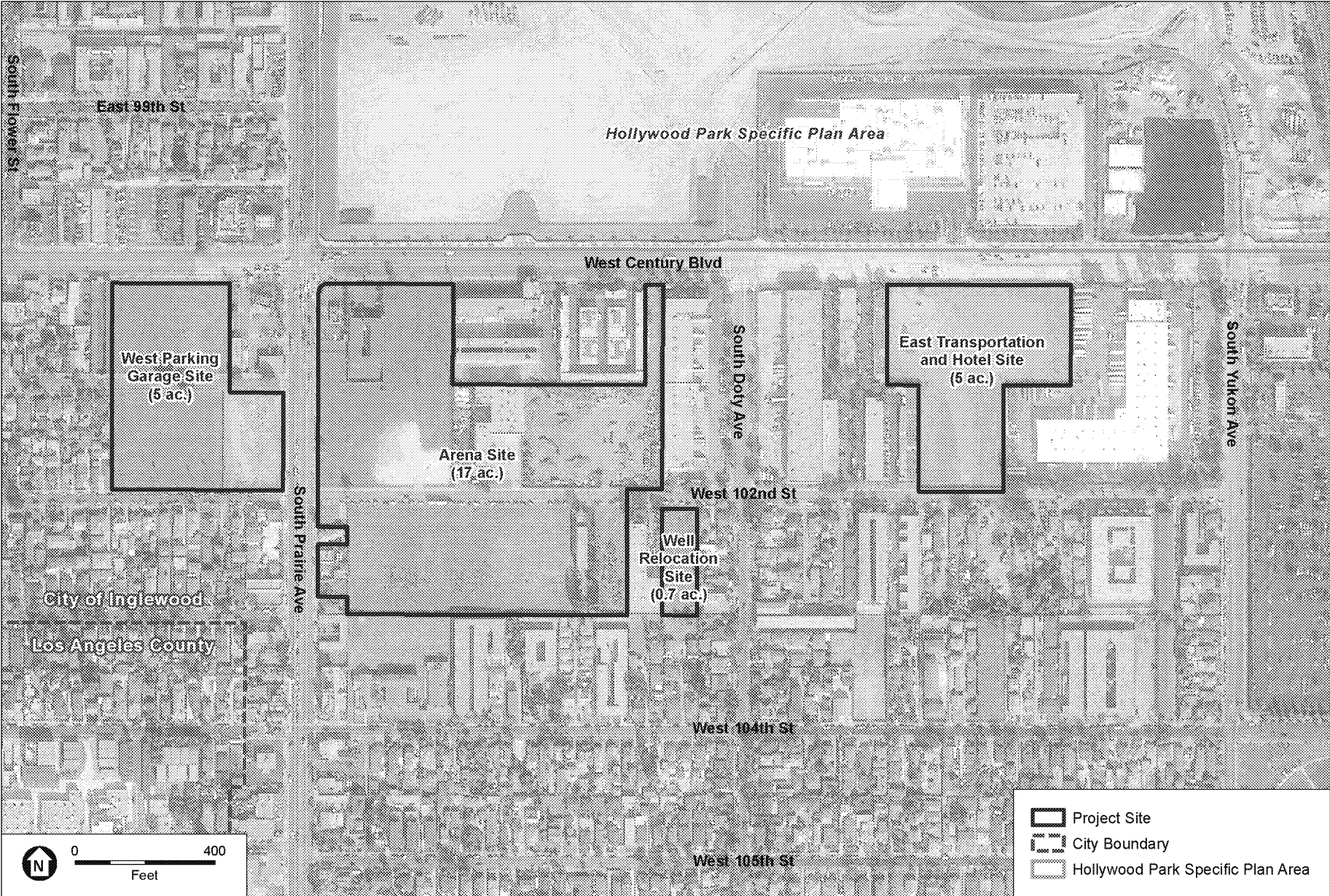


City Council Staff Report

Attachment 1:

Project Site Aerial



Hollywood Park Specific Plan Area

East 99th St

West Century Blvd

West Parking  
Garage Site  
(5 ac.)

East Transportation  
and Hotel Site  
(5 ac.)

Arena Site  
(17 ac.)

Well  
Relocation  
Site  
(0.7 ac.)

West 102nd St

City of Inglewood

Los Angeles County

West 104th St

West 105th St

- Project Site
- City Boundary
- Hollywood Park Specific Plan Area



City Council Staff Report

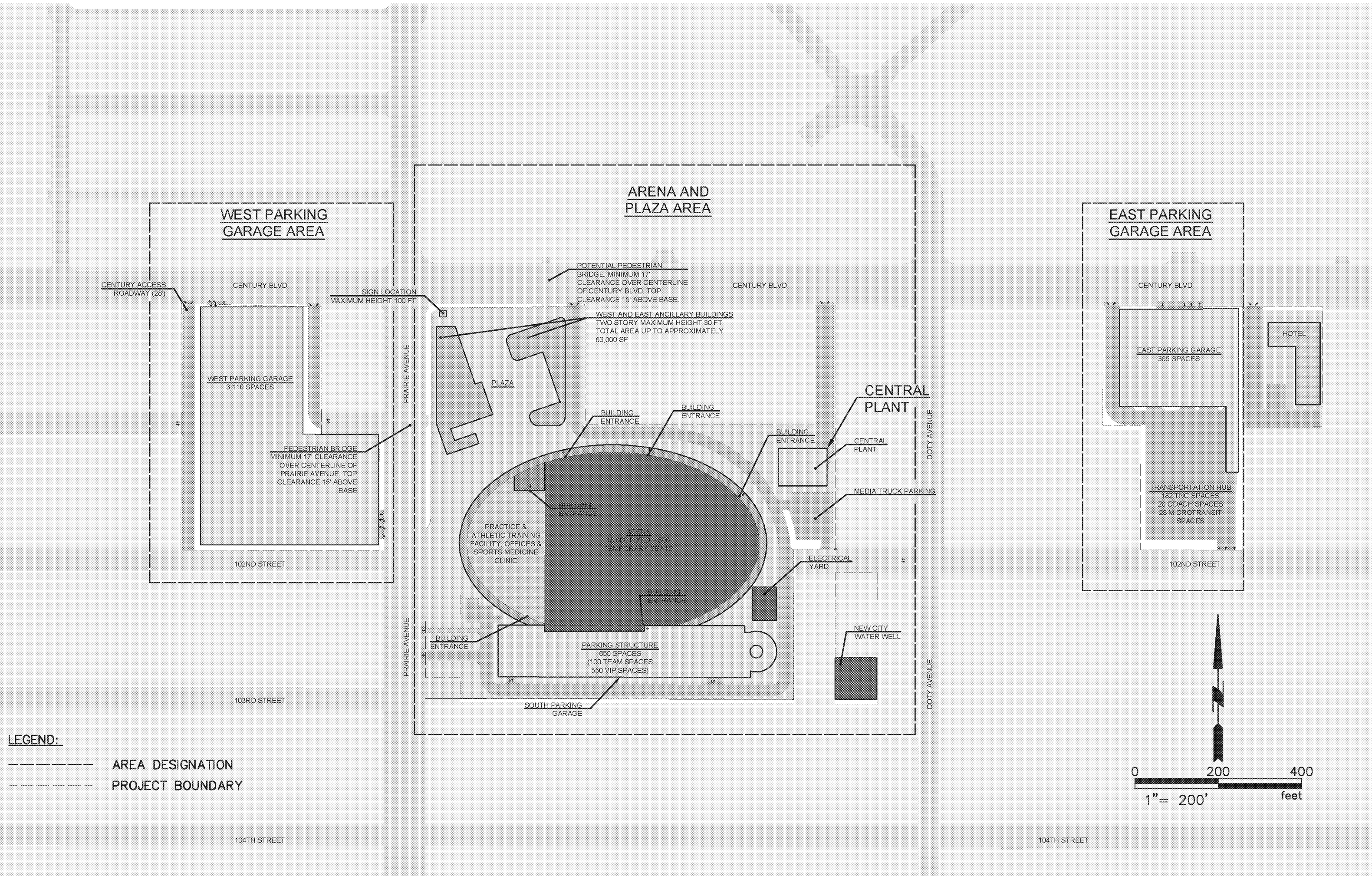
Attachment 2:

Basic Site Plan Drawings

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER

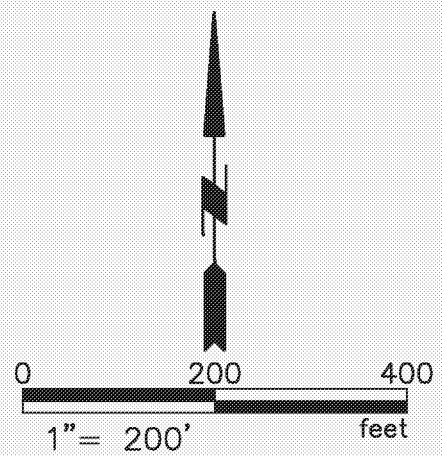
BASIC SITE PLAN DRAWINGS

JUNE 04, 2020



**LEGEND:**

- - - - - AREA DESIGNATION
- - - - - PROJECT BOUNDARY

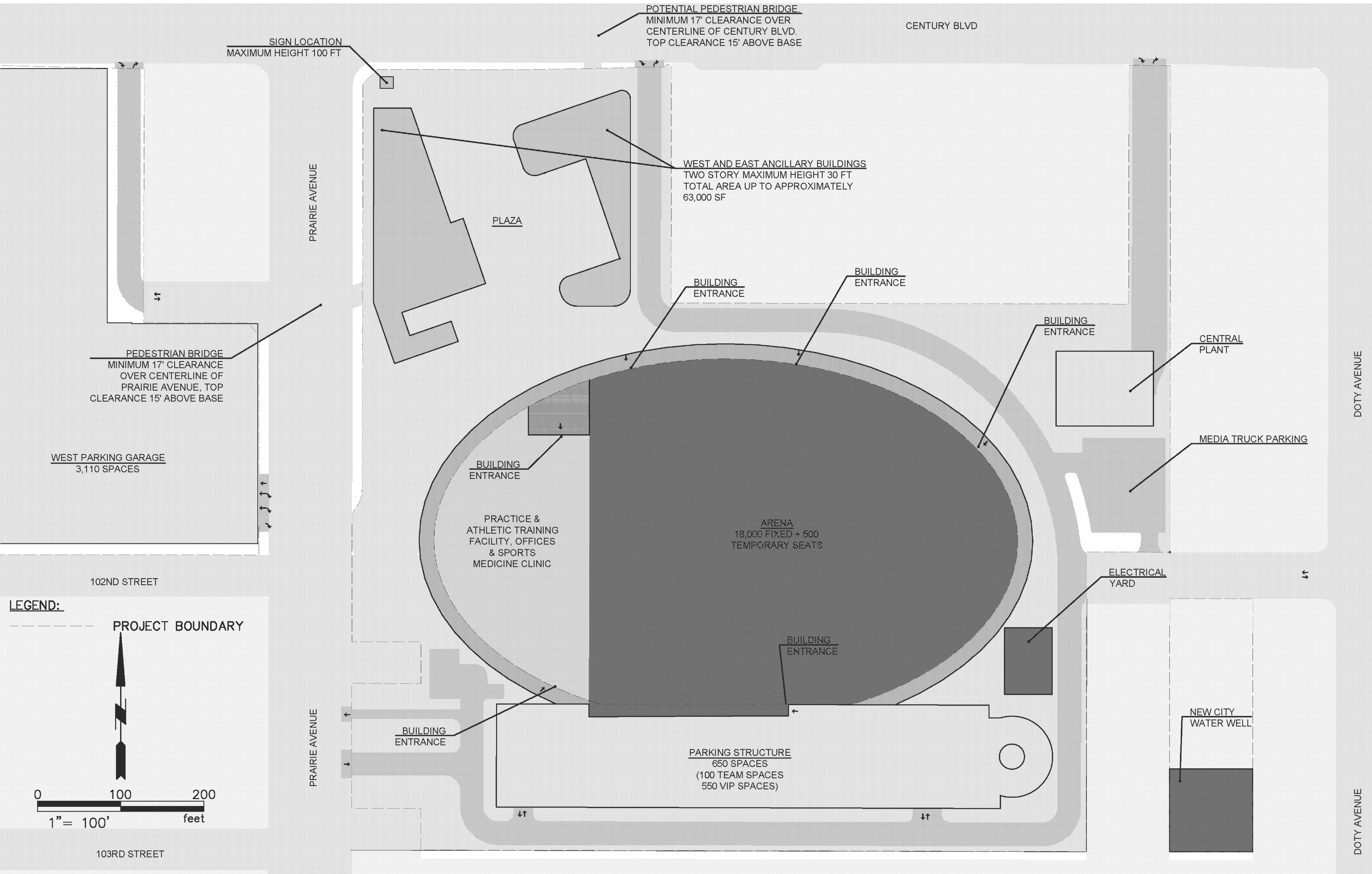


INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER

BASIC SITE PLAN DRAWINGS

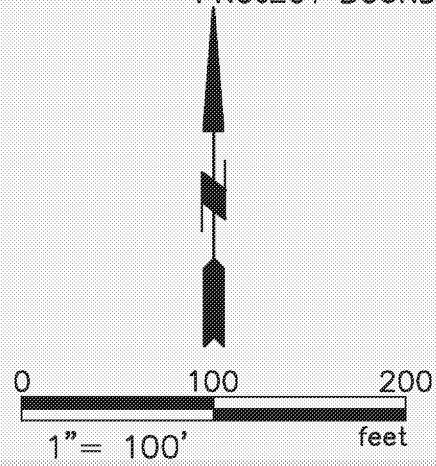
ARENA AND PLAZA AREA

JUNE 04, 2020



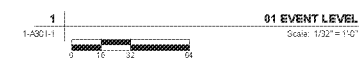
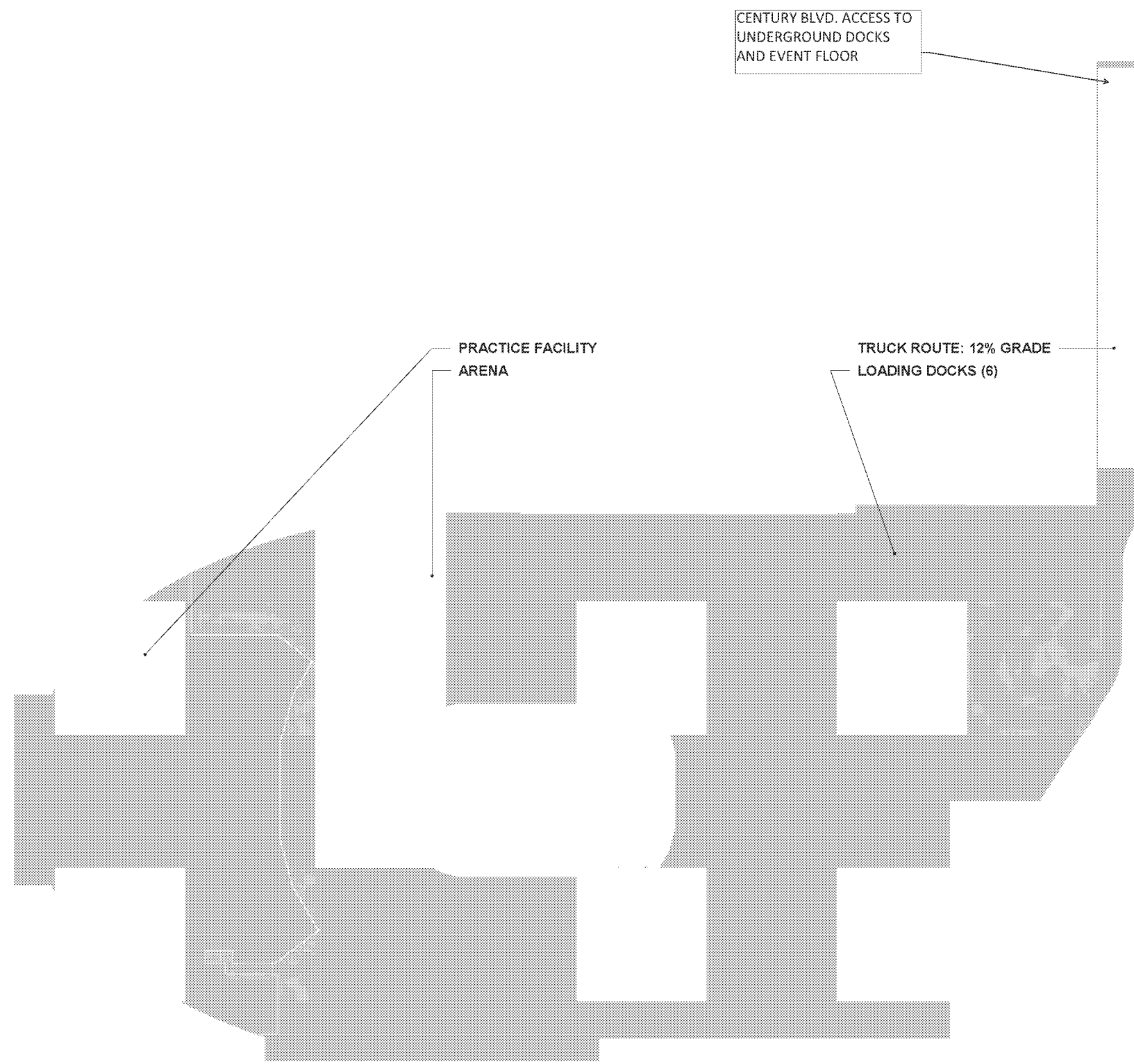
**LEGEND:**

PROJECT BOUNDARY



103RD STREET

ARCHES 148  
 PROJECT MANAGEMENT: PROJECT MANAGER: CHUCK CHAIKIN, PROJECT MANAGER: CHUCK CHAIKIN, PROJECT MANAGER: CHUCK CHAIKIN  
 DESIGN: DESIGNER: CHUCK CHAIKIN, DESIGNER: CHUCK CHAIKIN, DESIGNER: CHUCK CHAIKIN  
 FILE NAME: 01 EVENT LEVEL OVERALL FLOOR PLAN



**PROJECT**  
 INGLEWOOD BASKETBALL &  
 ENTERTAINMENT CENTER



**MURPHY'S BOWL, LLC**  
 OWNER  
**WILSON MEANY**  
 DEVELOPER'S MANAGING AGENT  
**LEGENDS**  
 OWNER'S REPRESENTATIVE

**AECOM**  
 ARCHITECTURE / ELECTRICAL /  
 PLUMBING / FAÇADE DESIGN /  
 HIGH PERFORMANCE BUILDING /  
 ENHANCED COMMISSIONING /  
 GEOTECH / TRANSPORTATION

**WALTER P. MOORE**  
 STRUCTURAL

**HENDERSON ENGINEERS**  
 MECHANICAL / FIRE PROTECTION

**D & D ENGINEERING, INC.**  
 CIVIL WET UTILITIES

**ANDERSON BARKER ARCHITECTS**  
 ARCHITECTURE

**HOOD DESIGN STUDIO**  
 URBAN PLANNING /  
 LANDSCAPE DESIGN

**WRIGHTSON, JOHNSON, HADDON  
 & WILLIAMS, INC.**  
 ACOUSTICS / AV / BROADCAST /  
 DATA / DAS / SECURITY / SOUND /  
 TELE / WIFI

**B. J. PALMER & ASSOCIATES, INC.**  
 CIVIL DRY UTILITIES

**DOWNSTREAM**  
 ENVIRONMENTAL GRAPHICS

**FP&C CONSULTANTS, INC.**  
 CODES / LIFE SAFETY

**HORTON LEES BROGDEN**  
 SPECIALTY LIGHTING

**LEE HERZOG FAÇADE ACCESS  
 CONSULTING**  
 FAÇADE ACCESS

**LERCH BATES**  
 VERTICAL TRANSPORTATION

**S2O CONSULTANTS**  
 FOOD SERVICE

**WALKER CONSULTANTS**  
 PARKING DESIGN

**CITY DESIGN STUDIO**  
 ARCHITECTURE

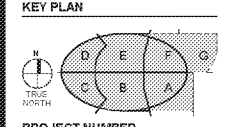
**REGISTRATION**  
 These Design Development drawings represent the  
 current status of the design process and have been  
 issued for Construction Commission. Owner review  
 and approval, and for updating estimates or probable  
 construction cost. They do not describe the complete  
 and final design or scope of work required for  
 construction of the project, and it may, under any  
 circumstances, intended to be used by the CM or  
 other Contractor, or any other person for construction,  
 for preparation of shop drawings or other submittals or  
 for bidding or awarding subcontracts.

**DISCUSSION DRAFT**

**50% DESIGN  
 DEVELOPMENT**

**ISSUE / REVISION**

NO.	DATE	DESCRIPTION



**PROJECT NUMBER**  
 0548023

**SHEET TITLE**  
 EVENT LEVEL OVERALL FLOOR  
 PLAN  
**SHEET NUMBER**

**1-A101**  
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MURPHY'S BOWL, LLC  
OWNER

WILSON MEANY  
DEVELOPER'S MANAGING AGENT

LEGENDS  
OWNER'S REPRESENTATIVE

AECOM  
ARCHITECTURE / ELECTRICAL /  
PLUMBING / FAÇADE DESIGN /  
HIGH PERFORMANCE BUILDING /  
ENHANCED COMMISSIONING /  
GEOTECH / TRANSPORTATION

WALTER P. MOORE  
STRUCTURAL

HENDERSON ENGINEERS  
MECHANICAL / FIRE PROTECTION

D & D ENGINEERING, INC.  
CIVIL WET UTILITIES

ANDERSON BARKER ARCHITECTS  
ARCHITECTURE

HOOD DESIGN STUDIO  
URBAN PLANNING /  
LANDSCAPE DESIGN

WRIGHTSON, JOHNSON, HADDON  
& WILLIAMS, INC.  
ACOUSTICS / AV / BROADCAST /  
DATA / DAS / SECURITY / SOUND /  
TELE / WIFI

B. J. PALMER & ASSOCIATES, INC.  
CIVIL DRY UTILITIES

DOWNSTREAM  
ENVIRONMENTAL GRAPHICS

FP&C CONSULTANTS, INC.  
CODES / LIFE SAFETY

HORTON LEES BROGDEN  
SPECIALTY LIGHTING

LEE HERZOG FAÇADE ACCESS  
CONSULTING  
FAÇADE ACCESS

LERCH BATES  
VERTICAL TRANSPORTATION

S2O CONSULTANTS  
FOOD SERVICE

WALKER CONSULTANTS  
PARKING DESIGN

CITY DESIGN STUDIO  
ARCHITECTURE

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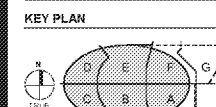
**DISCUSSION DRAFT**

**50% DESIGN DEVELOPMENT**

**ISSUE / REVISION**

NO.	DATE	DESCRIPTION

**KEY PLAN**



**PROJECT NUMBER**

55549123

**SHEET TITLE**

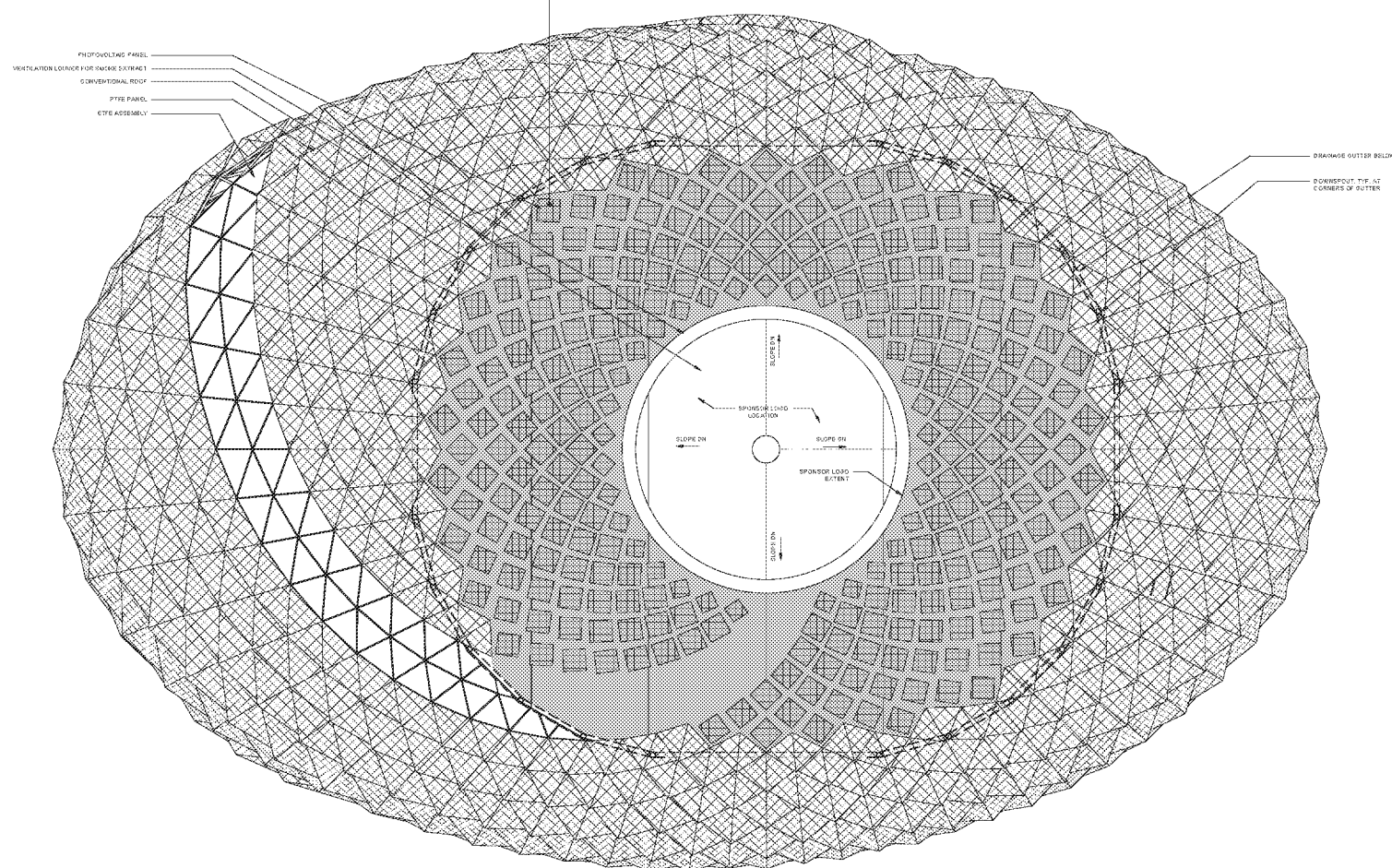
ROOF LEVEL OVERALL PLAN

**SHEET NUMBER**

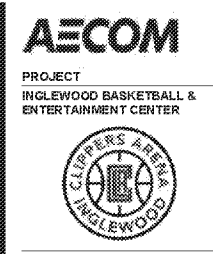
1-A109

© 2019 AECOM TECHNICAL SERVICES, INC.

