least half of the measures to offset greenhouse gas emissions be based in the local community “to maximize public health, environmental and employment benefits.” Climate Resolve recognizes the importance of reducing greenhouse gas emissions on a local level. An important part of our mission is to support such reductions.

The IBEC Project does not meet AB 987’s 50% local reduction requirement and does not show that all of the greenhouse gas offsets cannot be achieved through local actions.

The application states that 57% of the project’s offsets are from local measures. However, this is incorrect because the 57% figure is based on faulty methodology. When calculated correctly, local measures, assuming they are effective, will offset approximately 14% of the project’s greenhouse gas emissions.

In addition, the local reductions are largely predicated on a Transportation Demand Management program to reduce vehicle trips that is unlikely to achieve the forecasted reduction in trips (and thus not likely to achieve the related level of greenhouse gas reduction). Imagine the viability of achieving increased transit usage in a community that has little transit, as compared to downtown Los Angeles where Staples Center is located. The

¹ Public Resources Code § 21168.8 subdivision (b)(3) requires that the project not cause a net increase in GHGs.

Staples Center resides at a hub of numerous heavily-trafficked rail lines while the proposed IBEC Project site is over one mile away from both the lightly trafficked Green Line and yet-to-be-opened Crenshaw Line. It is fantastical to suggest that people will arrive via public transit in greater numbers at the IBEC Project than the centrally located, walkable Staples Center. The TDM program is not realistic, implementable, or achievable.

Inglewood's residents should not be burdened with the weight of hundreds of thousands of metric tons of greenhouse gases and associated toxic air contaminants. AB 987 and Governor Brown in his signing statement for AB 987 recognized that AB 987's local measures are not only important to reduce local greenhouse gas emissions, but also to reduce the highly correlated pollutant emissions that accompany greenhouse gases.

The IBEC Project Disproportionately Impacts A Low-Income Community

Governor Newsom, in his State of the State Address delivered on February 12, said that California must "map out longer-term strategies [for California's energy and climate change future]...to ensure that the cost of climate change doesn't fall on those least able to afford it."

Climate Resolve agrees. The importance of local mitigation of greenhouse gas emissions takes on even more significance in low-income communities, like the Inglewood community around the IBEC Project.² Climate Resolve's mission is focused on creating climate solutions that benefit all, especially in communities that are already the most affected by climate change and least able to defend against its impacts. These impacts include not only the direct effects of climate change but the correlated effect of an increase in other pollutants as well.

It is well documented that local greenhouse gas reduction measures have the added benefit of resulting in concurrent reductions in other criteria and toxic air contaminants.³ The IBEC Project has greatly underestimated its greenhouse gas emissions and, therefore, underestimates the measures it must take to offset those emissions locally. These underestimations will lead to an increase in pollutants emitted into the local community.

In addition to the underestimation of greenhouse gas emissions, the application also fails to account adequately for the increase in vehicles on the road that may be associated with the arena's operations. Increases in heavy-duty trucks for example may lead to an increase in diesel particulate matter emissions into the local community. California identifies DPM as a known carcinogen. Exposure to DPM is particularly hazardous to children whose lungs are still developing and the elderly who may have other serious health problems.

AB 987 mandates local mitigation measures that have the co-benefit of reducing other pollutant emissions in neighboring communities. Instead, the application relies on purchased offsets located elsewhere that will do nothing to address the negative health effects the IBEC Project will have on local residents.

Conclusion

Climate Resolve is committed to supporting and facilitating lasting global change that starts with a local approach. Economic investment that provides permanent high paying and highly skilled jobs is needed across Southern California.

²The median household income in the impacted community is around \$30,000. See <http://www.latimes.com/sports/sportsnow/la-sp-inglewood-arena-vote-20170814-story.html>

³ See CARB, Final Scoping Plan Update, 2017, p. 14, available at https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

AB 987 envisions this investment *and* greenhouse gas emission reductions and improvement of the local environment. The IBEC Project proposes investment but at a substantial cost and with significant health impacts on the local community and environment.

Climate Resolve looks forward to the Governor ensuring that AB 987's goals and mandates are fully implemented and respectfully requests that the Governor deny IBEC Project's application for certification under AB 987.

To be clear, Climate Resolve is not existentially opposed to the IBEC Project, nor other development that invokes AB 987 and properly characterizes and reduces greenhouse gas emissions. For example, Climate Resolve recently supported the approach to greenhouse gas emissions taken by the Gehry-designed mixed-use complex located at 8150 Sunset Blvd.

However, we are adamantly opposed to the abuse of AB 987 by playing fast-and-loose with greenhouse gas accounting. Simply, the Inglewood Basketball Project fails to satisfy the statute's key requirements, so we respectfully request that the Project not be certified.

Thank you for your consideration of these important issues. We would be happy to discuss them with you at any time.

Sincerely,



Jonathan Parfrey
Executive Director

cc: Mary D. Nichols, Chair, ARB
Richard Corey, Executive Officer, ARB
Steven Cliff, Deputy Executive Officer, ARB