PHOTOVOLTAIC PANEL - TYP.



Project Management: [Name], Designer: [Name], Approver: [Name]  
 Date: [Date], Project: [Name], Client: [Name], Location: [Name]  
 File Path: [Path]



**MURPHY'S BOWL, LLC**  
OWNER  
**WILSON MEANY**  
DEVELOPER'S MANAGING AGENT  
**LEGENDS**  
OWNER'S REPRESENTATIVE

**AECOM**  
ARCHITECTURE / ELECTRICAL / PLUMBING / FACADE DESIGN / HIGH PERFORMANCE BUILDING / ENHANCED COMMISSIONING / GEOTECH / TRANSPORTATION

**WALTER P. MOORE**  
STRUCTURAL  
**HENDERSON ENGINEERS**  
MECHANICAL / FIRE PROTECTION

**D & D ENGINEERING, INC.**  
CIVIL WET UTILITIES  
**ANDERSON BARKER ARCHITECTS**  
ARCHITECTURE

**HOOD DESIGN STUDIO**  
URBAN PLANNING / LANDSCAPE DESIGN

**WRIGHTSON, JOHNSON, HADDON & WILLIAMS, INC.**  
ACOUSTICS / AV / BROADCAST / DATA / DAS / SECURITY / SOUND / TELE / WIFI

**B. J. PALMER & ASSOCIATES, INC.**  
CIVIL DRY UTILITIES

**DOWNSTREAM**  
ENVIRONMENTAL GRAPHICS

**FP&C CONSULTANTS, INC.**  
CODES / LIFE SAFETY

**HORTON LEES BROGDEN**  
SPECIALTY LIGHTING

**LEE HERZOG FACADE ACCESS CONSULTING**  
FACADE ACCESS

**LERCH BATES**  
VERTICAL TRANSPORTATION

**S2O CONSULTANTS**  
FOOD SERVICE  
**WALKER CONSULTANTS**  
PARKING DESIGN  
**CITY DESIGN STUDIO**  
ARCHITECTURE

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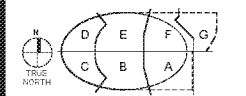
**DISCUSSION DRAFT**

**50% DESIGN DEVELOPMENT**

**ISSUE / REVISION**

NO	DATE	DESCRIPTION

**KEY PLAN**

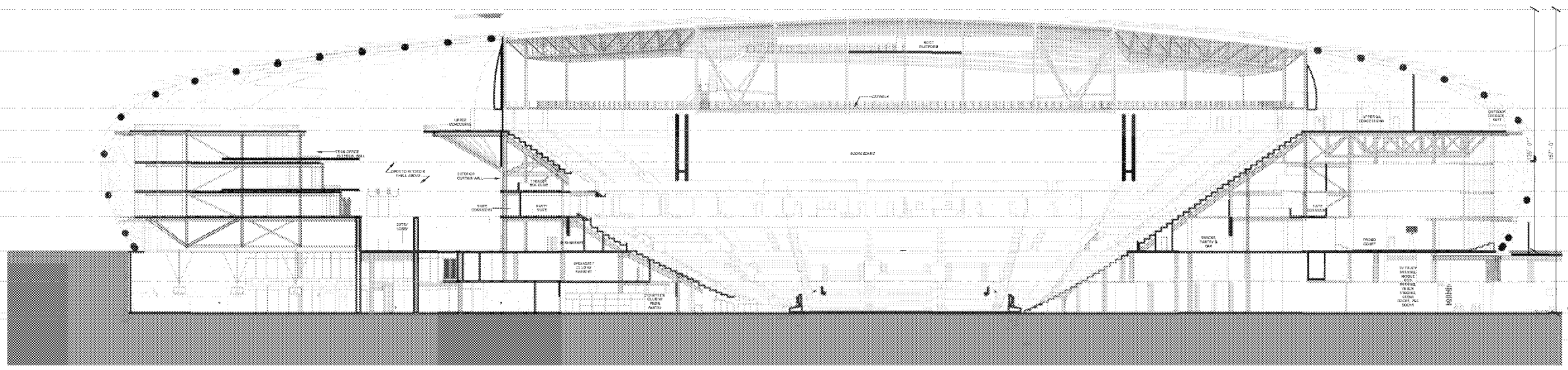


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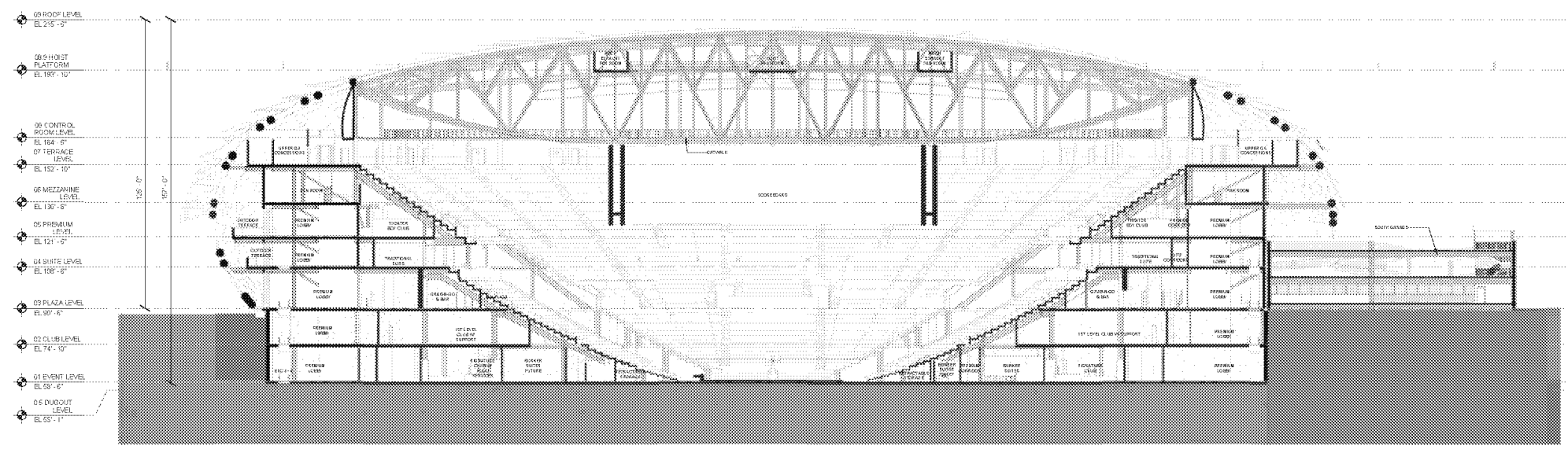
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**SHEET NUMBER**

**1-A301-1**



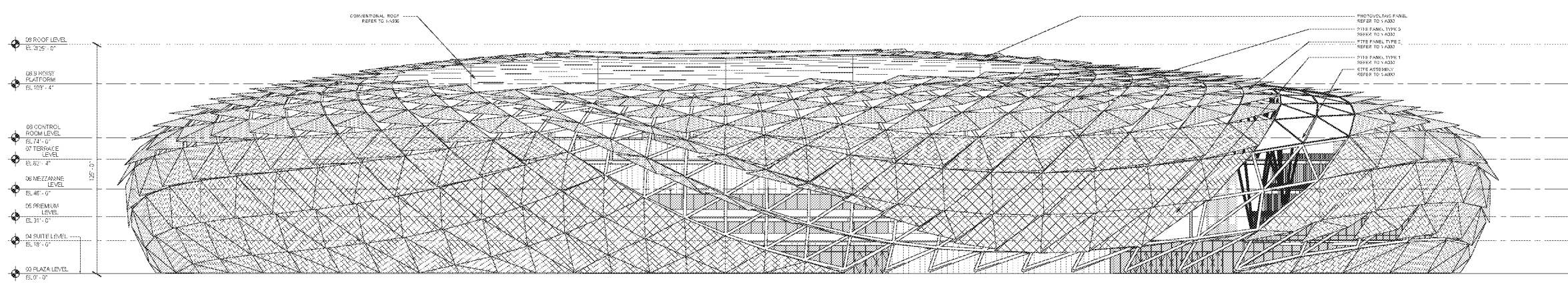
**D1** LONGITUDINAL SECTION  
Scale: 1/4" = 1'-0"



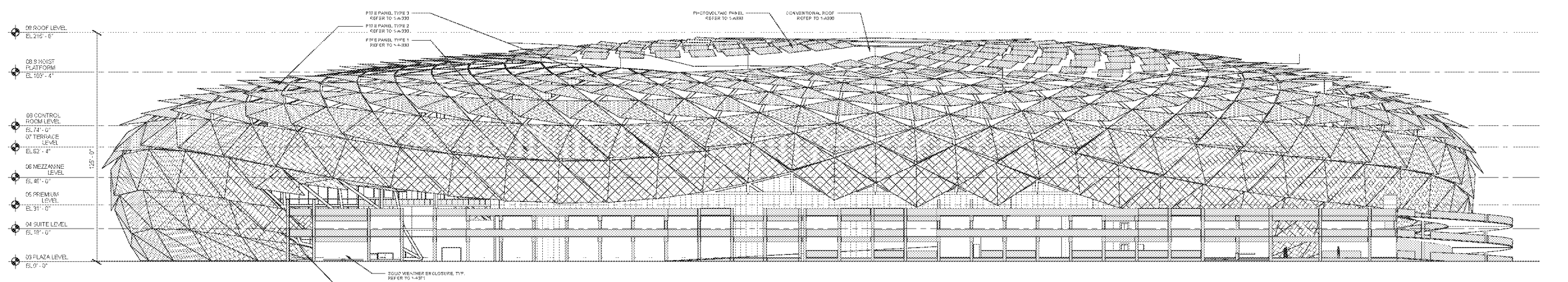
**A1** TRANSVERSE SECTION  
Scale: 1" = 20'-0"

Project Manager: [Name], Designer: [Name], Checker: [Name], Approver: [Name], Date: [Date], File Name: [File Name]

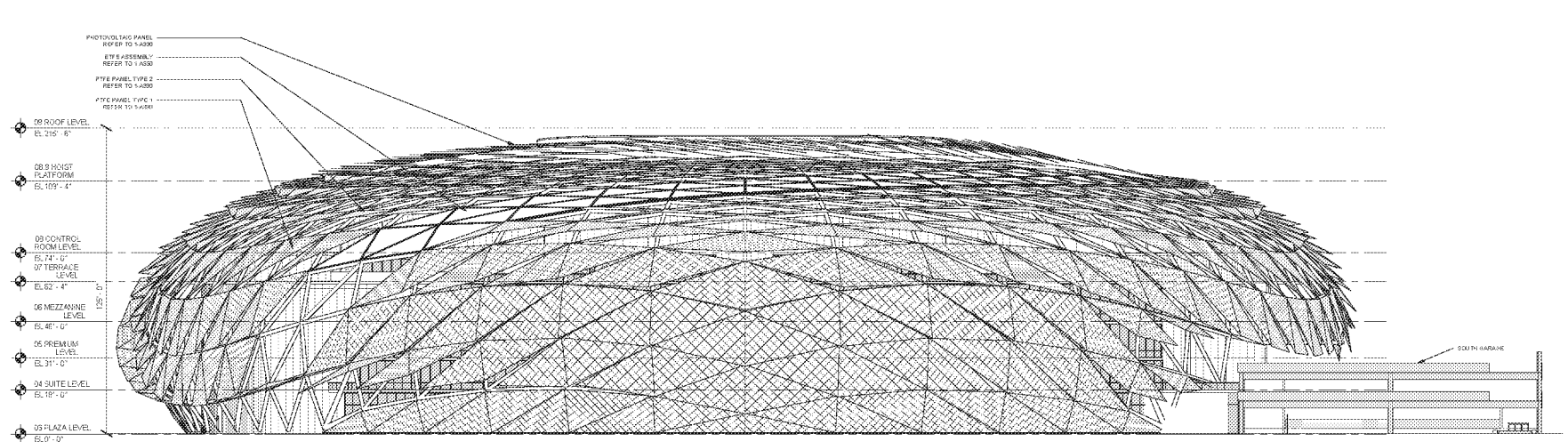
Project Management: [Blank]  
 Design: [Blank]  
 Approval: [Blank]  
 Engineer: [Blank]  
 Project Name: [Blank]



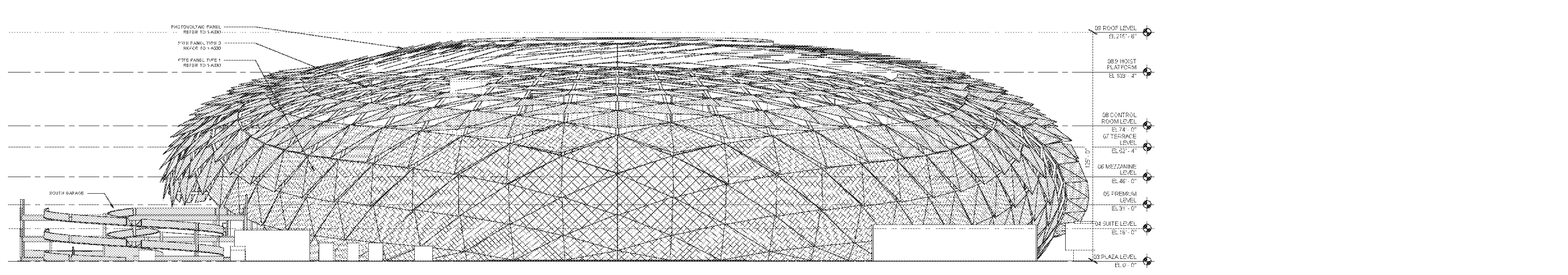
**E7**  
NORTH ELEVATION (GRID SHELL)  
Scale: 3/32" = 1'-0"



**D7**  
SOUTH ELEVATION (WITH GARAGE)  
Scale: 3/32" = 1'-0"



**B7**  
WEST ELEVATION (GRID SHELL)  
Scale: 3/32" = 1'-0"



**A7**  
EAST ELEVATION (GRID SHELL)  
Scale: 3/32" = 1'-0"



**MURPHY'S BOWL, LLC**  
OWNER  
**WILSON MEANY**  
DEVELOPER'S MANAGING AGENT  
**LEGENDS**  
OWNER'S REPRESENTATIVE

- AECOM**  
ARCHITECTURE / ELECTRICAL /  
PLUMBING / FAÇADE DESIGN /  
HIGH PERFORMANCE BUILDING /  
ENHANCED COMMISSIONING /  
GEOTECH / TRANSPORTATION
- WALTER P. MOORE**  
STRUCTURAL
- HENDERSON ENGINEERS**  
MECHANICAL / FIRE PROTECTION
- D & D ENGINEERING, INC.**  
CIVIL WET UTILITIES
- ANDERSON BARKER ARCHITECTS**  
ARCHITECTURE
- HOOD DESIGN STUDIO**  
URBAN PLANNING /  
LANDSCAPE DESIGN
- WRIGHTSON, JOHNSON, HADDON  
& WILLIAMS, INC.**  
ACOUSTICS / AV / BROADCAST /  
DATA / DAS / SECURITY / SOUND /  
TELE / WIFI
- B.J. PALMER & ASSOCIATES, INC.**  
CIVIL DRY UTILITIES
- DOWNSTREAM**  
ENVIRONMENTAL GRAPHICS
- FP&C CONSULTANTS, INC.**  
CODES / LIFE SAFETY
- HORTON LEES BROGDEN**  
SPECIALTY LIGHTING
- LEE HERZOG FAÇADE ACCESS  
CONSULTING**  
FAÇADE ACCESS
- LERCH BATES**  
VERTICAL TRANSPORTATION
- S2O CONSULTANTS**  
FOOD SERVICE
- WALKER CONSULTANTS**  
PARKING DESIGN
- CITY DESIGN STUDIO**  
ARCHITECTURE

**REGISTRATION**  
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and approval, and for updating submittals at preconstruction.  
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and final design or scope of work required for  
construction of the project and in no case, under any  
circumstances, intended to be used by the CM or  
other Contractor or any other person for construction  
or preparation of shop drawings or other submittals or  
for bidding or awarding subcontracts.

**DISCUSSION DRAFT**

**50% DESIGN  
DEVELOPMENT**

**ISSUE / REVISION**


**KEY PLAN**

**PROJECT NUMBER**  
2019-0102

**SHEET TITLE**  
ELEVATIONS

**SHEET NUMBER**  
1-A311

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER

BASIC SITE PLAN DRAWINGS

CENTRAL PLANT

JUNE 04, 2020



**REGISTRATION**

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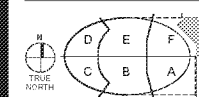
**DISCUSSION DRAFT**

**50% DESIGN DEVELOPMENT**

**ISSUE / REVISION**

NO.	DATE	DESCRIPTION

**KEY PLAN**



**PROJECT NUMBER**

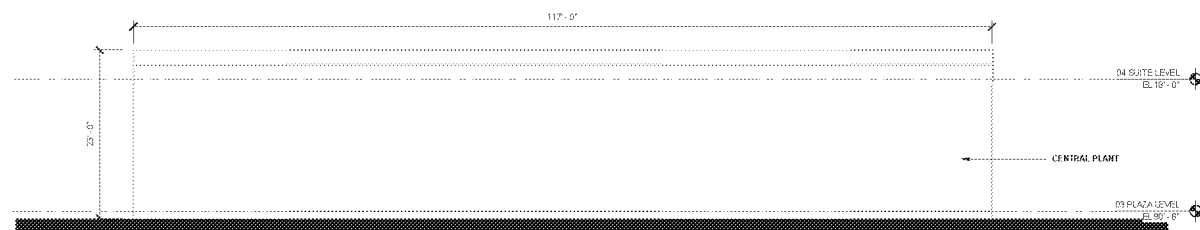
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**SHEET TITLE**

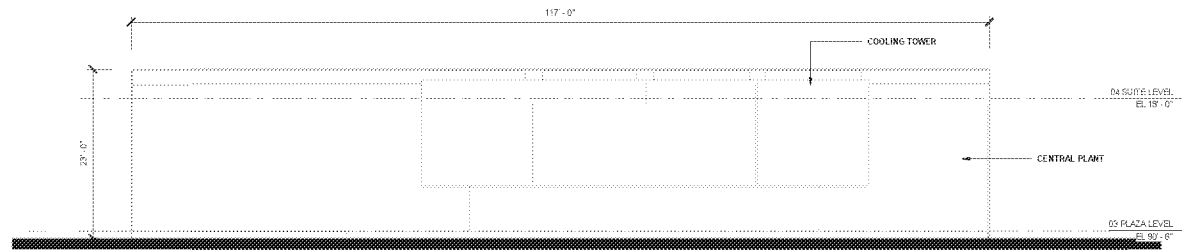
CENTRAL PLANT PLAN

**SHEET NUMBER**

**BD - A110**



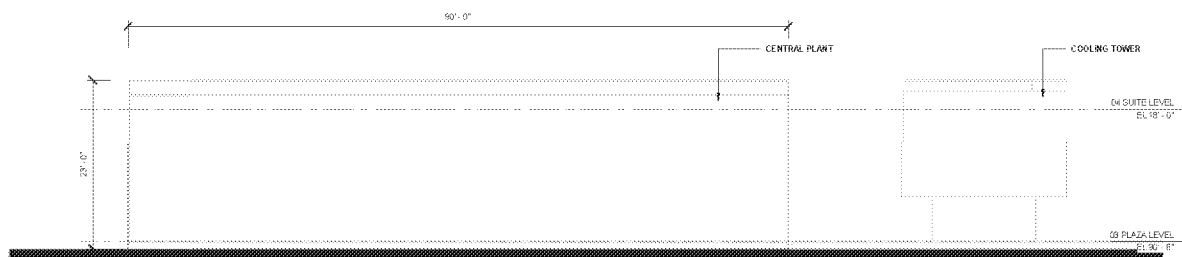
F4 | **CENTRAL PLANT SOUTH ELEVATION**  
Scale: 1/8" = 1'-0"



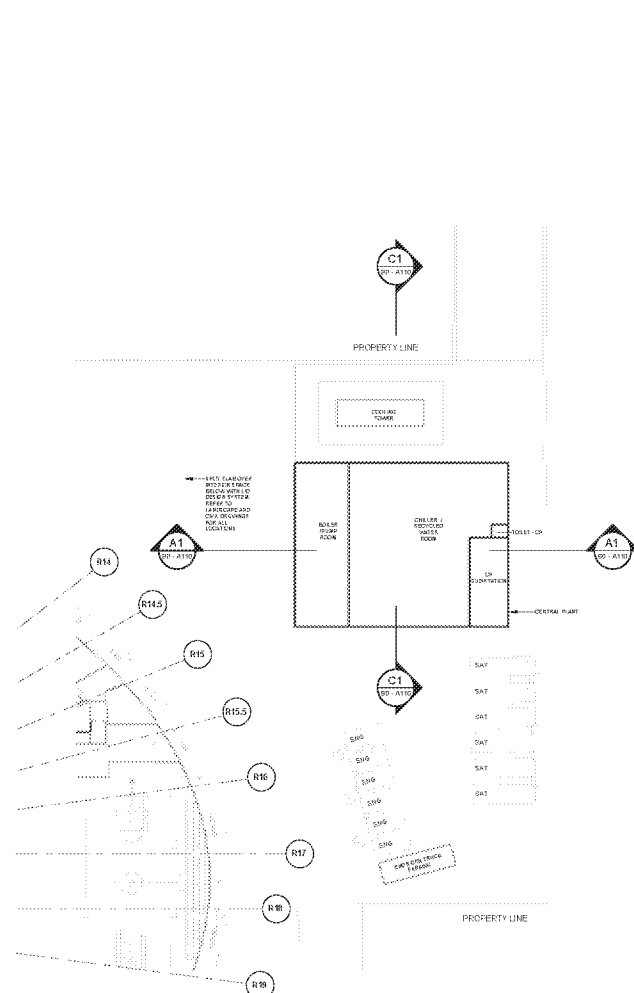
F1 | **CENTRAL PLANT NORTH ELEVATION**  
Scale: 1/8" = 1'-0"



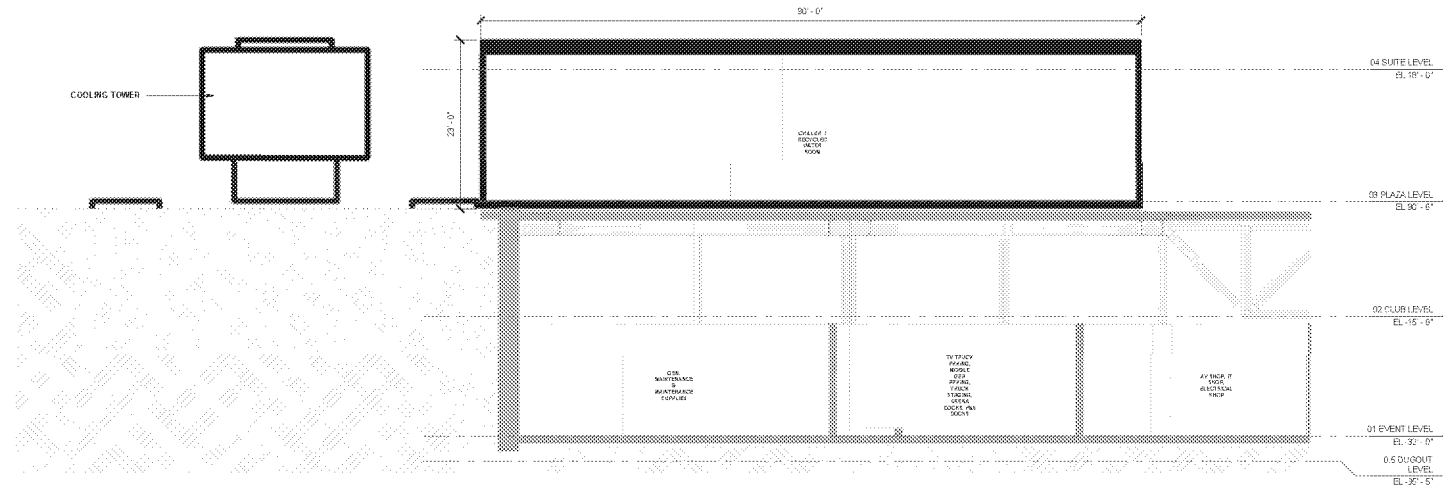
E4 | **BD - CENTRAL PLANT WEST ELEVATION**  
Scale: 1/8" = 1'-0"



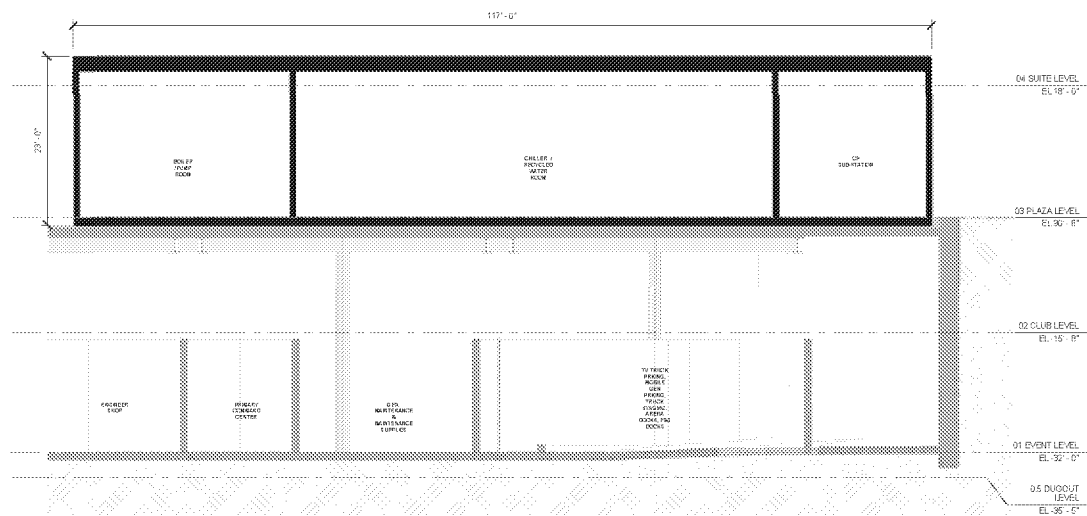
E1 | **BD - CENTRAL PLANT EAST ELEVATION**  
Scale: 1/8" = 1'-0"



A5 | **CENTRAL PLANT PLAN**  
Scale: 1/8" = 1'-0"



C1 | **CENTRAL PLANT TRANSVERSE SECTION**  
Scale: 1/8" = 1'-0"



A1 | **CENTRAL PLANT LONGITUDINAL SECTION**  
Scale: 1/8" = 1'-0"

Project Management: [Name], Designer: [Name], Checker: [Name], Date: [Date]

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER

BASIC SITE PLAN DRAWINGS

WEST PARKING GARAGE

JUNE 04, 2020



MURPHY'S BOWL, LLC  
OWNER  
WILSON MEANY  
DEVELOPER'S MANAGING AGENT  
LEGENDS  
OWNER'S REPRESENTATIVE

AECOM  
ARCHITECTURE / ELECTRICAL / PLUMBING / FAÇADE DESIGN / HIGH PERFORMANCE BUILDING / ENHANCED COMMISSIONING / GEOTECH / TRANSPORTATION

WALTER P. MOORE  
STRUCTURAL

HENDERSON ENGINEERS  
MECHANICAL / FIRE PROTECTION

D & D ENGINEERING, INC.  
CIVIL WET UTILITIES

ANDERSON BARKER ARCHITECTS  
ARCHITECTURE

HOOD DESIGN STUDIO  
URBAN PLANNING / LANDSCAPE DESIGN

WRIGHTSON, JOHNSON, HADDON & WILLIAMS, INC.  
ACOUSTICS / AV / BROADCAST / DATA / DAS / SECURITY / SOUND / TELE / WIFI

B. J. PALMER & ASSOCIATES, INC.  
CIVIL DRY UTILITIES

DOWNSTREAM  
ENVIRONMENTAL GRAPHICS

FP&C CONSULTANTS, INC.  
CODES / LIFE SAFETY

HORTON LEES BROGDEN  
SPECIALTY LIGHTING

LEE HERZOG FAÇADE ACCESS CONSULTING  
FAÇADE ACCESS

LERCH BATES  
VERTICAL TRANSPORTATION

S2O CONSULTANTS  
FOOD SERVICE

WALKER CONSULTANTS  
PARKING DESIGN

CITY DESIGN STUDIO  
ARCHITECTURE

REGISTRATION

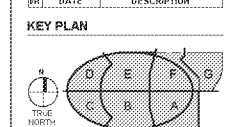
REGISTRATION  
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DISCUSSION DRAFT

60% DESIGN DEVELOPMENT

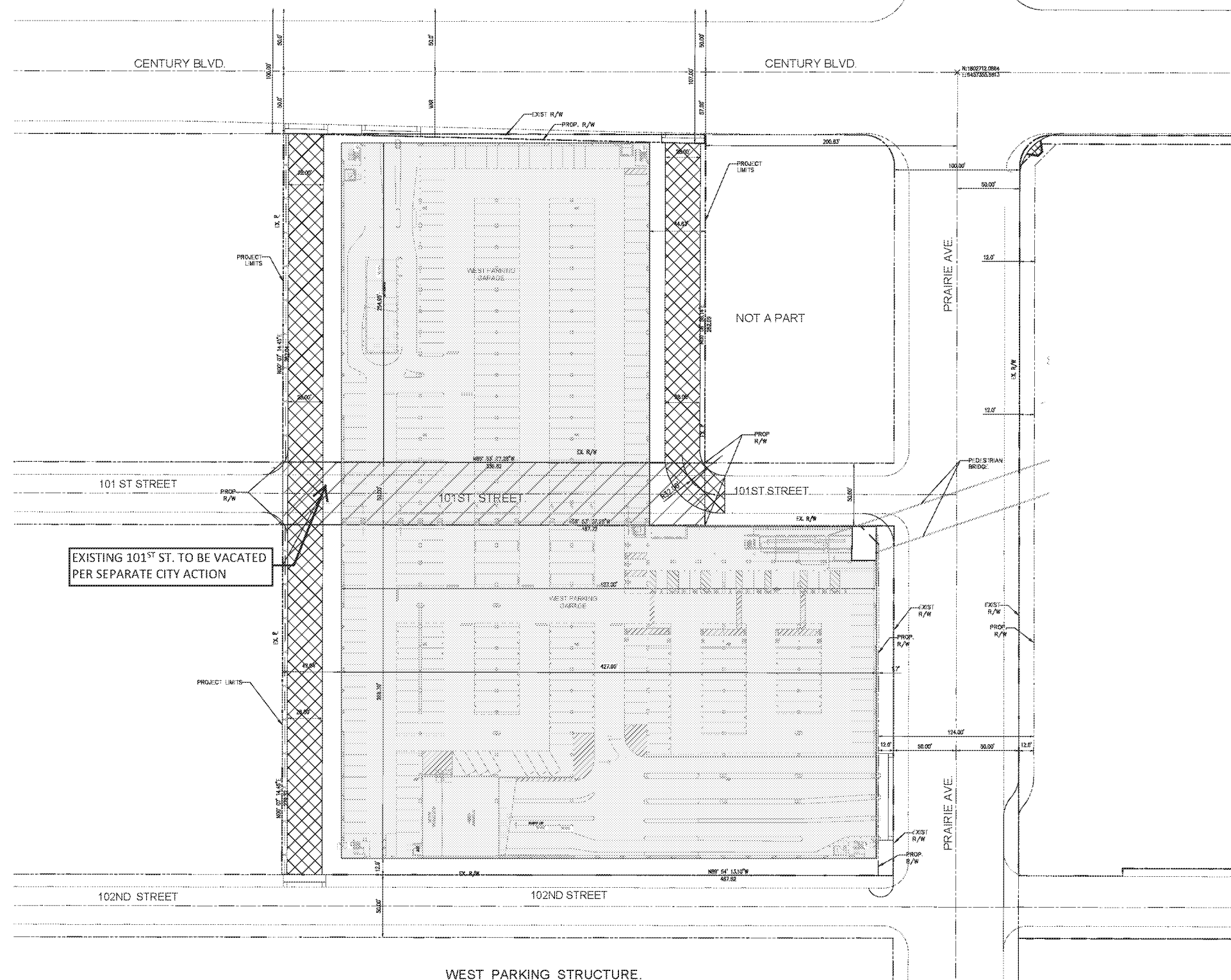
ISSUE / REVISION

NO.	DATE	DESCRIPTION



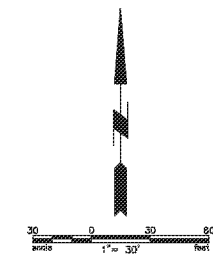
PROJECT NUMBER

SHEET TITLE  
HORIZONTAL CONTROL PLAN  
WEST PARKING STRUCTURE  
SHEET NUMBER

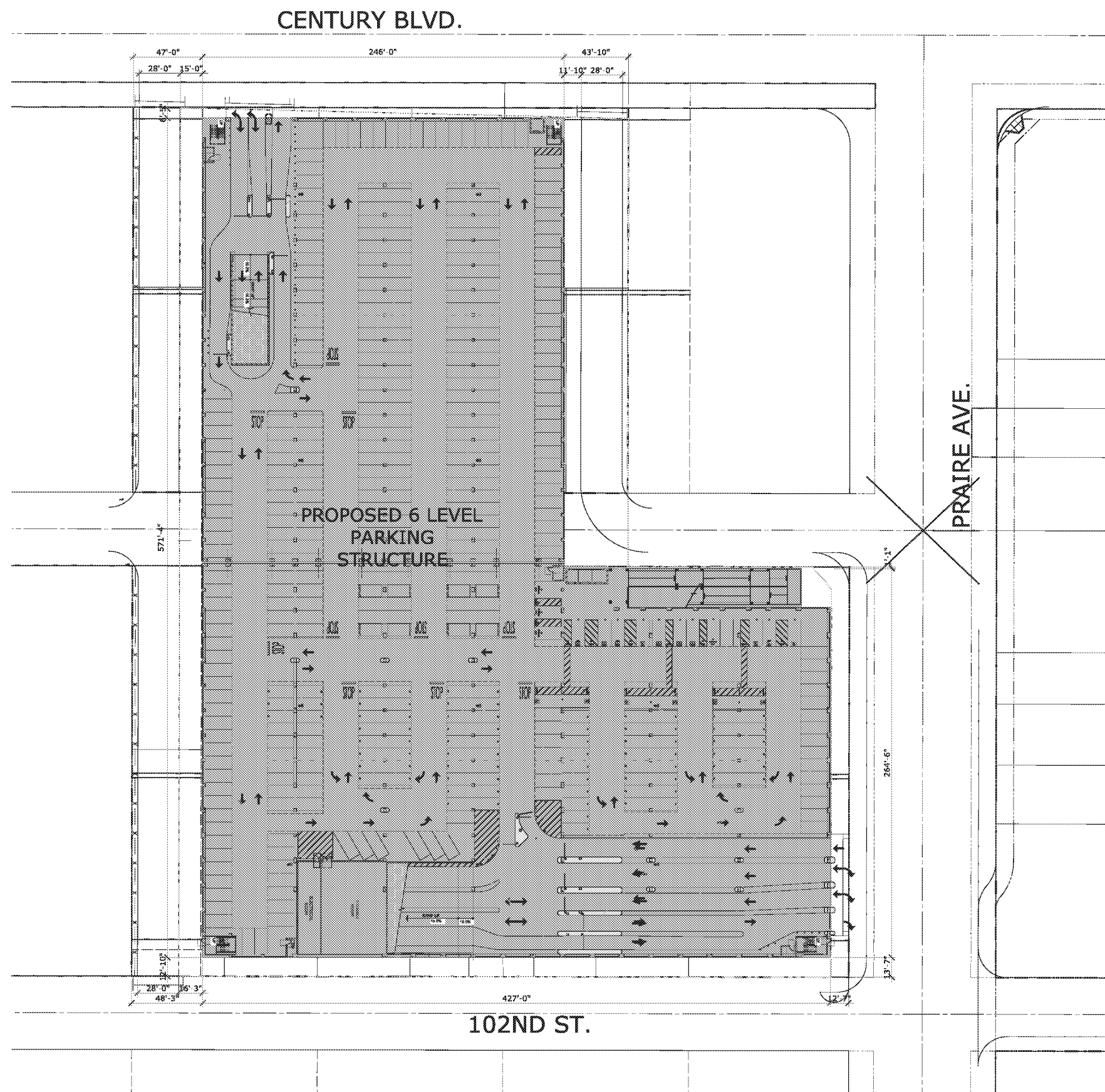


LEGEND

- RIGHT OF WAY
- CENTERLINE
- PROPOSED FENCE
- PROPOSED WALL
- EXISTING 101<sup>ST</sup> ST. TO BE VACATED PER SEPARATE CITY ACTION
- PROPOSED FIRE ACCESS, UTILITY EASEMENT, & PRIVATE ROAD



Project Management: [Name]  
Lead Planner: [Name]  
Planner: [Name]



CENTURY BLVD.

PRAIRIE AVE.

PROPOSED 6 LEVEL  
PARKING  
STRUCTURE

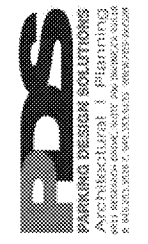
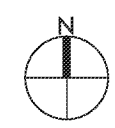
102ND ST.

TIERS	STALL BREAKDOWNS				TOTAL
	Accessible		Compact	Standard	
	Standard	Var			
TIER 1	3	3	8	190	210
TIER 2	22	4	40	172	184
TIER 3			28	168	332
TIER 4			29	257	545
TIER 5			32	406	508
TIER 6			32	252	347
<b>TOTALS</b>		42	169	1,425	1,474

SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED

ENLARGED SITE PLAN

1:30



DISCUSSION DRAFT

INGLEWOOD BASKETBALL & ENTERTAINMENT  
CENTER WEST PARKING STRUCTURE  
INGLEWOOD, CALIFORNIA

ENLARGED  
SITE PLAN

JOB NO. 2009-040  
DATE: 04.02.20  
DRAWN BY: JEC  
SCALE: As Noted  
CHECKED BY: OR

A102

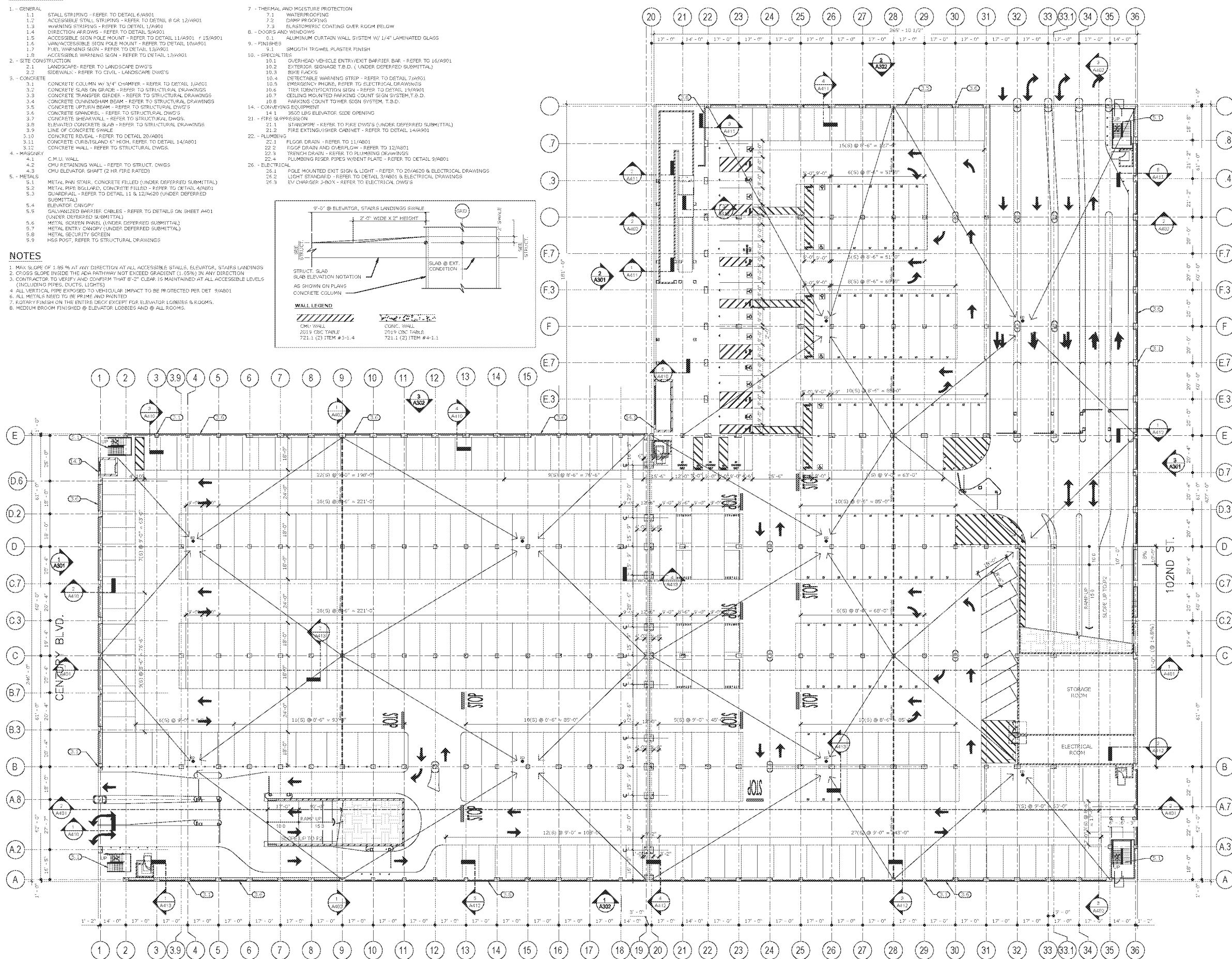
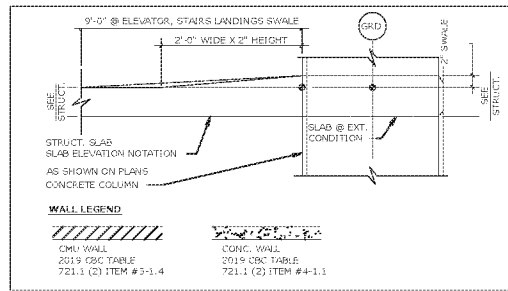


**KEY NOTES**

1. - GENERAL
  - 1.1 STALL STRIPING - REFER TO DETAIL 6/A901
  - 1.2 ACCESSIBLE STALL STRIPING - REFER TO DETAIL 8 OR 12/A901
  - 1.3 WARNING STRIPING - REFER TO DETAIL 1/A901
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A901
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A901 & 15/A901
  - 1.6 VAN/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A901
  - 1.7 PUEL WARNING SIGN - REFER TO DETAIL 13/A901
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 13/A901
2. - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWG'S
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWG'S
3. - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A901
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE CLAMPING BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE UPPER BEAM - REFER TO STRUCTURAL DWG'S
  - 3.6 CONCRETE SPANDREL - REFER TO STRUCTURAL DWG'S
  - 3.7 CONCRETE SHEARWALL - REFER TO STRUCTURAL DWG'S
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 26/A901
  - 3.11 CONCRETE CURB/ISLAND 1" HIGH - REFER TO DETAIL 14/A901
  - 3.12 CONCRETE WALL - REFER TO STRUCTURAL DWG'S
4. - MASONRY
  - 4.1 C.M.U. WALL
  - 4.2 C.M.U. RETAINING WALL - REFER TO STRUCT. DWG'S
  - 4.3 C.M.U. ELEVATOR SHAFT (2 HR FIRE RATED)
5. - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A901
  - 5.3 CHANDRIAL - REFER TO DETAIL 11 & 12/A901 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A401 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SCREEN PANEL (UNDER DEFERRED SUBMITTAL)
  - 5.7 METAL ENTRY CANOPY (UNDER DEFERRED SUBMITTAL)
  - 5.8 METAL SECURITY SCREEN
  - 5.9 HSS POST, REFER TO STRUCTURAL DRAWINGS
7. - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERPROOFING
  - 7.2 DAM PROOFING
  - 7.3 ELASTOMERIC COATING OVER ROUGH BELOW
8. - DOORS AND WINDOWS
  - 8.1 ALUMINUM CURTAIN WALL SYSTEM W/ 1/4" LAMINATED GLASS
9. - FINISHES
  - 9.1 SMOOTH TRIGWEL PLASTER FINISH
10. - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTRVEXIT BARRIER BAR - REFER TO 16/A901
  - 10.2 EXTERIOR SIGNAGE T.B.D. ( UNDER DEFERRED SUBMITTAL)
  - 10.3 BIKE RACKS
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A901
  - 10.5 EMERGENCY PHONE, REFER TO ELECTRICAL DRAWINGS
  - 10.6 TIER IDENTIFICATION SIGN - REFER TO DETAIL 19/A901
  - 10.7 CEILING MOUNTED PARKING COUNT SIGN SYSTEM, T.B.D.
  - 10.8 PARKING COUNT TOWER SIGN SYSTEM, T.B.D.
14. - COMMUNITY EQUIPMENT
  - 14.1 3500 LBS ELEVATOR SIDE OPENING
21. - FIRE SUPPRESSION
  - 21.1 STRIPDRIVE - REFER TO FIRE DWG'S (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A901
22. - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A901
  - 22.2 ROOF DRAIN AND OVERFLOW - REFER TO 12/A901
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER PIPES W/SEIT PLATE - REFER TO DETAIL 9/A901
26. - ELECTRICAL
  - 26.1 POLE MOUNTED EXT SIGN & LIGHT - REFER TO 20/A901 & ELECTRICAL DRAWINGS
  - 26.2 LIGHT STANDARD - REFER TO DETAIL 3/A901 & ELECTRICAL DRAWINGS
  - 26.3 EV CHARGER J-BOX X - REFER TO ELECTRICAL DWG'S

**NOTES**

1. MAX SLOPE OF 1.95% AT ANY DIRECTION AT ALL ACCESSIBLE STALLS, ELEVATOR, STAIRS LANDINGS
2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.55%) IN ANY DIRECTION
3. CONTRACTOR TO VERIFY AND CONFIRM THAT 8" CURB IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
4. ALL VERTICAL PIPE EXPOSED TO VENTILATOR IMPACT TO BE PROTECTED PER DET 9/A901
5. ALL METALS NEED TO BE PRIME AND PAINTED
6. RIGID FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS.
7. MEDIUM BRUSH FINISHED @ ELEVATOR LOBBIES AND @ ALL ROOMS.

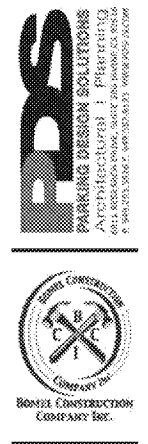


SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED

TIER P1 FLOOR PLAN



DISCUSSION DRAFT



**INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE**  
 INGLEWOOD, CALIFORNIA

TIER P1 FLOOR PLAN

JOB NO: 8250-046  
 DATE: 08.27.20  
 DRAWN BY: JSC  
 SCALE: As Noted  
 CHECKED BY: JSC

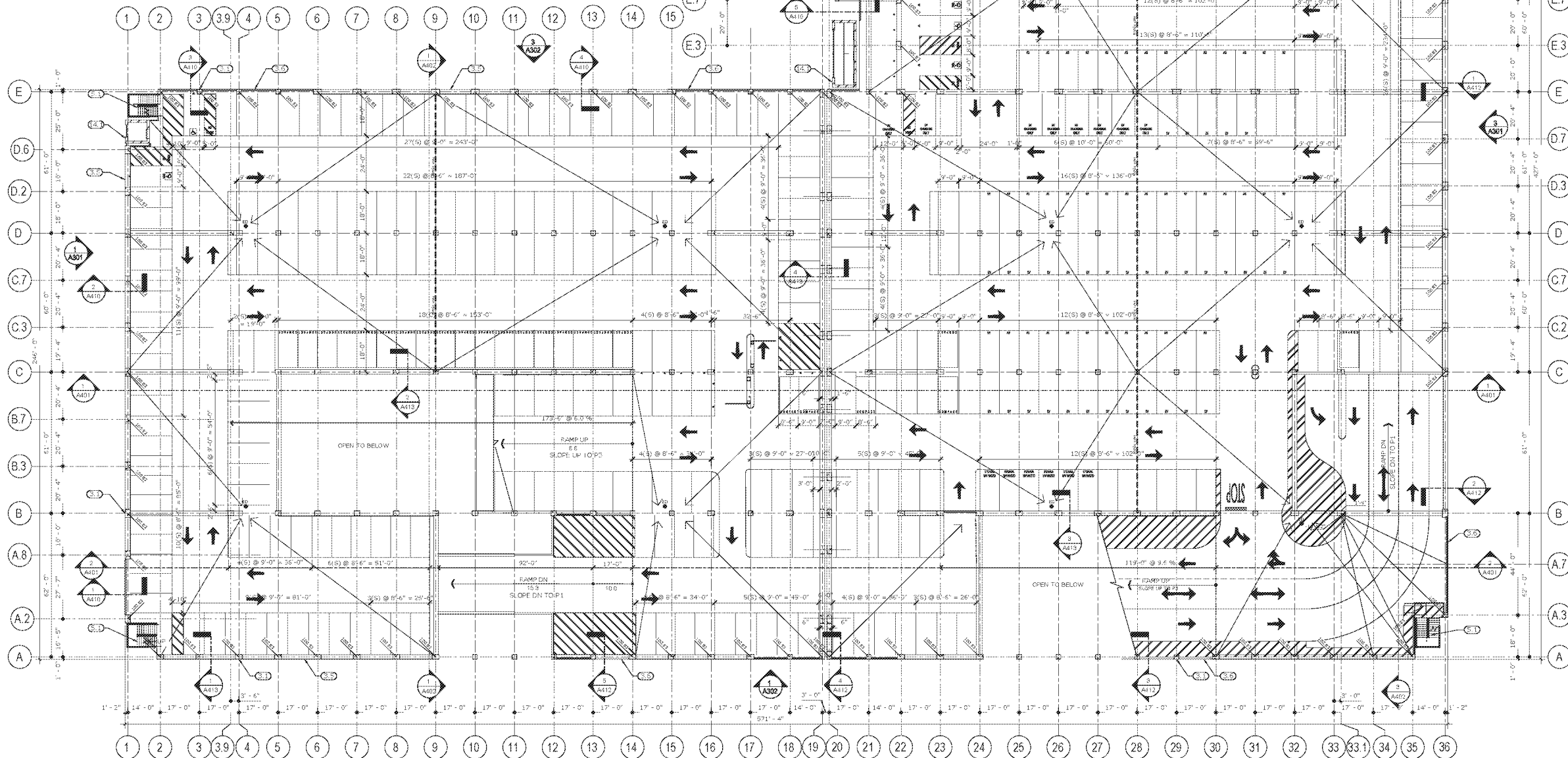
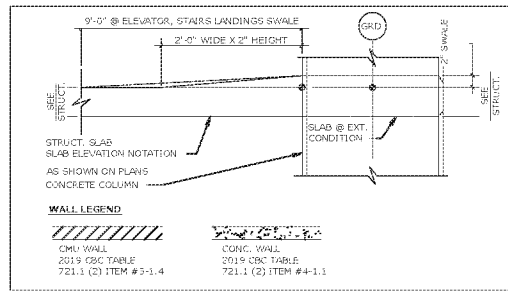
**A201**

**KEY NOTES**

1. - GENERAL
  - 1.1 STALL STRIPING - REFER TO DETAIL 6/A901
  - 1.2 ACCESSIBLE STALL STRIPING - REFER TO DETAIL 8 OR 12/A901
  - 1.3 WARNING STRIPING - REFER TO DETAIL 1/A901
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A901
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A901 & 15/A901
  - 1.6 VAN/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A901
  - 1.7 PUEL WARNING SIGN - REFER TO DETAIL 13/A901
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 13/A901
2. - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWG'S
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWG'S
3. - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A901
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE CLIPPINGHAM BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE UPPER BEAM - REFER TO STRUCTURAL DWG'S
  - 3.6 CONCRETE SPANDREL - REFER TO STRUCTURAL DWG'S
  - 3.7 CONCRETE SHEARWALL - REFER TO STRUCTURAL DWG'S
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 26/A901
  - 3.11 CONCRETE CURB/ISLAND 1" HIGH - REFER TO DETAIL 14/A901
  - 3.12 CONCRETE WALL - REFER TO STRUCTURAL DWG'S
4. - MASONRY
  - 4.1 C.M.U. WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWGS
  - 4.3 CMU ELEVATOR SHAFT (2 HR FIRE RATED)
5. - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A901
  - 5.3 CHANDRIAL - REFER TO DETAIL 11 & 12/A901 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A401 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SCREEN PANEL (UNDER DEFERRED SUBMITTAL)
  - 5.7 METAL ENTRY CANOPY (UNDER DEFERRED SUBMITTAL)
  - 5.8 METAL SECURITY SCREEN
  - 5.9 HSS POST, REFER TO STRUCTURAL DRAWINGS
7. - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERPROOFING
  - 7.2 DAMP PROOFING
  - 7.3 ELASTOMERIC COATING OVER ROUGH BELOW
8. - DOORS AND WINDOWS
  - 8.1 ALUMINUM CURTAIN WALL SYSTEM W/ 1/4" LAMINATED GLASS
9. - FINISHES
  - 9.1 SMOOTH TRIGWEL PLASTER FINISH
10. - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTRY/EXIT BARRIER BAR - REFER TO 16/A901
  - 10.2 EXTERIOR SIGNAGE T.B.D. ( UNDER DEFERRED SUBMITTAL)
  - 10.3 BIVE JACKS
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A901
  - 10.5 EMERGENCY PHONE, REFER TO ELECTRICAL DRAWINGS
  - 10.6 TIER IDENTIFICATION SIGN - REFER TO DETAIL 19/A901
  - 10.7 CEILING MOUNTED PARKING COUNT SIGN SYSTEM, T.B.D.
  - 10.8 PARKING COUNT TOWER SIGN SYSTEM, T.B.D.
14. - COMMING EQUIPMENT
  - 14.1 3500 LBS ELEVATOR SIDE OPENING
21. - FIRE SUPPRESSION
  - 21.1 STRAWPIPE - REFER TO FIRE DWG'S (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A901
22. - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A901
  - 22.2 ROOF DRAIN AND OVERFLOW - REFER TO 12/A901
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER PIPES W/SEIT PLATE - REFER TO DETAIL 9/A901
26. - ELECTRICAL
  - 26.1 POLE MOUNTED EXT SIGN & LIGHT - REFER TO 20/A901 & ELECTRICAL DRAWINGS
  - 26.2 LIGHT STANDARDS - REFER TO DETAIL 3/A901 & ELECTRICAL DRAWINGS
  - 26.3 EV CHARGER J-BOX - REFER TO ELECTRICAL DWG'S

**NOTES**

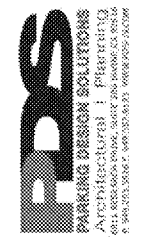
1. MAX SLOPE OF 1.95% AT ANY DIRECTION AT ALL ACCESSIBLE STALLS, ELEVATOR, STAIRS LANDINGS
2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.5%) IN ANY DIRECTION
3. CONTRACTOR TO VERIFY AND CONFIRM THAT 2" CLEAR IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
4. ALL VERTICAL PIPE EXPOSED TO VENTILATION IMPACT TO BE PROTECTED PER DET 9/A901
5. ALL METALS NEED TO BE PRIME AND PAINTED
6. RIGIDITY FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS.
7. MEDIUM BROOM FINISHED @ ELEVATOR LOBBIES AND @ ALL ROOMS.



SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED

TIER P2 FLOOR PLAN  
1/20 N

DISCUSSION DRAFT



**INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE**  
 INGLEWOOD, CALIFORNIA

TIER P2 FLOOR PLAN

JOB NO: 0250-046  
 DATE: 08.27.20  
 DRAWN BY: JBC  
 SCALE: As Noted  
 CHECKED BY: JBC

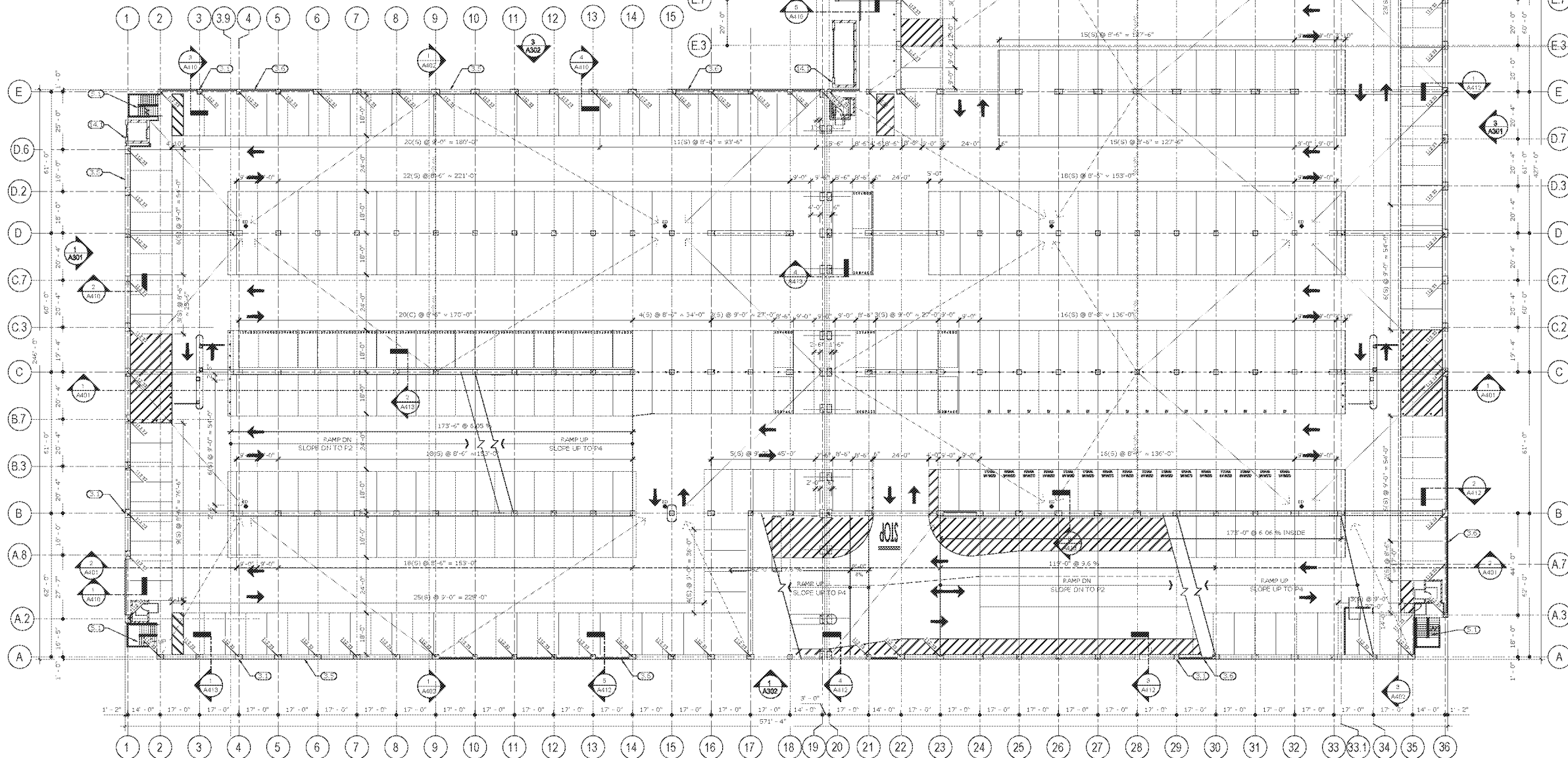
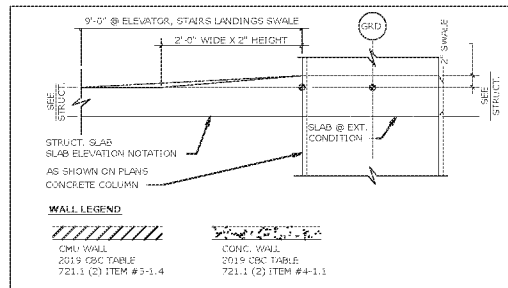
**A202**

KEY NOTES

- 1. - GENERAL
  - 1.1 STALL STRIPING - REFER TO DETAIL 6/A201
  - 1.2 ACCESSIBLE STALL STRIPING - REFER TO DETAIL 8 OR 12/A201
  - 1.3 WARNING STRIPING - REFER TO DETAIL 1/A201
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A201
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A201 & 15/A201
  - 1.6 VAN/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A201
  - 1.7 PUEL WARNING SIGN - REFER TO DETAIL 13/A201
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 13/A201
- 2. - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWG'S
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWG'S
- 3. - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A201
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE CLIPPINGHAM BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE UPPER BEAM - REFER TO STRUCTURAL DWG'S
  - 3.6 CONCRETE SPANDREL - REFER TO STRUCTURAL DWG'S
  - 3.7 CONCRETE SHEARWALL - REFER TO STRUCTURAL DWG'S
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 26/A201
  - 3.11 CONCRETE CURB/BLIND 1" HIGH - REFER TO DETAIL 14/A201
  - 3.12 CONCRETE WALL - REFER TO STRUCTURAL DWG'S
- 4. - MASONRY
  - 4.1 C.M.U. WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWG'S
  - 4.3 CMU ELEVATOR SHAFT (2 HR FIRE RATED)
- 5. - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A201
  - 5.3 CHANDRIAL - REFER TO DETAIL 11 & 12/A201 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A401 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SCREEN PANEL (UNDER DEFERRED SUBMITTAL)
  - 5.7 METAL ENTRY CANOPY (UNDER DEFERRED SUBMITTAL)
  - 5.8 METAL SECURITY SCREEN
  - 5.9 HSS POST, REFER TO STRUCTURAL DRAWINGS
- 7. - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERPROOFING
  - 7.2 DAM PROOFING
  - 7.3 ELASTOMERIC COATING OVER ROUGH BELOW
- 8. - DOORS AND WINDOWS
  - 8.1 ALUMINUM CURTAIN WALL SYSTEM W/ 1/4" LAMINATED GLASS
- 9. - FINISHES
  - 9.1 SMOOTH TRIGWEL PLASTER FINISH
- 10. - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTR/EXIT BARRIER BAR - REFER TO 16/A201
  - 10.2 EXTERIOR SIGNAGE T.B.D. ( UNDER DEFERRED SUBMITTAL)
  - 10.3 BIWE JACKS
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A201
  - 10.5 EMERGENCY PHONE, REFER TO ELECTRICAL DRAWINGS
  - 10.6 TIEB IDENTIFICATION SIGN - REFER TO DETAIL 19/A201
  - 10.7 CEILING MOUNTED PARKING COUNT SIGN SYSTEM, T.B.D.
  - 10.8 PARKING COUNT TOWER SIGN SYSTEM, T.B.D.
- 14. - COMMING EQUIPMENT
  - 14.1 3500 LBS ELEVATOR SIDE OPENING
- 21. - FIRE SUPPRESSION
  - 21.1 STRAWPIPE - REFER TO FIRE DWG'S (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A201
- 22. - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A201
  - 22.2 ROOF DRAIN AND OVERFLOW - REFER TO 12/A201
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER PIPES W/SENT PLATE - REFER TO DETAIL 9/A201
- 26. - ELECTRICAL
  - 26.1 POLE MOUNTED EXT SIGN & LIGHT - REFER TO 20/A202 & ELECTRICAL DRAWINGS
  - 26.2 LIGHT STRAND - REFER TO DETAIL 9/A201 & ELECTRICAL DRAWINGS
  - 26.3 EV CHARGER J-BOX X - REFER TO ELECTRICAL DWG'S

NOTES

- 1. MAX SLOPE OF 1.95% AT ANY DIRECTION AT ALL ACCESSIBLE STALLS, ELEVATOR, STAIRS LANDINGS
- 2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.55%) IN ANY DIRECTION
- 3. CONTRACTOR TO VERIFY AND CONFIRM THAT 8" CURB IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
- 4. ALL VERTICAL PIPE EXPOSED TO VENTILATOR IMPACT TO BE PROTECTED PER DET 9/A201
- 5. ALL METALS NEED TO BE PRIME AND PAINTED
- 6. RIGIDITY FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS.
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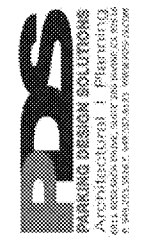


SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED

TIER P3 FLOOR PLAN



DISCUSSION DRAFT



INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE  
INGLEWOOD, CALIFORNIA

TIER P3 FLOOR PLAN

JOB NO. 2020-046  
DATE: 08.27.20  
DRAWN BY: JBC  
SCALE: As Noted  
CHECKED BY: JBC

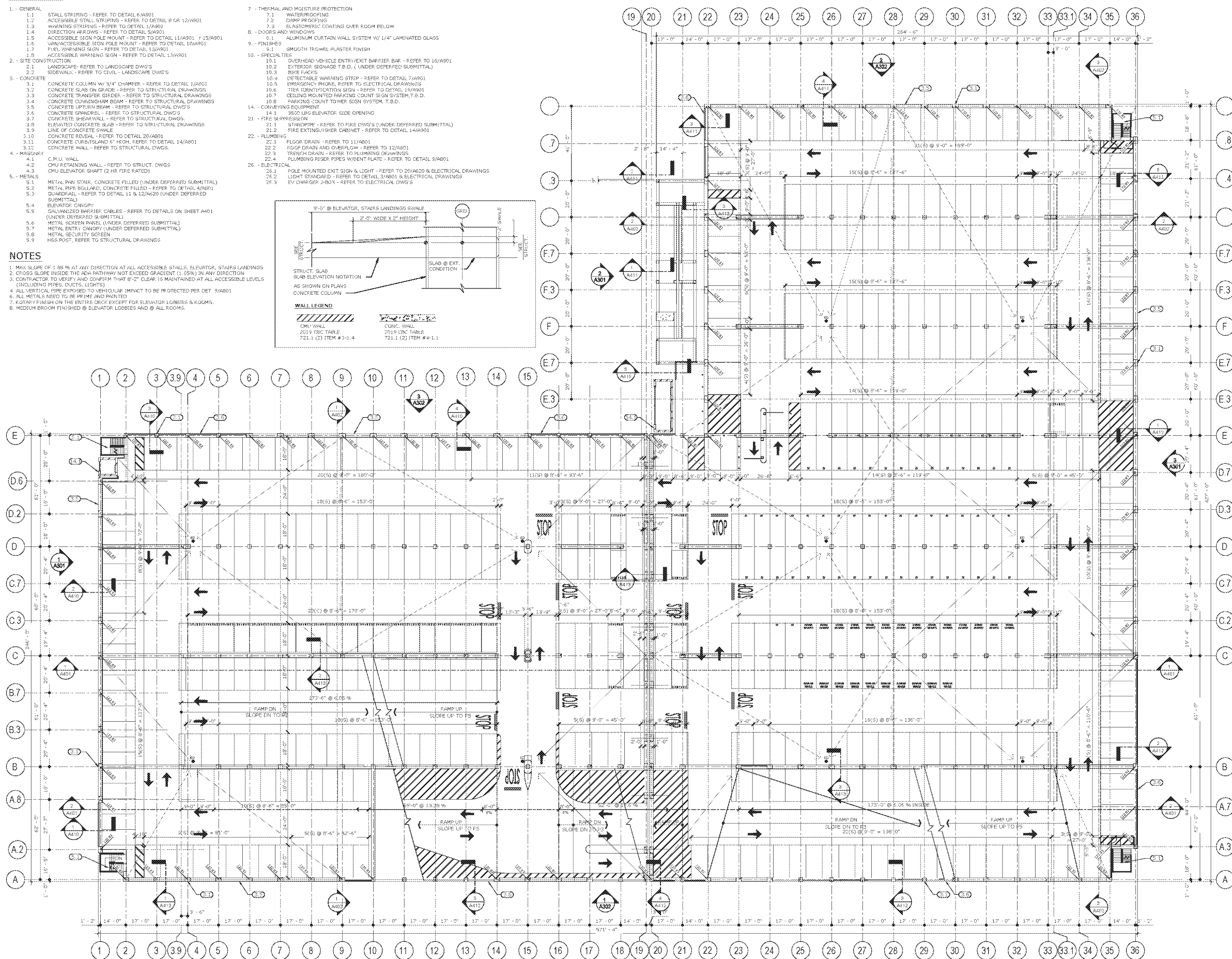
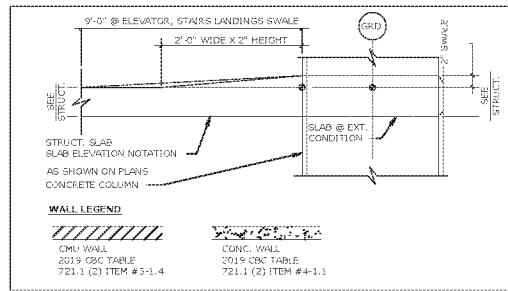
A203

**KEY NOTES**

- 1. - GENERAL
  - 1.1 STALL STRIPING - REFER TO DETAIL 6/A901
  - 1.2 ACCESSIBLE STALL STRIPING - REFER TO DETAIL 8 OR 12/A901
  - 1.3 WARNING STRIPING - REFER TO DETAIL 1/A901
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A901
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A901 & 15/A901
  - 1.6 VAN/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A901
  - 1.7 PUEL WARNING SIGN - REFER TO DETAIL 13/A901
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 13/A901
- 2. - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWG'S
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWG'S
- 3. - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A901
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE CLAMPING BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE UPPER BEAM - REFER TO STRUCTURAL DWG'S
  - 3.6 CONCRETE SPANDREL - REFER TO STRUCTURAL DWG'S
  - 3.7 CONCRETE SHEARWALL - REFER TO STRUCTURAL DWG'S
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 26/A901
  - 3.11 CONCRETE CURB/BLIND 1" HIGH - REFER TO DETAIL 14/A901
  - 3.12 CONCRETE WALL - REFER TO STRUCTURAL DWG'S
- 4. - MASONRY
  - 4.1 C.M.U. WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWGS
  - 4.3 CMU ELEVATOR SHAFT (2 HR FIRE RATED)
- 5. - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A901
  - 5.3 CHANDRIAL - REFER TO DETAIL 11 & 12/A901 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A401 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SCREEN PANEL (UNDER DEFERRED SUBMITTAL)
  - 5.7 METAL ENTRY CANOPY (UNDER DEFERRED SUBMITTAL)
  - 5.8 METAL SECURITY SCREEN
  - 5.9 HSS POST, REFER TO STRUCTURAL DRAWINGS
- 6. - DOORS AND WINDOWS
  - 6.1 ALUMINUM CURTAIN WALL SYSTEM W/ 1/4" LAMINATED GLASS
- 7. - FINISHES
  - 7.1 SMOOTH TRIGWEL PLASTER FINISH
- 8. - SPECIALTIES
  - 8.1 OVERHEAD VEHICLE ENTR/EXIT BARRIER BAR - REFER TO 16/A901
  - 8.2 EXTERIOR SIGNAGE T.B.D. ( UNDER DEFERRED SUBMITTAL)
  - 8.3 BIWE JACKS
  - 8.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A901
  - 8.5 EMERGENCY PHONE, REFER TO ELECTRICAL DRAWINGS
  - 8.6 TIEB IDENTIFICATION SIGN - REFER TO DETAIL 19/A901
  - 8.7 CEILING MOUNTED PARKING COUNT SIGN SYSTEM, T.B.D.
  - 8.8 PARKING COUNT TOWER SIGN SYSTEM, T.B.D.
- 9. - EQUIPMENT
  - 9.1 5500 LBS ELEVATOR SIDE OPENING
- 10. - FIRE SUPPRESSION
  - 10.1 STRAWROPE - REFER TO FIRE DWG'S (UNDER DEFERRED SUBMITTAL)
  - 10.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A901
- 11. - PLUMBING
  - 11.1 FLOOR DRAIN - REFER TO 11/A901
  - 11.2 RIGID DRAIN AND OVERFLOW - REFER TO 12/A901
  - 11.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 11.4 PLUMBING RISER PIPES W/SENT PLATE - REFER TO DETAIL 9/A901
- 12. - ELECTRICAL
  - 12.1 POLE MOUNTED EXT SIGN & LIGHT - REFER TO 20/A901 & ELECTRICAL DRAWINGS
  - 12.2 LIGHT SIGNAGE - REFER TO DETAIL 3/A901 & ELECTRICAL DRAWINGS
  - 12.3 EV CHARGER J-BOX X - REFER TO ELECTRICAL DWG'S

**NOTES**

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- 2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.5%) IN ANY DIRECTION
- 3. CONTRACTOR TO VERIFY AND CONFIRM THAT 8" CLEAR IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
- 4. ALL VERTICAL PIPE EXPOSED TO VENTILATOR IMPACT TO BE PROTECTED PER DET 9/A901
- 5. ALL METALS NEED TO BE PRIME AND PAINTED
- 6. RIGID FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS.
- 7. MEDIUM BROOM FINISHED @ ELEVATOR LOBBIES AND @ ALL ROOMS.

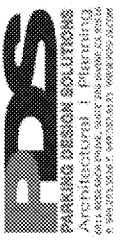


SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED

TIER P4 FLOOR PLAN



DISCUSSION DRAFT



**INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE**  
 INGLEWOOD, CALIFORNIA

**TIER P4 FLOOR PLAN**

JOB NO: 0250-046  
 DATE: 08.27.20  
 DRAWN BY: JBC  
 SCALE: As Noted  
 CHECKED BY: JBC

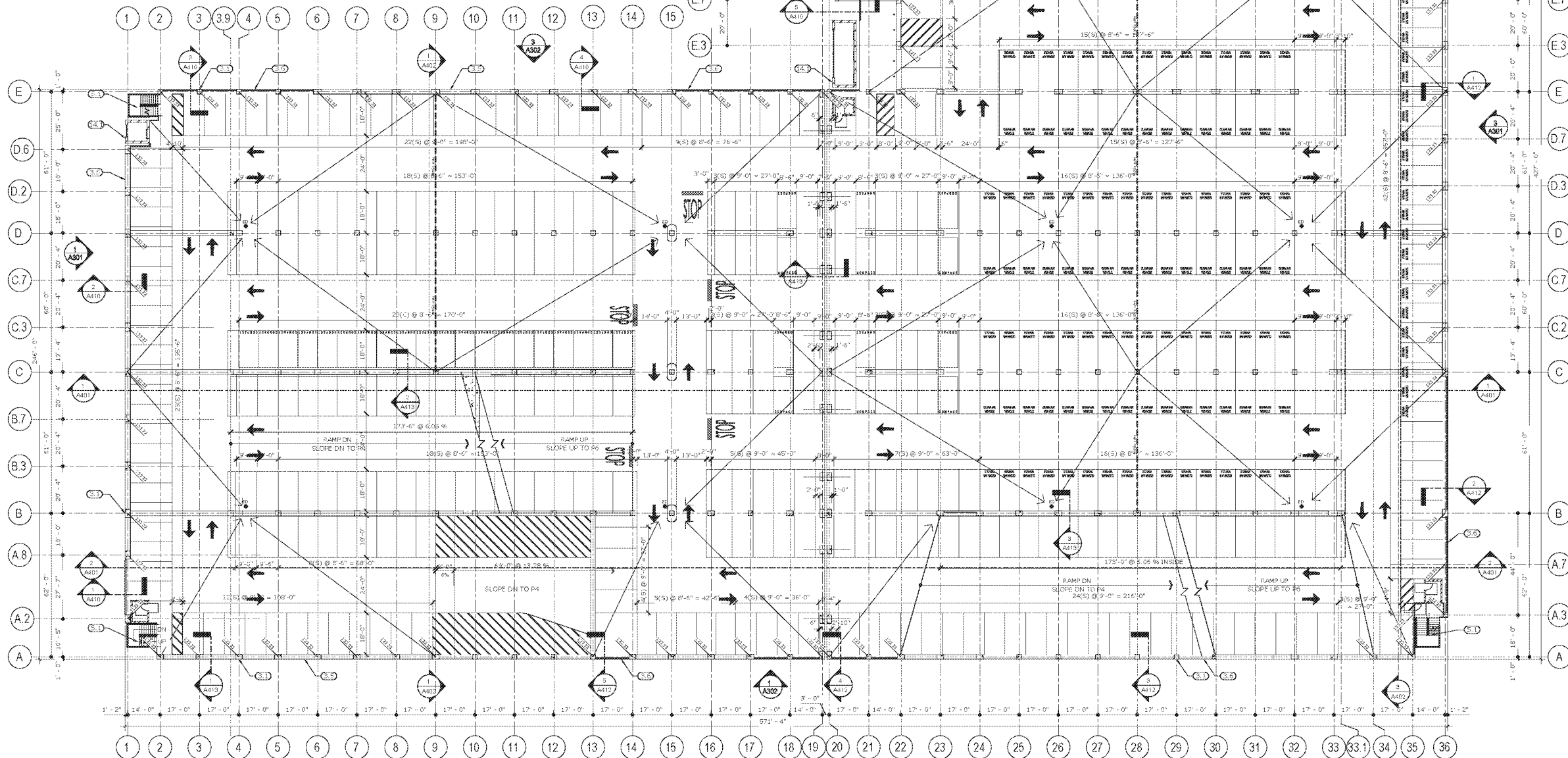
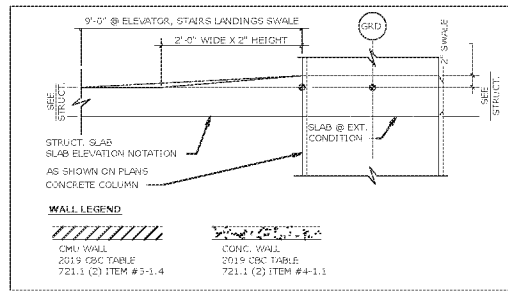
**A204**

**KEY NOTES**

1. - GENERAL
  - 1.1 STALL STRIPING - REFER TO DETAIL 6/A901
  - 1.2 ACCESSIBLE STALL STRIPING - REFER TO DETAIL 8 OR 12/A901
  - 1.3 WARNING STRIPING - REFER TO DETAIL 1/A901
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A901
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A901 & 15/A901
  - 1.6 VAN/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A901
  - 1.7 PUEL WARNING SIGN - REFER TO DETAIL 13/A901
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 13/A901
2. - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWG'S
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWG'S
3. - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A901
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE CLAMPING BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE UPPER BEAM - REFER TO STRUCTURAL DWG'S
  - 3.6 CONCRETE SPANDREL - REFER TO STRUCTURAL DWG'S
  - 3.7 CONCRETE SHEARWALL - REFER TO STRUCTURAL DWG'S
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 26/A901
  - 3.11 CONCRETE CURB/ISLAND 1" HIGH - REFER TO DETAIL 14/A901
  - 3.12 CONCRETE WALL - REFER TO STRUCTURAL DWG'S
4. - MASONRY
  - 4.1 C.M.U. WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWGS
  - 4.3 CMU ELEVATOR SHAFT (2 HR FIRE RATED)
5. - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A901
  - 5.3 CHAIRRAIL - REFER TO DETAIL 11 & 12/A901 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A401 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SCREEN PANEL (UNDER DEFERRED SUBMITTAL)
  - 5.7 METAL ENTRY CANOPY (UNDER DEFERRED SUBMITTAL)
  - 5.8 METAL SECURITY SCREEN
  - 5.9 HSS POST, REFER TO STRUCTURAL DRAWINGS
7. - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERPROOFING
  - 7.2 DAM PROOFING
  - 7.3 ELASTOMERIC COATING OVER ROUGH BELOW
8. - DOORS AND WINDOWS
  - 8.1 ALUMINUM CURTAIN WALL SYSTEM W/ 1/4" LAMINATED GLASS
9. - FINISHES
  - 9.1 SMOOTH TRIGWEL PLASTER FINISH
10. - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTR/EXIT BARRIER BAR - REFER TO 16/A901
  - 10.2 EXTERIOR SIGNAGE T.B.D. ( UNDER DEFERRED SUBMITTAL)
  - 10.3 BIWE JACKS
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A901
  - 10.5 EMERGENCY PHONE, REFER TO ELECTRICAL DRAWINGS
  - 10.6 TIEB IDENTIFICATION SIGN - REFER TO DETAIL 19/A901
  - 10.7 CEILING MOUNTED PARKING COUNT SIGN SYSTEM, T.B.D.
  - 10.8 PARKING COUNT TOWER SIGN SYSTEM, T.B.D.
14. - COMMUNITY EQUIPMENT
  - 14.1 3500 LBS ELEVATOR SIDE OPENING
21. - FIRE SUPPRESSION
  - 21.1 STRAWPIPE - REFER TO FIRE DWG'S (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A901
22. - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A901
  - 22.2 RIGID DRAIN AND OVERFLOW - REFER TO 12/A901
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER PIPES W/SENT PLATE - REFER TO DETAIL 9/A901
26. - ELECTRICAL
  - 26.1 POLE MOUNTED EXT SIGN & LIGHT - REFER TO 20/A901 & ELECTRICAL DRAWINGS
  - 26.2 LIGHT STANDARD - REFER TO DETAIL 3/A901 & ELECTRICAL DRAWINGS
  - 26.3 EV CHARGER J-BOX - REFER TO ELECTRICAL DWG'S

**NOTES**

1. MAX SLOPE OF 1.95% AT ANY DIRECTION AT ALL ACCESSIBLE STALLS, ELEVATOR, STAIRS LANDINGS
2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.5%) IN ANY DIRECTION
3. CONTRACTOR TO VERIFY AND CONFIRM THAT 8" CLEAR IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
4. ALL VERTICAL PIPE EXPOSED TO VENTILATOR IMPACT TO BE PROTECTED PER DET 9/A901
5. ALL METALS NEED TO BE PRIME AND PAINTED
6. RIGID FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS.
7. MEDIUM BROOM FINISHED @ ELEVATOR LOBBIES AND @ ALL ROOMS.

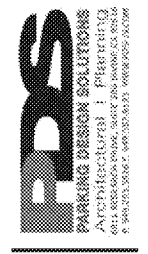


SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED

**TIER P5 FLOOR PLAN**



DISCUSSION DRAFT



**INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE**  
 INGLEWOOD, CALIFORNIA

**TIER P6 FLOOR PLAN**

JOB NO: 8256-046  
 DATE: 08.27.20  
 DRAWN BY: JBC  
 SCALE: As Noted  
 CHECKED BY: JBC

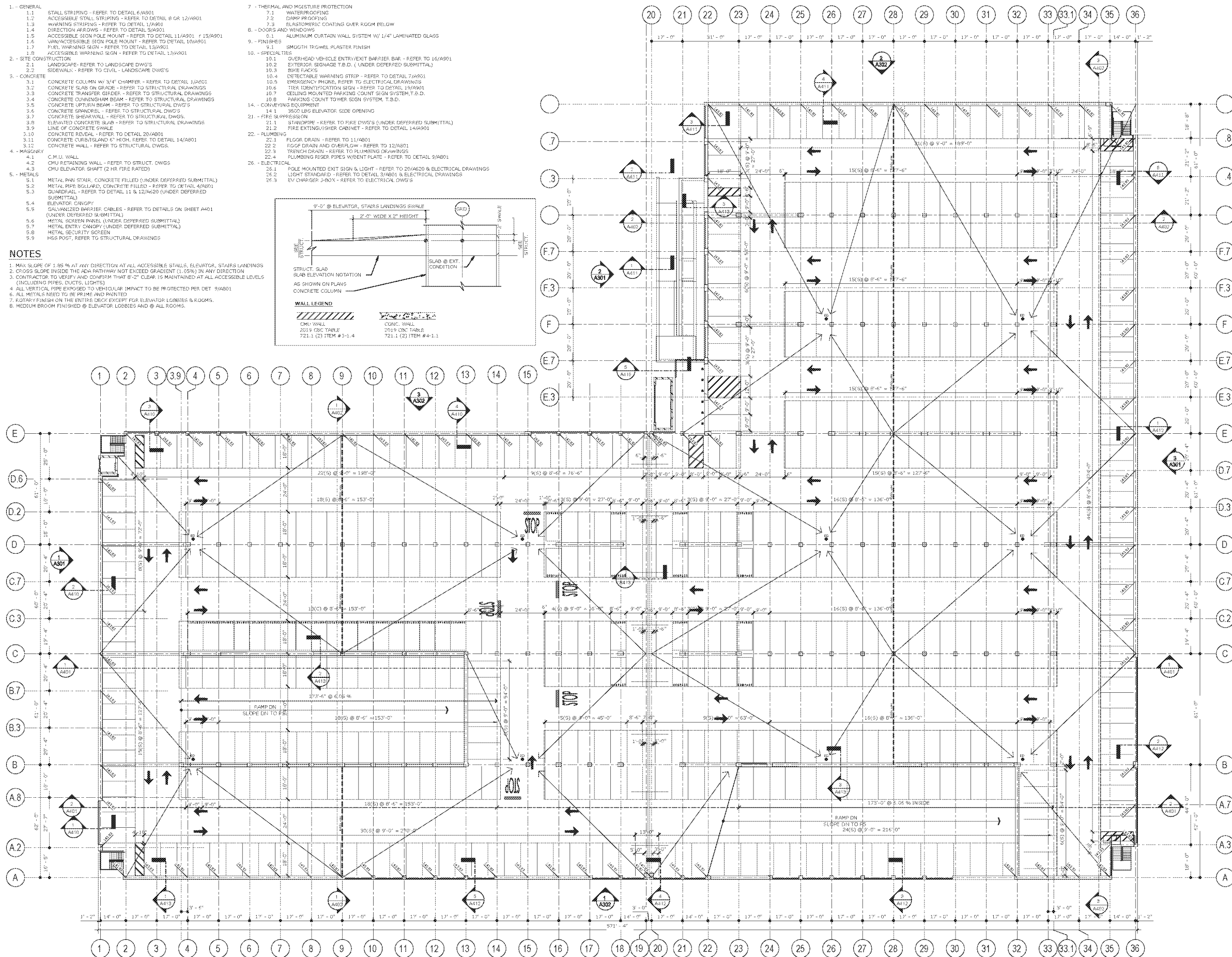
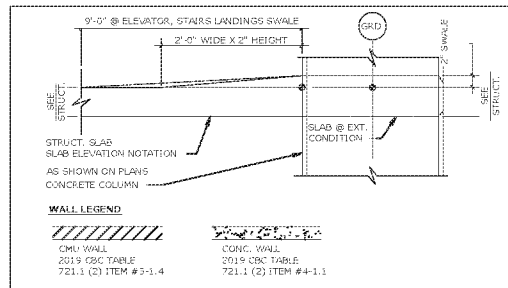
**A205**

**KEY NOTES**

1. - GENERAL
  - 1.1 STALL STRIPING - REFER TO DETAIL 6/A901
  - 1.2 ACCESSIBLE STALL STRIPING - REFER TO DETAIL 8 OR 12/A901
  - 1.3 WARNING STRIPING - REFER TO DETAIL 1/A901
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A901
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A901 & 15/A901
  - 1.6 VAN/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A901
  - 1.7 PUEL WARNING SIGN - REFER TO DETAIL 13/A901
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 13/A901
2. - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWGS
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWGS
3. - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A901
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE CLIPPINGHAM BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE UPPER BEAM - REFER TO STRUCTURAL DWGS
  - 3.6 CONCRETE SPANDREL - REFER TO STRUCTURAL DWGS
  - 3.7 CONCRETE SHEARWALL - REFER TO STRUCTURAL DWGS
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 26/A901
  - 3.11 CONCRETE CURB/ISLAND 1" HIGH, REFER TO DETAIL 14/A901
  - 3.12 CONCRETE WALL - REFER TO STRUCTURAL DWGS
4. - MASONRY
  - 4.1 C.M.U. WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWGS
  - 4.3 CMU ELEVATOR SHAFT (2 HR FIRE RATED)
5. - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A901
  - 5.3 CHAIRRAIL - REFER TO DETAIL 11 & 12/A901 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A401 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SCREEN PANEL (UNDER DEFERRED SUBMITTAL)
  - 5.7 METAL ENTRY CANOPY (UNDER DEFERRED SUBMITTAL)
  - 5.8 METAL SECURITY SCREEN
  - 5.9 HSS POST, REFER TO STRUCTURAL DRAWINGS
7. - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERPROOFING
  - 7.2 DAM PROFILES
  - 7.3 ELASTOMERIC COATING OVER ROUGH BELOW
8. - DOORS AND WINDOWS
  - 8.1 ALUMINUM CURTAIN WALL SYSTEM W/ 1/4" LAMINATED GLASS
9. - FINISHES
  - 9.1 SMOOTH TRIGWEL PLASTER FINISH
10. - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTR/EXIT BARRIER BAR - REFER TO 16/A901
  - 10.2 EXTERIOR SIGNAGE T.B.D. ( UNDER DEFERRED SUBMITTAL)
  - 10.3 BIVE JACKS
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A901
  - 10.5 EMERGENCY PHONE, REFER TO ELECTRICAL DRAWINGS
  - 10.6 TIEB IDENTIFICATION SIGN - REFER TO DETAIL 19/A901
  - 10.7 CEILING MOUNTED PARKING COUNT SIGN SYSTEM, T.B.D.
  - 10.8 PARKING COUNT TOWER SIGN SYSTEM, T.B.D.
14. - COMMUNITY EQUIPMENT
  - 14.1 3500 LBS ELEVATOR SIDE OPENING
21. - FIRE SUPPRESSION
  - 21.1 STRAFTER - REFER TO FIRE DWGS (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A901
22. - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A901
  - 22.2 RIGG DRAIN AND OVERFLOW - REFER TO 12/A901
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER PIPES W/SENT PLATE - REFER TO DETAIL 9/A901
26. - ELECTRICAL
  - 26.1 POLE MOUNTED EXT SIGN & LIGHT - REFER TO 20/A901 & ELECTRICAL DRAWINGS
  - 26.2 LIGHT STRIP - REFER TO DETAIL 9/A901 & ELECTRICAL DRAWINGS
  - 26.3 EV CHARGER J-BOX - REFER TO ELECTRICAL DWGS

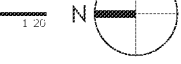
**NOTES**

1. MAX SLOPE OF 1.95% AT ANY DIRECTION AT ALL ACCESSIBLE STALLS, ELEVATOR, STAIRS LANDINGS
2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.5%) IN ANY DIRECTION
3. CONTRACTOR TO VERIFY AND CONFIRM THAT 8" CURB IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
4. ALL VERTICAL PIPE EXPOSED TO VENTILATOR IMPACT TO BE PROTECTED PER DET 9/A901
5. ALL METALS NEED TO BE PRIME AND PAINTED
6. RIGID FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS.
7. MEDIUM BROOM FINISHED @ ELEVATOR LOBBIES AND @ ALL ROOMS.

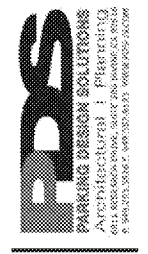


SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED

**TIER P6 FLOOR PLAN**



DISCUSSION DRAFT

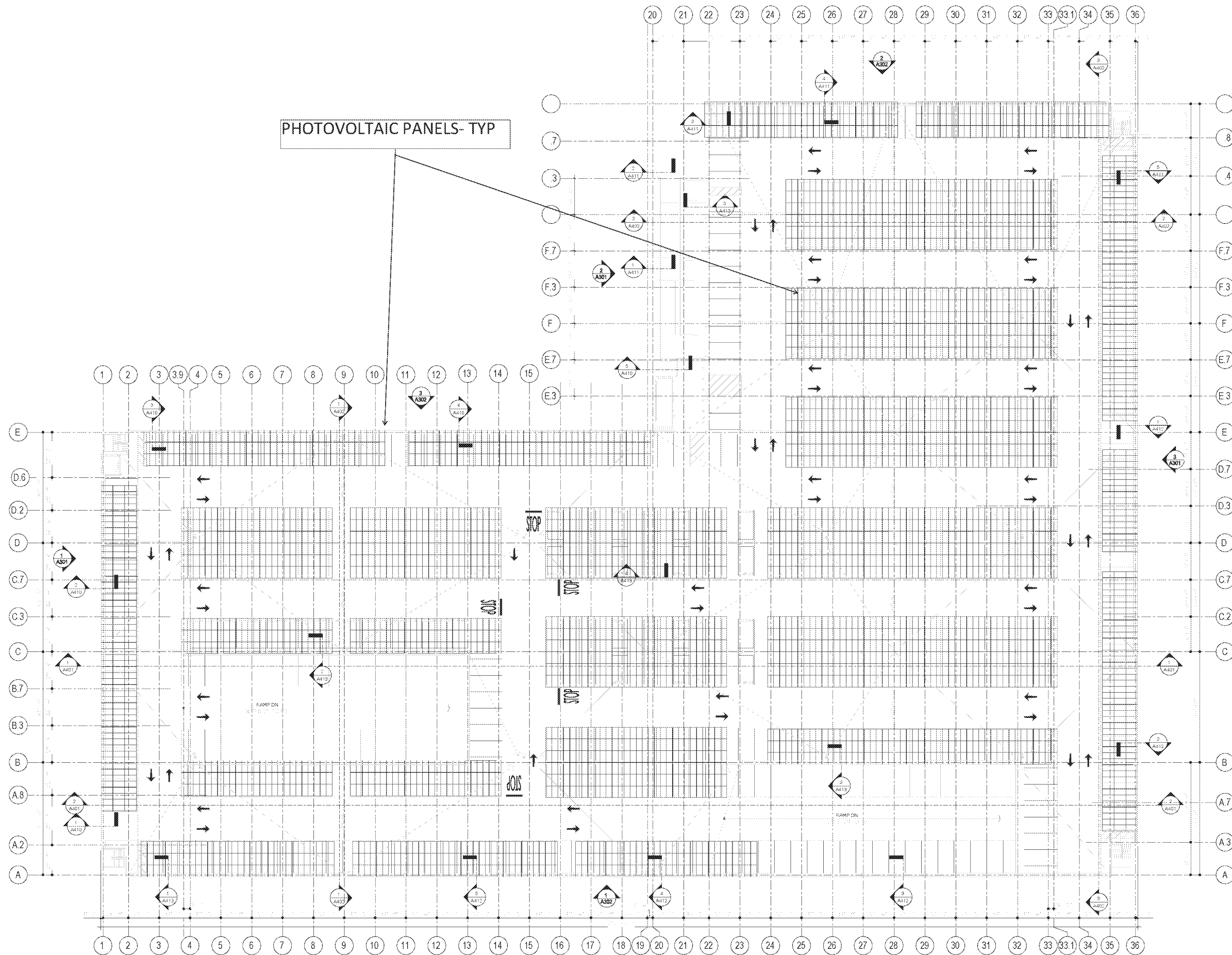


**INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE**  
 INGLEWOOD, CALIFORNIA

**TIER P6 FLOOR PLAN**

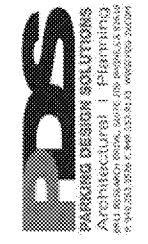
JOB NO: 2020-046  
 DATE: 08.27.20  
 DRAWN BY: JBC  
 SCALE: As Noted  
 CHECKED BY: JBC

**A206**



PHOTOVOLTAIC PANELS- TYP

TIER P6 FLOOR PLAN  
1/20 N



DISCUSSION DRAFT

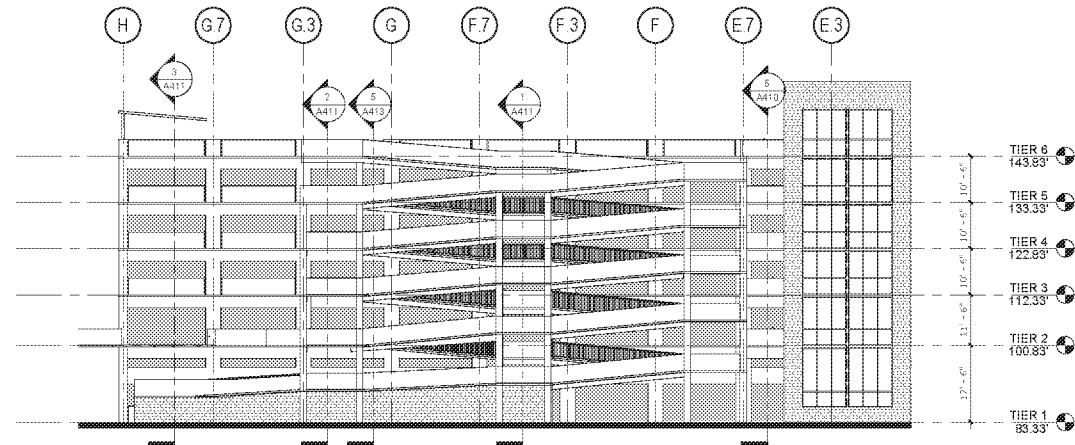
INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE  
INGLEWOOD, CALIFORNIA

TIER PV PANEL FLOOR PLAN

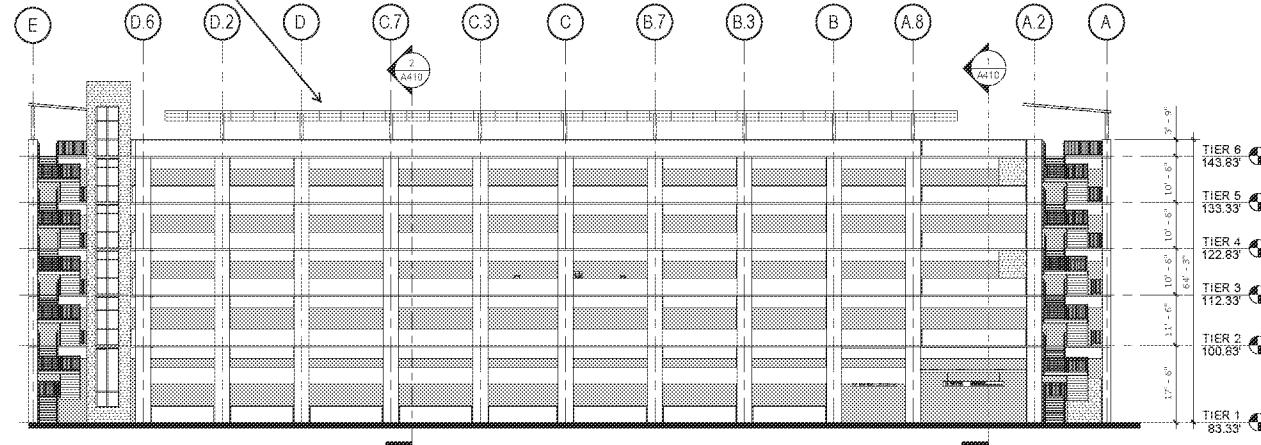
JOB NO. 0018-048  
DATE: 03.27.20  
DRAWN BY: JBC  
SCALE: As Noted  
CHECKED BY: GH

A207

PHOTOVOLTAIC PANEL - TYP



2 NORTH 2 ELEVATION  
1/16" = 1'-0"



1 NORTH 1 ELEVATION  
1/16" = 1'-0"

STAMP:

CONTRACTOR:  
DANIEL CONSTRUCTION COMPANY INC.  
CONSULTANT:

DISCUSSION DRAFT

INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE  
INGLEWOOD, CALIFORNIA

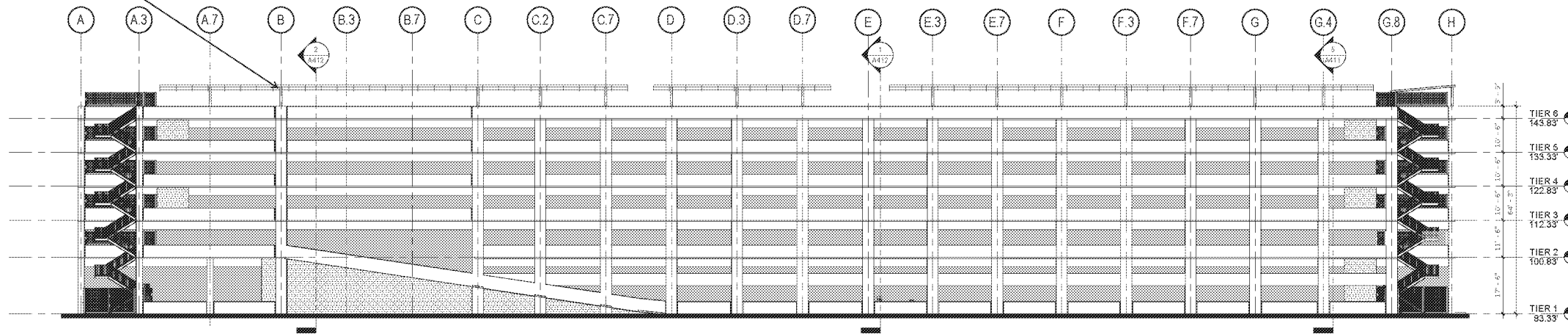
DATE	
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EXTERIOR BUILDING ELEVATIONS

JOB NO: 2018-046  
DATE: 05.11.20  
DRAWN BY: J.C.  
SCALE: As indicated  
CHECKED BY: G.R.

A301

PHOTOVOLTAIC PANEL - TYP



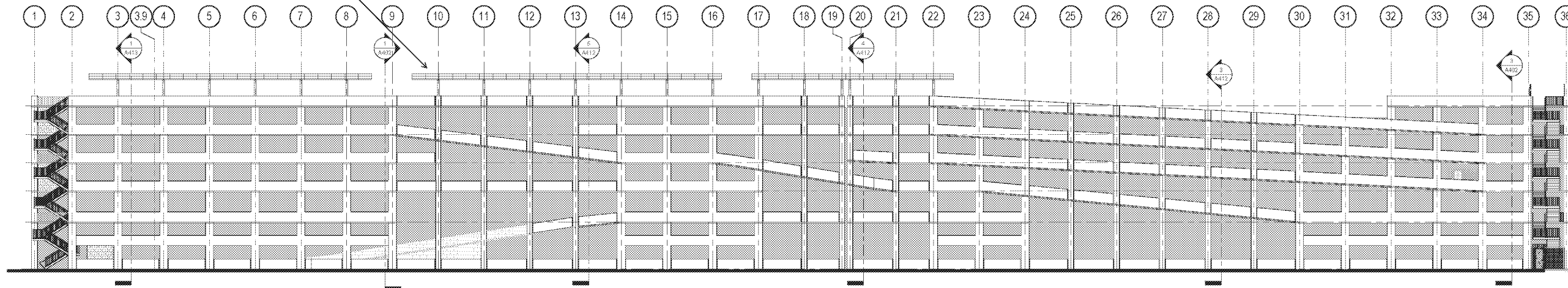
3 SOUTH ELEVATION  
1/16" = 1'-0"

KEY NOTES

1. - GENERAL
  - 1.1 STALL STRIPING - REFER TO DETAIL 6/A901
  - 1.2 ACCESSIBLE STALL STRIPING - REFER TO DETAIL 6 OR 12/A901
  - 1.3 WARNING STRIPING - REFER TO DETAIL 1/A901
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A901
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A901 or 15/A901
  - 1.6 VAN/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 15/A901
  - 1.7 FUEL WARNING SIGN - REFER TO DETAIL 15/A901
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 15/A901
2. - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWGS
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWGS
3. - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A901
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE JOIST/SPAN BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE UPTURN BEAM - REFER TO STRUCTURAL DWGS
  - 3.6 CONCRETE SPANREL - REFER TO STRUCTURAL DWGS
  - 3.7 CONCRETE SHEARWALL - REFER TO STRUCTURAL DWGS
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SINGLE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 26/A901
  - 3.11 CONCRETE CURB/ISLAND 6" HIGH, REFER TO DETAIL 14/A901
  - 3.12 CONCRETE WALL - REFER TO STRUCTURAL DWGS.
4. - MASONRY
  - 4.1 C.M.U. WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWGS
  - 4.3 CMU ELEVATOR SHAFT (2-HR FIRE RATED)
5. - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A901
  - 5.3 GUARDRAIL - REFER TO DETAIL 11 & 12/A901 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A901 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SCREEN PANEL (UNDER DEFERRED SUBMITTAL)
  - 5.7 METAL ENTRY CANOPY (UNDER DEFERRED SUBMITTAL)
  - 5.8 METAL SECURITY SCREEN
  - 5.9 HSS POST, REFER TO STRUCTURAL DRAWINGS
7. - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERPROOFING
  - 7.2 DAMP PROOFING
  - 7.3 ELASTOMERIC COATING OVER ROOM BELOW
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  - 9.1 SMOOTH TROWEL PLASTER FINISH
10. - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTRY/EXIT BARRIER BAR - REFER TO 16/A901
  - 10.2 EXTERIOR SIGNAGE T.B.D. (UNDER DEFERRED SUBMITTAL)
  - 10.3 BIKE RACKS
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A901
  - 10.5 EMERGENCY PHONE, REFER TO ELECTRICAL DRAWINGS
  - 10.6 TIER IDENTIFICATION SIGN - REFER TO DETAIL 19/A901
  - 10.7 CELLING MOUNTED PARKING COUNT SIGN SYSTEM, T.B.D.
  - 10.8 PARKING COUNT TOWER SIGN SYSTEM, T.B.D.
14. - CONVEYING EQUIPMENT
  - 14.1 5500 LBS ELEVATOR SIDE OPENING
21. - FIRE SUPPRESSION
  - 21.1 STANDPIPE - REFER TO FIRE DWGS (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A901
22. - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A901
  - 22.2 ROOF DRAIN AND OVERFLOW - REFER TO 12/A901
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER PIPES W/BENT FLATE - REFER TO DETAIL 9/A901
26. - ELECTRICAL
  - 26.1 POLE MOUNTED EXIT SIGN & LIGHT - REFER TO 20/A901 & ELECTRICAL DRAWINGS
  - 26.2 LIGHT STANDARD - REFER TO DETAIL 3/A901 & ELECTRICAL DRAWINGS
  - 26.3 EV CHARGER J-BOX - REFER TO ELECTRICAL DWGS



PHOTOVOLTAIC PANEL - TYP

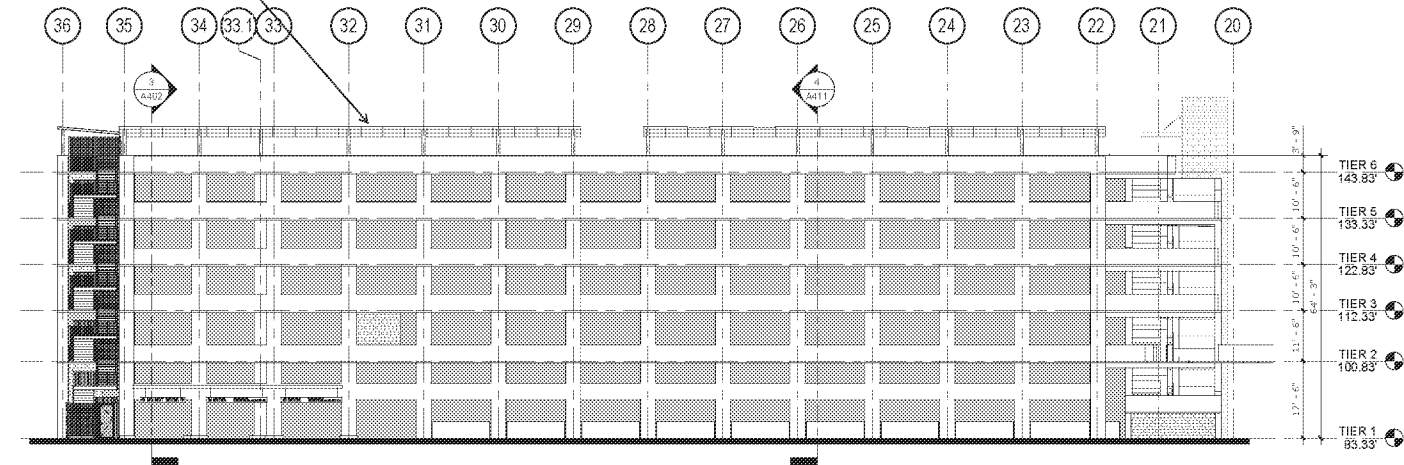


1 WEST ELEVATION  
1/16" = 1'-0"

KEY NOTES

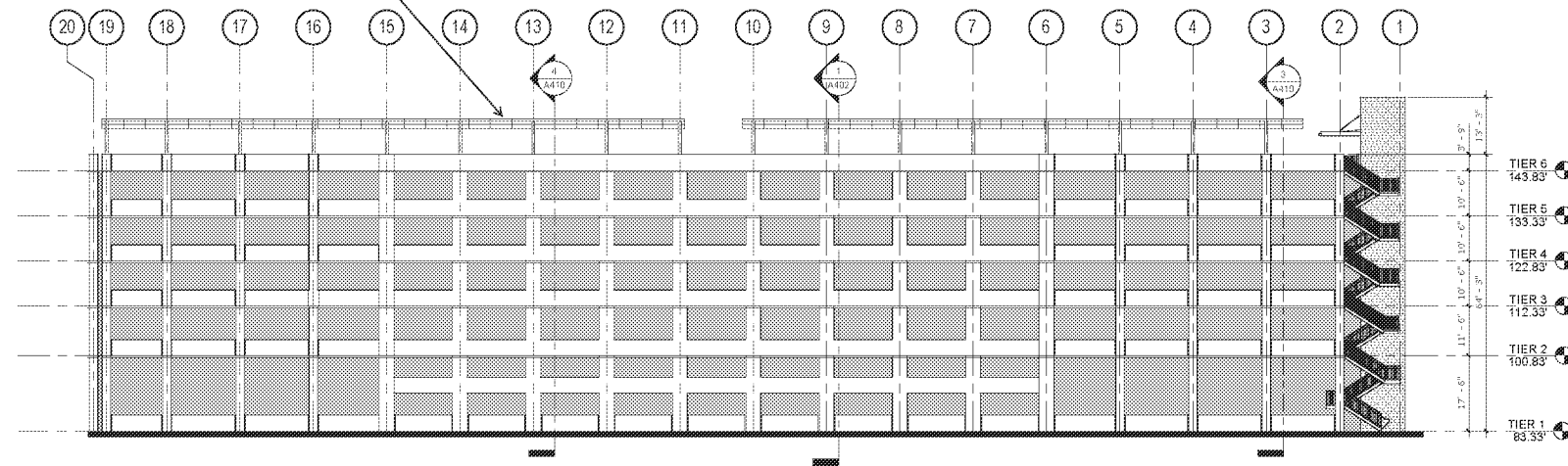
- 1. - GENERAL
  - 1.1 STALL STRIPPING - REFER TO DETAIL 6/A901
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  - 1.3 WARNING STRIPPING - REFER TO DETAIL 1/A901
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A901
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A901 or 15/A901
  - 1.6 VAN/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A901
  - 1.7 FUEL WARNING SIGN - REFER TO DETAIL 13/A901
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 13/A901
- 2. - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWGS
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- 3. - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A901
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  - 3.4 CONCRETE CLANNINGHAM BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE LIFT/JUMP BEAM - REFER TO STRUCTURAL DWGS
  - 3.6 CONCRETE SPANDREL - REFER TO STRUCTURAL DWGS
  - 3.7 CONCRETE SHEARWALL - REFER TO STRUCTURAL DWGS
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 26/A901
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- 4. - MASONRY
  - 4.1 C.M.U. WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWGS
  - 4.3 CMU ELEVATOR SHAFT (2 HR FIRE RATED)
- 5. - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A901
  - 5.3 GUARDRAIL - REFER TO DETAIL 11 & 12/A901 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANYON GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A401 (UNDER DEFERRED SUBMITTAL)
  - 5.5 METAL SCREEN PANEL (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL ENTRY CANYON (UNDER DEFERRED SUBMITTAL)
  - 5.7 METAL SECURITY SCREEN
  - 5.8 METAL SECURITY SCREEN
  - 5.9 HSS POST, REFER TO STRUCTURAL DRAWINGS
- 7. - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERPROOFING
  - 7.2 DAMP PROOFING
  - 7.3 ELASTOMERIC COATING OVER ROOM BELOW
- 8. - DOORS AND WINDOWS
  - 8.1 ALUMINUM CURTAIN WALL SYSTEM W/ 1/4" LAMINATED GLASS
- 9. - FINISHES
  - 9.1 SMOOTH TROWEL PLASTER FINISH
- 10. - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTR/EXIT BARRIER BAR - REFER TO 16/A901
  - 10.2 EXTERIOR SIGNAGE T.S.D. ( UNDER DEFERRED SUBMITTAL )
  - 10.3 BIKE RACKS
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A901
  - 10.5 EMERGENCY PHONE, REFER TO ELECTRICAL DRAWINGS
  - 10.6 TIER IDENTIFICATION SIGN - REFER TO DETAIL 15/A901
  - 10.7 CEILING MOUNTED PARKING COUNT SIGN SYSTEM, T.S.D.
  - 10.8 PARKING COUNT TOWER SIGN SYSTEM, T.S.D.
- 14. - COMMUNICATIONS EQUIPMENT
  - 14.1 3500 LBS ELEVATOR SIDE OPENING
- 21. - FIRE SUPPRESSION
  - 21.1 STANDPIPE - REFER TO FIRE DWGS (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A901
- 22. - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A901
  - 22.2 ROOF DRAIN AND OVERFLOW - REFER TO 12/A901
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER, RISER W/EXIT PLATE - REFER TO DETAIL 9/A901
- 25. - ELECTRICAL
  - 25.1 POLE MOUNTED EXIT SIGN & LIGHT - REFER TO 20/A901 & ELECTRICAL DRAWINGS
  - 25.2 LIGHT STANDINGS - REFER TO DETAIL 3/A901 & ELECTRICAL DRAWINGS
  - 25.3 EV CHARGER J-BOX - REFER TO ELECTRICAL DWGS

PHOTOVOLTAIC PANEL - TYP



2 EAST 1 ELEVATION  
1/16" = 1'-0"

PHOTOVOLTAIC PANEL - TYP



3 EAST 2 ELEVATION  
1/16" = 1'-0"

DISCUSSION DRAFT

INGLEWOOD BASKETBALL & ENTERTAINMENT  
 CENTER PARKING STRUCTURE  
 INGLEWOOD, CALIFORNIA

STAMP:

**PARKING DESIGN SOLUTIONS**  
 ARCHITECTURAL | PLANNING  
 1001 WASHINGTON BLVD, SUITE 200, WESTLAND, CA 90590  
 P: 909.981.3015 F: 909.981.3013 WWW.PDSI.COM

CONTRACTOR:

**BRIDGES CONSTRUCTION COMPANY INC.**  
 CONSULTANT

EXTERIOR BUILDING ELEVATIONS

JOB NO: 2018-046  
 DATE: 05.11.20  
 DRAWN BY: J.C.  
 SCALE: As indicated  
 CHECKED BY: G.R.

A302

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER

BASIC SITE PLAN DRAWINGS

EAST PARKING GARAGE

JUNE 04, 2020



MURPHY'S BOWL, LLC  
OWNER

WILSON MEANY  
DEVELOPER'S MANAGING AGENT

LEGENDS  
OWNER'S REPRESENTATIVE

AECOM  
ARCHITECTURE / ELECTRICAL / PLUMBING / FAÇADE DESIGN / HIGH PERFORMANCE BUILDING / ENHANCED COMMISSIONING / GEOTECH / TRANSPORTATION

WALTER P. MOORE  
STRUCTURAL

HENDERSON ENGINEERS  
MECHANICAL / FIRE PROTECTION

D & D ENGINEERING, INC.  
CIVIL WET UTILITIES

ANDERSON BARKER ARCHITECTS  
ARCHITECTURE

HOOD DESIGN STUDIO  
URBAN PLANNING / LANDSCAPE DESIGN

WRIGHTSON, JOHNSON, HADDON & WILLIAMS, INC.  
ACOUSTICS / AV / BROADCAST / DATA / DAS / SECURITY / SOUND / TELE / WIFI

B. J. PALMER & ASSOCIATES, INC.  
CIVIL DRY UTILITIES

DOWNSTREAM  
ENVIRONMENTAL GRAPHICS

FP&C CONSULTANTS, INC.  
CODES / LIFE SAFETY

HORTON LEES BROGDEN  
SPECIALTY LIGHTING

LEE HERZOG FAÇADE ACCESS CONSULTING  
FAÇADE ACCESS

LERCH BATES  
VERTICAL TRANSPORTATION

S2O CONSULTANTS  
FOOD SERVICE

WALKER CONSULTANTS  
PARKING DESIGN

CITY DESIGN STUDIO  
ARCHITECTURE

**REGISTRATION**

**REGISTRATION**

These Design Development drawings represent the current status of the design process and have been issued for Consultants coordination. Owner review and approval, and for obtaining estimates of available construction cost. They do not describe the complete and final design or scope of work required for construction of the project and do not, under any circumstances, intended to be used by a CM or other Contractor, or any other person for construction, for preparation of shop drawings or other submittals or for bidding or awarding subcontracts.

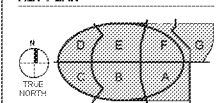
**DISCUSSION DRAFT**

**50% DESIGN DEVELOPMENT**

**ISSUE / REVISION**

NO.	DATE	DESCRIPTION

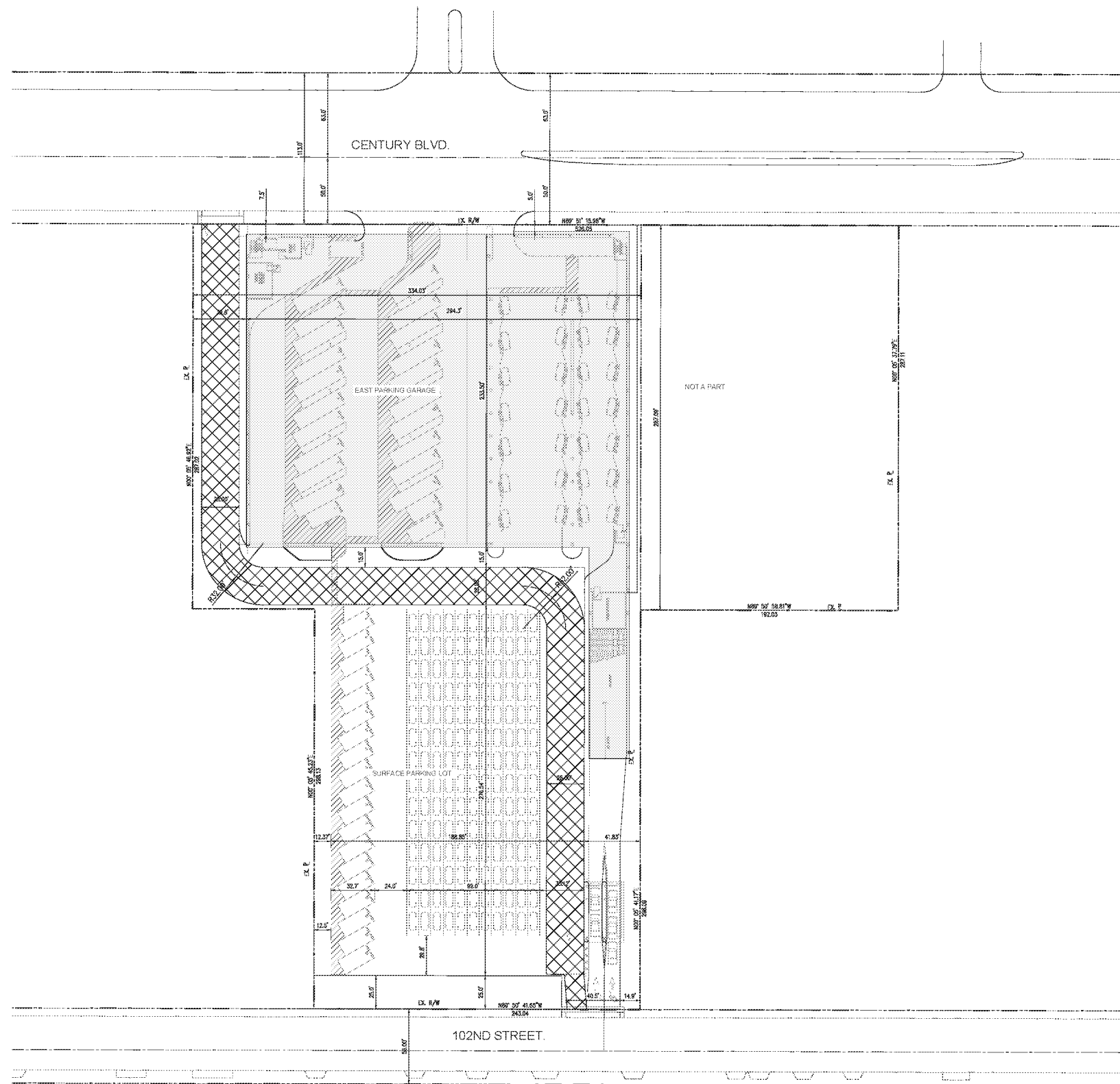
**KEY PLAN**



**PROJECT NUMBER**

**SHEET TITLE**  
HORIZONTAL CONTROL PLAN  
EAST PARKING STRUCTURE  
**SHEET NUMBER**

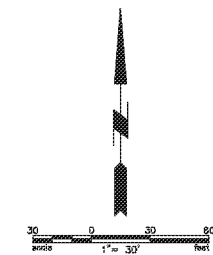
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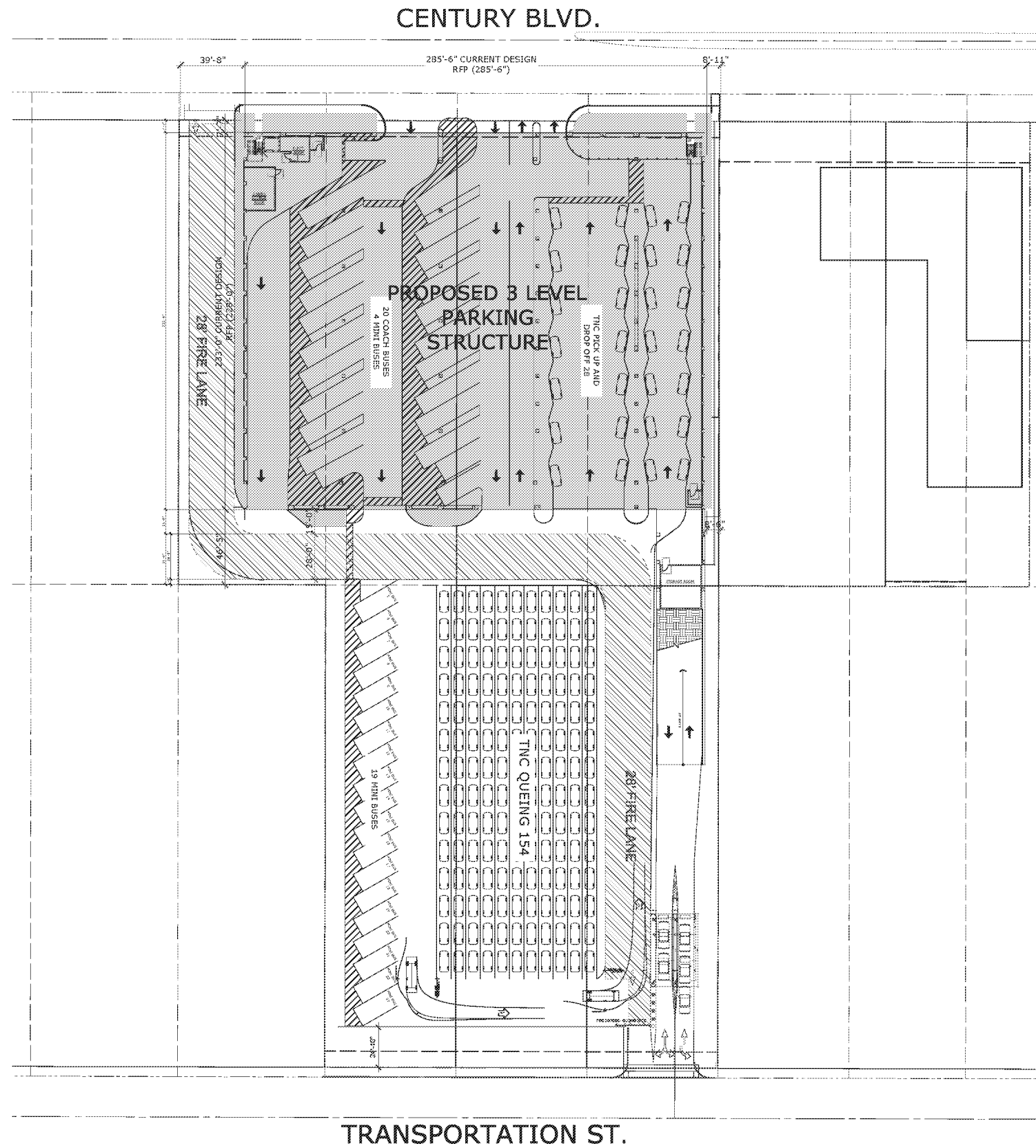


**LEGEND**

- RIGHT OF WAY
- CENTERLINE
- PROPOSED FENCE
- PROPOSED WALL
- PROPOSED FIRE ACCESS AND UTILITIES EASEMENT

**EAST PARKING STRUCTURE**

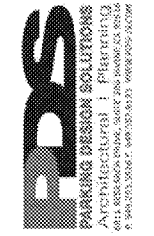




SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED

OVERALL SITE PLAN

1:40



DISCUSSION DRAFT

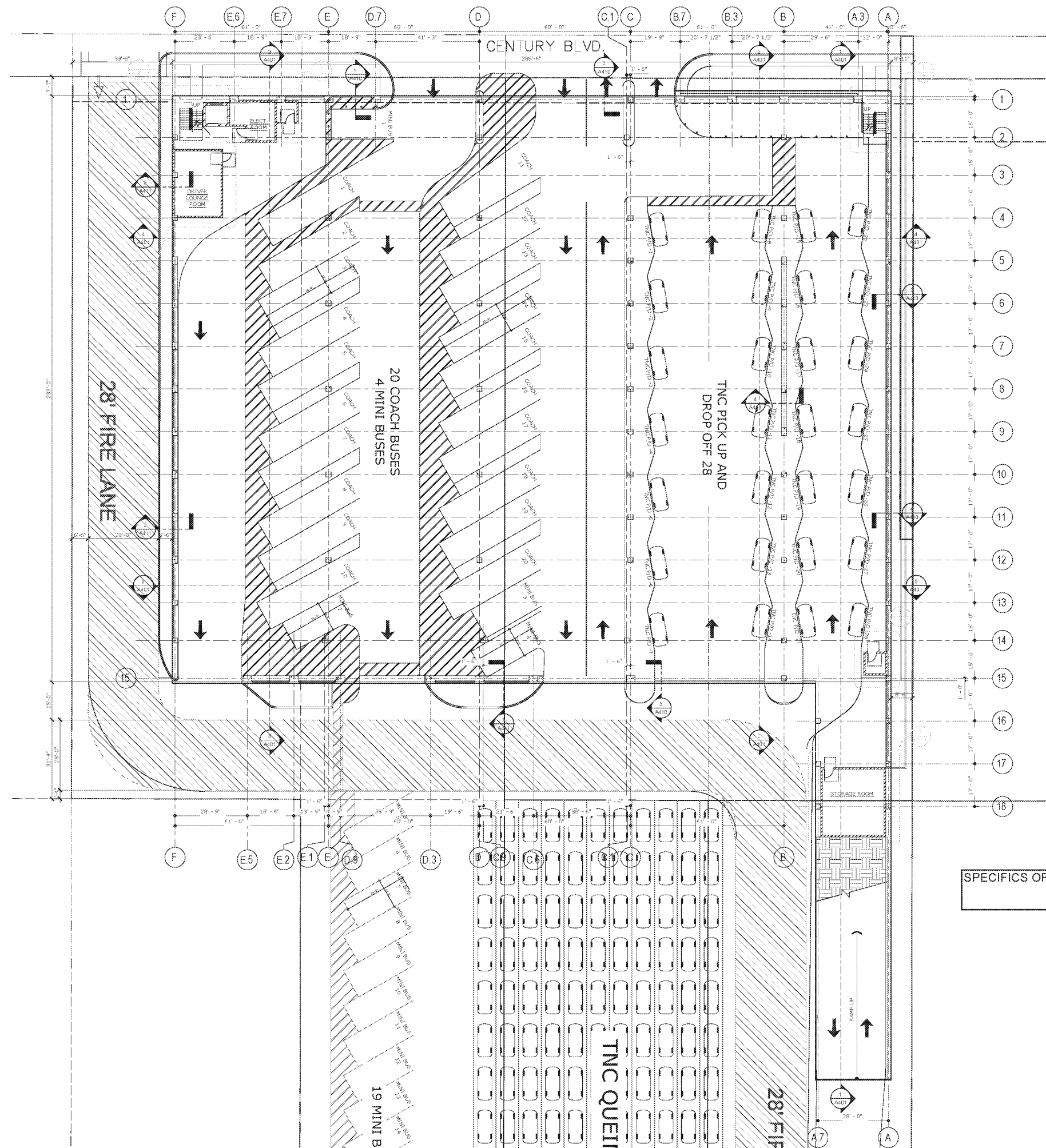
INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE  
INGLEWOOD, CALIFORNIA

OVERALL SITE PLAN

JOB NO. 090-047  
DATE: 04.02.20  
DRAWN BY: JEC  
SCALE: As Noted  
CHECKED BY: OR

A101

DATE PLOTTED: 04/02/20 10:00:00 AM. PLOT BY: JEC. PLOT SCALE: 1/8"=1'-0". PLOT SHEET: A101. PLOT TOTAL SHEETS: 10. PLOT JOB NO.: 090-047. PLOT PROJECT NAME: INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE. PLOT SHEET TITLE: OVERALL SITE PLAN.



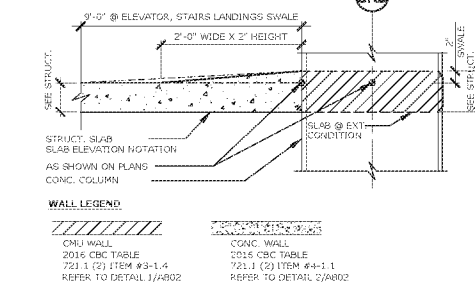
**KEY NOTES**

- 1. - GENERAL
  - 1.1. STALL STRIPING - REFER TO DETAIL 6/A801
  - 1.2. ACCESSIBLE STALL STRIPING - REFER TO DETAIL B OR 12/A801
  - 1.3. WARNING STRIPING - REFER TO DETAIL 1/A801
  - 1.4. DIRECTION ARROWS - REFER TO DETAIL 5/A801
  - 1.5. ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A801
  - 1.6. VAN/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A801
  - 1.7. FUEL WARNING SIGN - REFER TO DETAIL 15/A801
  - 1.8. ACCESSIBLE WARNING SIGN - REFER TO DETAIL 16/A801
  - 1.9. COMPACT STALL STRIPING - REFER TO DETAIL 6/A801
- 2. - SITE CONSTRUCTION
  - 2.1. LANDSCAPE - REFER TO LANDSCAPE DWG'S
  - 2.2. SIDEWALK - REFER TO CIVIL - LANDSCAPE DWG'S
- 3. - CONCRETE
  - 3.1. CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A801
  - 3.2. CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3. CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4. CONCRETE CLANNINGHAM BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5. CONCRETE LIFTUP BEAM - REFER TO STRUCTURAL DWG'S
  - 3.6. CONCRETE SPANREL - REFER TO STRUCTURAL DWG'S
  - 3.7. SHOTCRETE RETAINING WALL - REFER TO STRUCTURAL DWG'S
  - 3.8. ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9. LINE OF CONCRETE SWALE
  - 3.10. CONCRETE REVEAL - REFER TO DETAIL 28/A801
  - 3.11. CONCRETE CURB/STAIR 4" HIGH - REFER TO DETAIL 14/A801
  - 3.12. CONCRETE DOWNTURN BEAM - REFER TO STRUCTURAL DWG'S
  - 3.13. COLORED CONCRETE TOPPING SLAB
  - 3.14. CONCRETE WALL - REFER TO STRUCTURAL DRAWINGS
- 4. - MASONRY
  - 4.1. C.M.U. WALL
  - 4.2. CMU RETAINING WALL - REFER TO STRUCT. DWGS
  - 4.3. CMU ELEVATOR SHAFT (2 HR FIRE RATED) - REFER TO DET. 1/A802
- 5. - METALS
  - 5.1. METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2. METAL PIPE RIGGLARD, CONCRETE FILLED - REFER TO DETAIL 4/A801
  - 5.3. GUARDRAIL - REFER TO DETAIL 11 & 12/A801 (UNDER DEFERRED SUBMITTAL)
  - 5.4. ELEVATOR CANOPY - REFER TO DET. 17/A801
  - 5.5. GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A402 (UNDER DEFERRED SUBMITTAL)
  - 5.6. METAL SECURITY SCREEN
  - 5.7. NOT USED
  - 5.8. METAL GRATE
  - 5.9. LOUVER
  - 5.10. TUBE STEEL - REFER TO STRUCTURAL DRAWINGS
- 7. - THERMAL AND MOISTURE PROTECTION
  - 7.1. WATERPROOFING - REFER TO DET. 1/A802
  - 7.2. DAMP PROOFING
  - 7.3. ELASTOMERIC COATING OVER ROOM BELOW
- 10. - SPECIALTIES
  - 10.1. OVERHEAD VEHICLE ENTRY/EXIT BARRIER BAR - REFER TO 16/A801
  - 10.2. PARKING CONTROL EQUIPMENT
  - 10.3. BIKE RACKS - REFER TO DET. 6 & 7/A802
  - 10.4. DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A801
  - 10.5. DELINEATORS
  - 10.6. EXPANSION COVER PLATE - REFER TO DET. 5/A802
  - 10.7. PAW OR FOOT STAIR
  - 10.8. COMPRESSION JOINT - REFER TO DET. 20/A801
  - 10.9. REDUCED CLEARANCE BAR - REFER TO DET. 15/A801
  - 10.10. FACADE - UNDER SEPARATE PERMIT
  - 10.11. METAL SHOT SHAFT W/ PLASTER FINISH
- 14. - CONVEYING EQUIPMENT
  - 14.1. 3500 LBS & 4000 LBS ELEVATOR SIDE OPENING
- 21. - FIRE SUPPRESSION
  - 21.1. FIRE SPRINKLER RISER / STANDPIPE - REFER TO FIRE DWGS (UNDER DEFERRED SUBMITTAL)
  - 21.2. FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A801
- 22. - PLUMBING
  - 22.1. FLOOR DRAIN - REFER TO 11/A801
  - 22.2. ROOF DRAIN AND OVERFLOW / SILENS - REFER TO 12/A801
  - 22.3. TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4. PLUMBING RISER PIPES W/BENT PLATE - REFER TO DETAIL 9/A801
  - 22.5. 3/4" W.P. RISER FIT - REFER TO PLUMBING DRAWINGS
- 26. - ELECTRICAL
  - 26.1. POLE MOUNTED EXIT SIGN & LIGHT - REFER TO 17/A802 & ELECTRICAL DRAWINGS
  - 26.2. EXIT SIGNS - REFER TO ELECTRICAL DWG'S
  - 26.3. LIGHT STANDARD - REFER TO DETAIL 5/A801 & ELECTRICAL DRAWINGS
  - 26.4. ELECTRIC VEHICLE CHARGER - REFER TO ELECTRICAL DWG'S
  - 26.5. EV CHARGER HOOK - REFER TO ELECTRICAL DWG'S
  - 26.6. EMERGENCY PHONE, REFER TO ELECTRICAL DWG'S
  - 26.7. LIGHT - REFER TO ELECTRICAL DRAWINGS

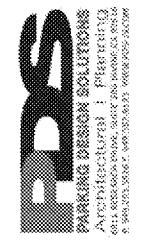
DISCUSSION DRAFT

**NOTES**

- 1. MAX SLOPE OF 1.05 % AT ANY DIRECTION AT ALL ACCESSIBLE STALLS, ELEVATOR, STAIRS LANDINGS
- 2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.05%) IN ANY DIRECTION
- 3. CONTRACTOR TO VERIFY AND CONFIRM THAT 6"-2" CLEAR IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
- 4. ALL VERTICAL PIPE EXPOSED TO VEHICULAR IMPACT TO BE PROTECTED PER DET. 5/A801
- 5. ALL METALS NEED TO BE PRIME AND PAINTED
- 6. ROTARY FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS.
- 7. MEDIUM BROOM FINISHED @ ELEVATOR LOBBIES AND @ ALL ROOMS.
- 8. REFER TO SHEET A220 & A221 FOR SLAB ELEVATIONS



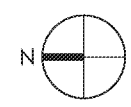
SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED



**INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE**  
 INGLEWOOD, CALIFORNIA

**TIER P1 FLOOR PLAN**

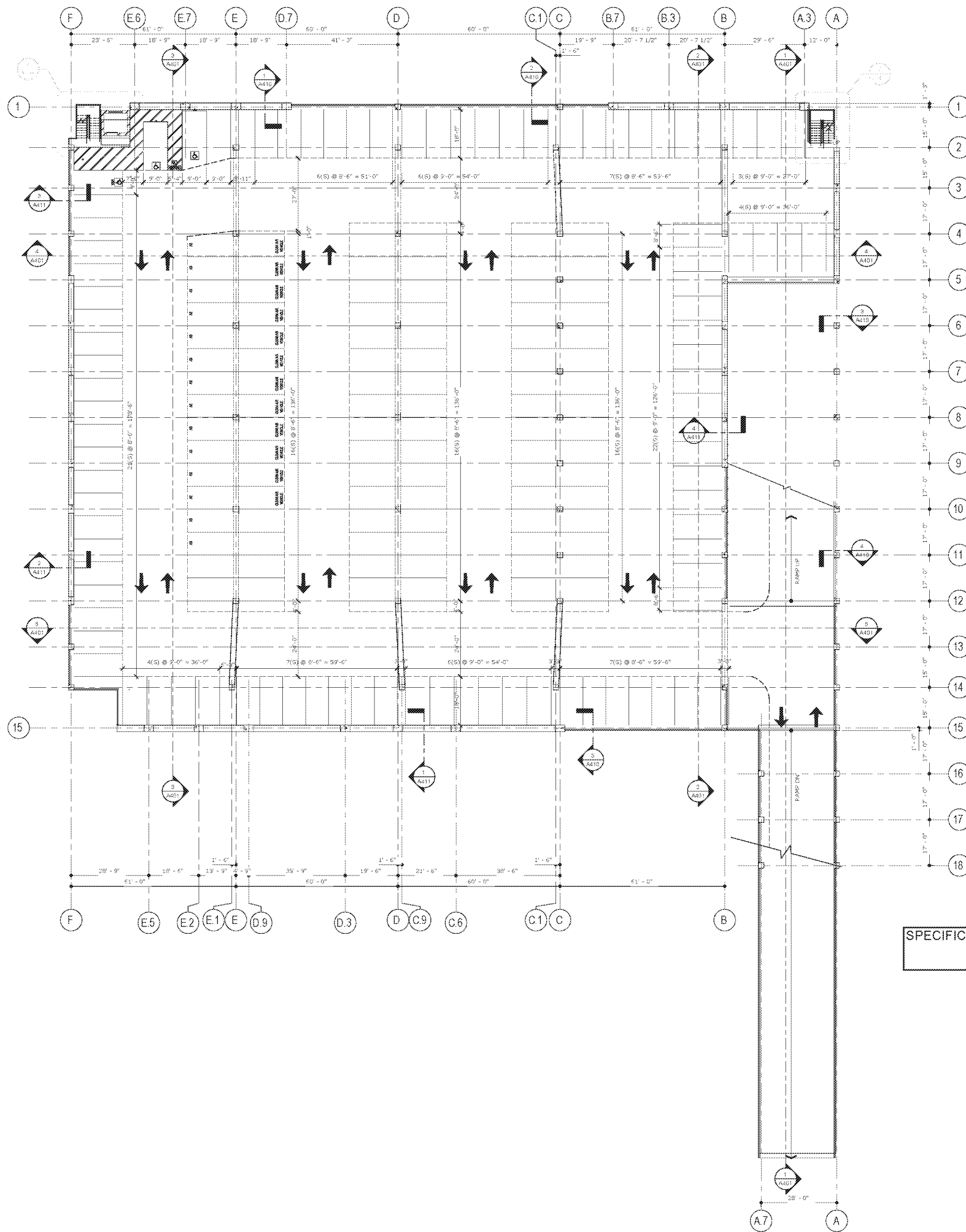
1/16" = 1'-0"



**TIER P1 FLOOR PLAN**

JOB NO. 009-047  
 DATE: 03.27.20  
 DRAWN BY: JEC  
 SCALE: As Noted  
 CHECKED BY: OR

**A201**

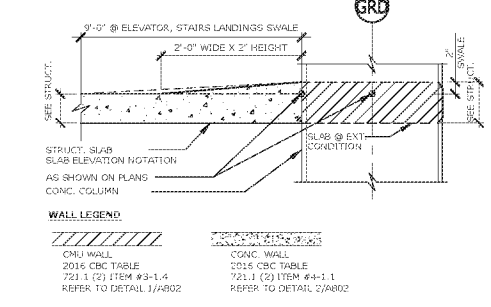


**KEY NOTES**

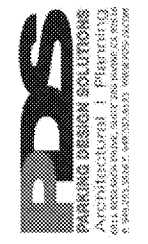
- 1 - GENERAL
  - 1.1 STALL STRIPING - REFER TO DETAIL 6/A801
  - 1.2 ACCESSIBLE STALL STRIPING - REFER TO DETAIL B OR 12/A801
  - 1.3 WARNING STRIPING - REFER TO DETAIL 1/A801
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A801
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A801
  - 1.6 UNACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A801
  - 1.7 FUEL WARNING SIGN - REFER TO DETAIL 15/A801
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 16/A801
  - 1.9 COMPACT STALL STRIPING - REFER TO DETAIL 6/A801
- 2 - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWG'S
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWG'S
- 3 - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A801
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE CLANNINGHAM BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE LIFTUP BEAM - REFER TO STRUCTURAL DWG'S
  - 3.6 CONCRETE SPANREL - REFER TO STRUCTURAL DWG'S
  - 3.7 SHOTCRETE RETAINING WALL - REFER TO STRUCTURAL DWG'S
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 28/A801
  - 3.11 CONCRETE CURB/ISLAND 4" HIGH - REFER TO DETAIL 14/A801
  - 3.12 CONCRETE DOWNTURN BEAM - REFER TO STRUCTURAL DWG'S
  - 3.13 COLORED CONCRETE TOPPING SLAB
  - 3.14 CONCRETE WALL - REFER TO STRUCTURAL DRAWINGS
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  - 4.1 C.M.U. WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWGS
  - 4.3 CMU ELEVATOR SHAFT (2 HR FIRE RATED) - REFER TO DET. 1/A802
- 5 - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A801
  - 5.3 GUARDRAIL - REFER TO DETAIL 11 & 12/A802 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY - REFER TO DET. 17/A802
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A402 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SECURITY SCREEN
  - 5.7 NOT USED
  - 5.8 METAL GRATE
  - 5.9 LOUVER
  - 5.10 TUBE STEEL - REFER TO STRUCTURAL DRAWINGS
- 7 - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERPROOFING - REFER TO DET. 11/A802
  - 7.2 DAMP PROOFING
  - 7.3 ELASTOMERIC COATING OVER ROOM BELOW
- 10 - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTRY/EXIT BARRIER BAR - REFER TO 16/A801
  - 10.2 PARKING CONTROL EQUIPMENT
  - 10.3 BIKE RACKS - REFER TO DET. 6 & 7/A802
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A801
  - 10.5 DELINEATORS
  - 10.6 EXPANSION COVER PLATE - REFER TO DET. 5/A802
  - 10.7 PAV. ON FOOT STATION
  - 10.8 COMPRESSION JOINT - REFER TO DET. 20/A801
  - 10.9 REDUCED CLEARANCE BAR - REFER TO DET. 15/A801
  - 10.10 FACADE - UNDER SEPARATE PERMIT
  - 10.11 METAL SHAFT W/ PLASTER FINISH
- 14 - CONVEYING EQUIPMENT
  - 14.1 3500 LBS & 4000 LBS ELEVATOR SIDE OPENING
- 21 - FIRE SUPPRESSION
  - 21.1 FIRE SPRINKLER RISER / STANDPIPE - REFER TO FIRE DWGS (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A801
- 22 - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A801
  - 22.2 ROOF DRAIN AND OVERFLOW / RISERS - REFER TO 12/A801
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER PIPES W/BENT PLATE - REFER TO DETAIL 9/A801
  - 22.5 3/4" W.P. RISER PIPES - REFER TO PLUMBING DRAWINGS
- 26 - ELECTRICAL
  - 26.1 POLE MOUNTED EXIT SIGN & LIGHT - REFER TO 17/A802 & ELECTRICAL DRAWINGS
  - 26.2 EXIT SIGNS - REFER TO ELECTRICAL DWG'S
  - 26.3 LIGHT STANDARD - REFER TO DETAIL 5/A801 & ELECTRICAL DRAWINGS
  - 26.4 ELECTRIC VEHICLE CHARGER - REFER TO ELECTRICAL DWG'S
  - 26.5 EV CHARGER HATCH - REFER TO ELECTRICAL DWG'S
  - 26.6 EMERGENCY PHONE, REFER TO ELECTRICAL DWG'S
  - 26.7 LIGHT - REFER TO ELECTRICAL DRAWINGS

**NOTES**

- 1. MAX SLOPE OF 1.05% AT ANY DIRECTION AT ALL ACCESSIBLE STALLS, ELEVATOR, STAIRS LANDINGS
- 2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.05%) IN ANY DIRECTION
- 3. CONTRACTOR TO VERIFY AND CONFIRM THAT 8'-2" CLEAR IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
- 4. ALL VERTICAL PIPE EXPOSED TO VEHICULAR IMPACT TO BE PROTECTED PER DET. 5/A801
- 5. ALL METALS NEED TO BE PRIME AND PAINTED
- 6. ROTARY FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS.
- 7. MEDIUM BROOM FINISHED @ ELEVATOR LOBBIES AND @ ALL ROOMS.
- 8. REFER TO SHEET A220 & A221 FOR SLAB ELEVATIONS



SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED



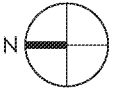
**INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE**  
INGLEWOOD, CALIFORNIA

**TIER P2 FLOOR PLAN**

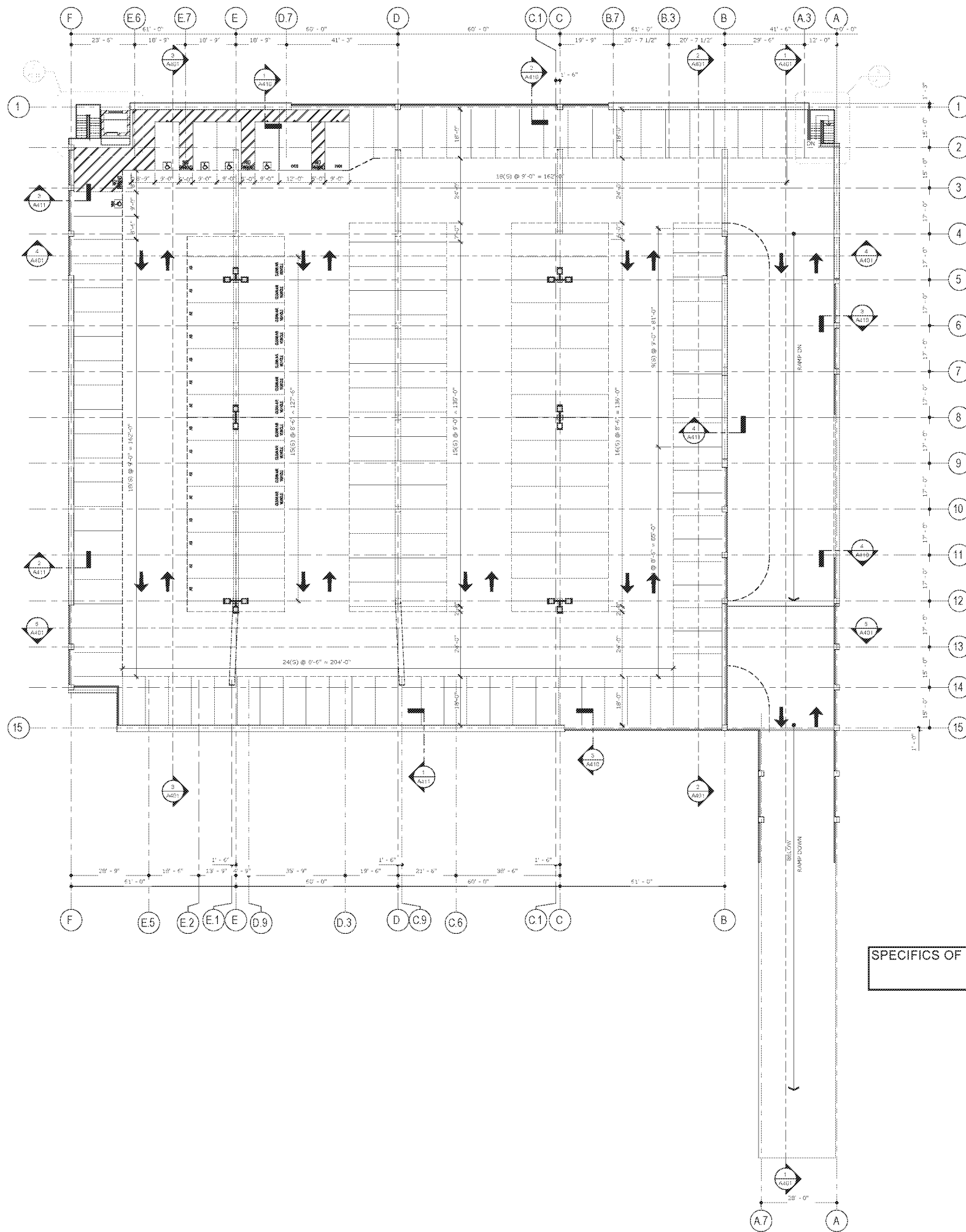
JOB NO. 009-047  
DATE: 03.27.20  
DRAWN BY: JEC  
SCALE: As Noted  
CHECKED BY: OR

**TIER P2 FLOOR PLAN**

1/16" = 1'-0"



**A202**

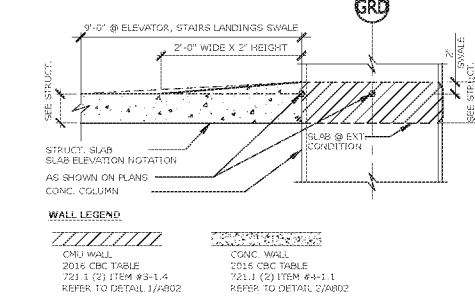


**KEY NOTES**

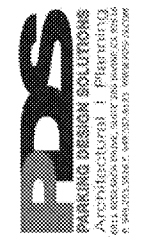
- 1 - GENERAL
  - 1.1 STALL STRIPING - REFER TO DETAIL 6/A801
  - 1.2 ACCESSIBLE STALL STRIPING - REFER TO DETAIL B OR 12/A801
  - 1.3 WARNING STRIPING - REFER TO DETAIL 1/A801
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A801
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A801
  - 1.6 UNACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A801
  - 1.7 FUEL WARNING SIGN - REFER TO DETAIL 15/A801
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 16/A801
  - 1.9 COMPACT STALL STRIPING - REFER TO DETAIL 6/A801
- 2 - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWG'S
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWG'S
- 3 - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A801
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE CLANNINGHAM BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE LIFTUP BEAM - REFER TO STRUCTURAL DWG'S
  - 3.6 CONCRETE SPANREL - REFER TO STRUCTURAL DWG'S
  - 3.7 SHOTCRETE RETAINING WALL - REFER TO STRUCTURAL DWG'S
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 28/A801
  - 3.11 CONCRETE CURB/ISLAND 4" HIGH - REFER TO DETAIL 14/A801
  - 3.12 CONCRETE DOWNTURN BEAM - REFER TO STRUCTURAL DWG'S
  - 3.13 COLORED CONCRETE TOPPING SLAB
  - 3.14 CONCRETE WALL - REFER TO STRUCTURAL DRAWINGS
- 4 - MASONRY
  - 4.1 C.M.U. WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWGS
  - 4.3 CMU ELEVATOR SHAFT (2 HR FIRE RATED) - REFER TO DET. 1/A802
- 5 - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A801
  - 5.3 GUARDRAIL - REFER TO DETAIL 11 & 12/A802 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY - REFER TO DET. 17/A802
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET A402 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SECURITY SCREEN
  - 5.7 NOT USED
  - 5.8 METAL GRATE
  - 5.9 LOUVER
  - 5.10 TUBE STEEL - REFER TO STRUCTURAL DRAWINGS
- 7 - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERPROOFING - REFER TO DET. 1/A802
  - 7.2 DAMP PROOFING
  - 7.3 ELASTOMERIC COATING OVER ROOM BELOW
- 10 - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTRY/EXIT BARRIER BAR - REFER TO 16/A801
  - 10.2 PARKING CONTROL EQUIPMENT
  - 10.3 BIKE RACKS - REFER TO DET. 6 & 7/A802
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 7/A801
  - 10.5 DELINEATORS
  - 10.6 EXPANSION COVER PLATE - REFER TO DET. 5/A802
  - 10.7 PAINT ON FOOT STATION
  - 10.8 COMPRESSION JOINT - REFER TO DET. 20/A801
  - 10.9 REDUCED CLEARANCE BAR - REFER TO DET. 15/A801
  - 10.10 FACADE - UNDER SEPARATE PERMIT
  - 10.11 METAL SHUTTER SHAFT W/ PLASTER FINISH
- 14 - CONVEYING EQUIPMENT
  - 14.1 3500 LBS & 4000 LBS ELEVATOR SIDE OPENING
- 21 - FIRE SUPPRESSION
  - 21.1 FIRE SPRINKLER RISER / STANDPIPE - REFER TO FIRE DWGS (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A801
- 22 - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A801
  - 22.2 ROOF DRAIN AND OVERFLOW / SILENS - REFER TO 12/A801
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER PIPES W/BENT PLATE - REFER TO DETAIL 9/A801
  - 22.5 RAMP PLUMBER PIT - REFER TO PLUMBING DRAWINGS
- 26 - ELECTRICAL
  - 26.1 POLE MOUNTED EXIT SIGN & LIGHT - REFER TO 17/A802 & ELECTRICAL DRAWINGS
  - 26.2 EXIT SIGNS - REFER TO ELECTRICAL DWG'S
  - 26.3 LIGHT STANDARD - REFER TO DETAIL 5/A801 & ELECTRICAL DRAWINGS
  - 26.4 ELECTRIC VEHICLE CHARGER - REFER TO ELECTRICAL DWG'S
  - 26.5 EV CHARGER HATCH - REFER TO ELECTRICAL DWG'S
  - 26.6 EMERGENCY PHONE, REFER TO ELECTRICAL DWG'S
  - 26.7 LIGHT - REFER TO ELECTRICAL DRAWINGS

**NOTES**

- 1. MAX SLOPE OF 1.05% AT ANY DIRECTION AT ALL ACCESSIBLE STALLS, ELEVATOR, STAIRS LANDINGS
- 2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.05%) IN ANY DIRECTION
- 3. CONTRACTOR TO VERIFY AND CONFIRM THAT 8'-2" CLEAR IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
- 4. ALL METALS PIPE EXPOSED TO VEHICULAR IMPACT TO BE PROTECTED PER DET. 5/A801
- 5. ALL METALS NEED TO BE PRIME AND PAINTED
- 6. ROTARY FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS.
- 7. MEDIUM BROOM FINISHED @ ELEVATOR LOBBIES AND @ ALL ROOMS.
- 8. REFER TO SHEET A220 & A221 FOR SLAB ELEVATIONS



SPECIFICS OF PARKING STALL PLAN IS IN PROCESS AND MAY BE ADJUSTED

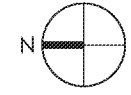


DISCUSSION DRAFT

**INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE**  
 INGLEWOOD, CALIFORNIA

TIER P3 FLOOR PLAN

1/16" = 1'-0"



TIER P3 FLOOR PLAN

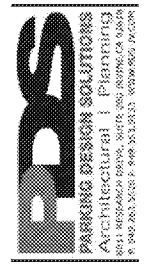
JOB NO. 009-047  
 DATE: 03.27.20  
 DRAWN BY: JEC  
 SCALE: As Noted  
 CHECKED BY: OR

**A203**

PROGRESS SET 5/11

KEY NOTES

- 1. - GENERAL
  - 1.1 STALL STRIPINGS - REFER TO DETAIL 6/A901
  - 1.2 ACCESSIBLE STALL STRIPINGS - REFER TO DETAIL 8 OR 12/A901
  - 1.3 WARNING STRIPINGS - REFER TO DETAIL 1/A901
  - 1.4 DIRECTION ARROWS - REFER TO DETAIL 5/A901
  - 1.5 ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 11/A901 OR 15/A901
  - 1.6 VAW/ACCESSIBLE SIGN POLE MOUNT - REFER TO DETAIL 10/A901
  - 1.7 FUEL WARNING SIGN - REFER TO DETAIL 13/A901
  - 1.8 ACCESSIBLE WARNING SIGN - REFER TO DETAIL 13/A901
- 2. - SITE CONSTRUCTION
  - 2.1 LANDSCAPE - REFER TO LANDSCAPE DWG'S
  - 2.2 SIDEWALK - REFER TO CIVIL - LANDSCAPE DWG'S
- 3. - CONCRETE
  - 3.1 CONCRETE COLUMN W/ 3/4" CHAMFER - REFER TO DETAIL 1/A801
  - 3.2 CONCRETE SLAB ON GRADE - REFER TO STRUCTURAL DRAWINGS
  - 3.3 CONCRETE TRANSFER GIRDER - REFER TO STRUCTURAL DRAWINGS
  - 3.4 CONCRETE CLUNGINGHAM BEAM - REFER TO STRUCTURAL DRAWINGS
  - 3.5 CONCRETE RETURN BEAM - REFER TO STRUCTURAL DWG'S
  - 3.6 CONCRETE SPANDREL - REFER TO STRUCTURAL DWG'S
  - 3.7 CONCRETE SHEARWALL - REFER TO STRUCTURAL DWG'S
  - 3.8 ELEVATED CONCRETE SLAB - REFER TO STRUCTURAL DRAWINGS
  - 3.9 LINE OF CONCRETE SWALE
  - 3.10 CONCRETE REVEAL - REFER TO DETAIL 26/A901
  - 3.11 CONCRETE CURB/BLAND 6" HIGH - REFER TO DETAIL 14/A901
  - 3.12 CONCRETE WALL - REFER TO STRUCTURAL DWG'S
- 4. - MASONRY
  - 4.1 CMU WALL
  - 4.2 CMU RETAINING WALL - REFER TO STRUCT. DWG'S
  - 4.3 CMU ELEVATOR SHAFT (2 HR FIRE RATED)
- 5. - METALS
  - 5.1 METAL PAN STAIR, CONCRETE FILLED (UNDER DEFERRED SUBMITTAL)
  - 5.2 METAL PIPE BOLLARD, CONCRETE FILLED - REFER TO DETAIL 4/A901
  - 5.3 GUARDRAIL - REFER TO DETAIL 11 & 12/A902 (UNDER DEFERRED SUBMITTAL)
  - 5.4 ELEVATOR CANOPY
  - 5.5 GALVANIZED BARRIER CABLES - REFER TO DETAILS ON SHEET 4401 (UNDER DEFERRED SUBMITTAL)
  - 5.6 METAL SCREEN PANEL (UNDER DEFERRED SUBMITTAL)
  - 5.7 METAL ENTRY CANOPY (UNDER DEFERRED SUBMITTAL)
  - 5.8 METAL SECURITY SCREEN
  - 5.9 HSS POST, REFER TO STRUCTURAL DRAWINGS
- 7. - THERMAL AND MOISTURE PROTECTION
  - 7.1 WATERROOFING
  - 7.2 DAMP PROOFING
  - 7.3 ELASTOMERIC COATING OVER ROOM BELOW
- 8. - DOORS AND WINDOWS
  - 8.1 ALUMINUM CURTAIN WALL SYSTEM W/ 1/4" LAMINATED GLASS
- 9. - FINISHES
  - 9.1 SMOOTH TROWEL PLASTER FINISH
- 10. - SPECIALTIES
  - 10.1 OVERHEAD VEHICLE ENTRY/EXIT BARRIER BAR - REFER TO 16/A901
  - 10.2 EXTERIOR SIGNAGE T.B.D. ( UNDER DEFERRED SUBMITTAL )
  - 10.3 BIKE RACKS
  - 10.4 DETECTABLE WARNING STRIP - REFER TO DETAIL 3/A901
  - 10.5 EMERGENCY PHONE, REFER TO ELECTRICAL DRAWINGS
  - 10.6 TIER IDENTIFICATION SIGN - REFER TO DETAIL 19/A901
  - 10.7 CEILING MOUNTED PARKING COUNT SIGN SYSTEM T.B.D.
  - 10.8 PARKING COUNT TOWER SIGN SYSTEM T.B.D.
- 14. - COMMUNITY EQUIPMENT
  - 14.1 3500 LBS ELEVATOR SIDE OPENING
- 21. - FIRE SUPPRESSION
  - 21.1 STANDPIPE - REFER TO FIRE DWG'S (UNDER DEFERRED SUBMITTAL)
  - 21.2 FIRE EXTINGUISHER CABINET - REFER TO DETAIL 14/A901
- 22. - PLUMBING
  - 22.1 FLOOR DRAIN - REFER TO 11/A901
  - 22.2 RACK DRAIN AND COVER/DW - REFER TO 12/A901
  - 22.3 TRENCH DRAIN - REFER TO PLUMBING DRAWINGS
  - 22.4 PLUMBING RISER PIPES W/BENT PLATE - REFER TO DETAIL 9/A901
- 26. - ELECTRICAL
  - 26.1 POLE MOUNTED EXIT SIGN & LIGHT - REFER TO 20/A902 & ELECTRICAL DRAWINGS
  - 26.2 LIGHT STANDARD - REFER TO DETAIL 3/A901 & ELECTRICAL DRAWINGS
  - 26.3 EV CHARGES 1-BOX - REFER TO ELECTRICAL DWG'S



CONTRACTOR:

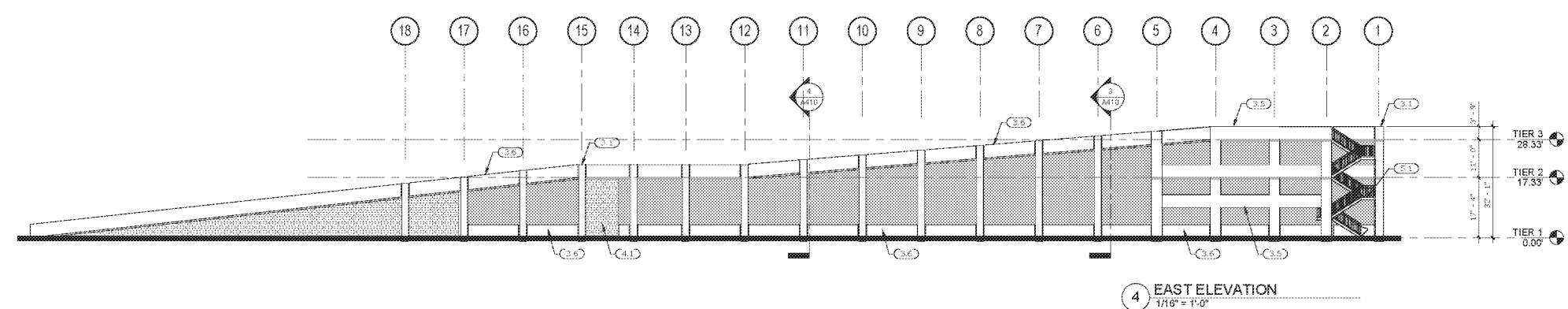
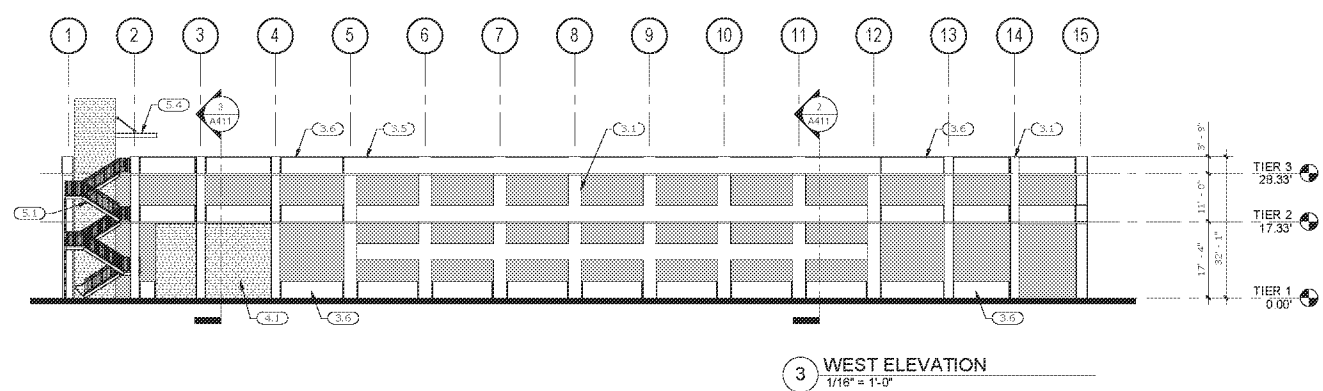
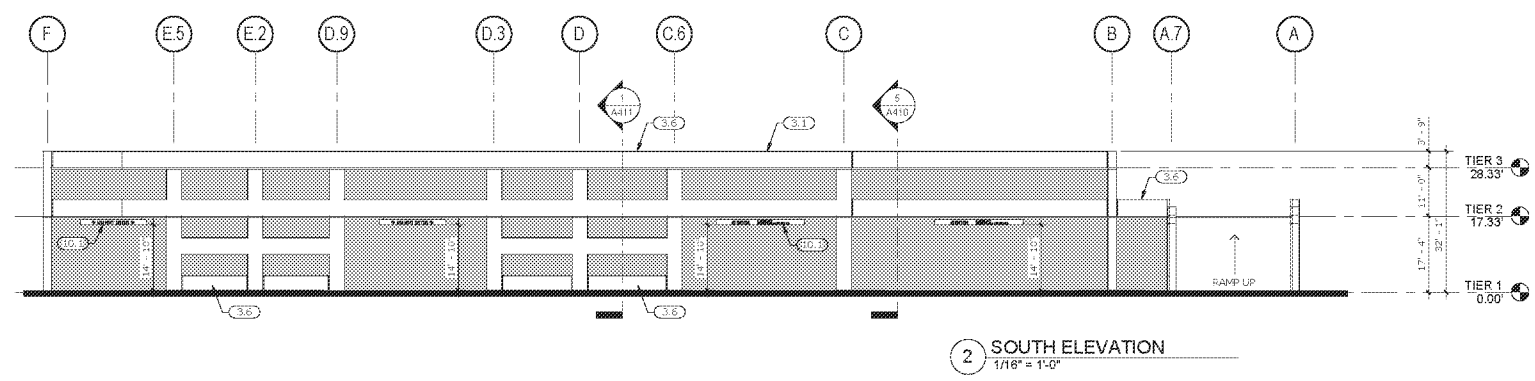
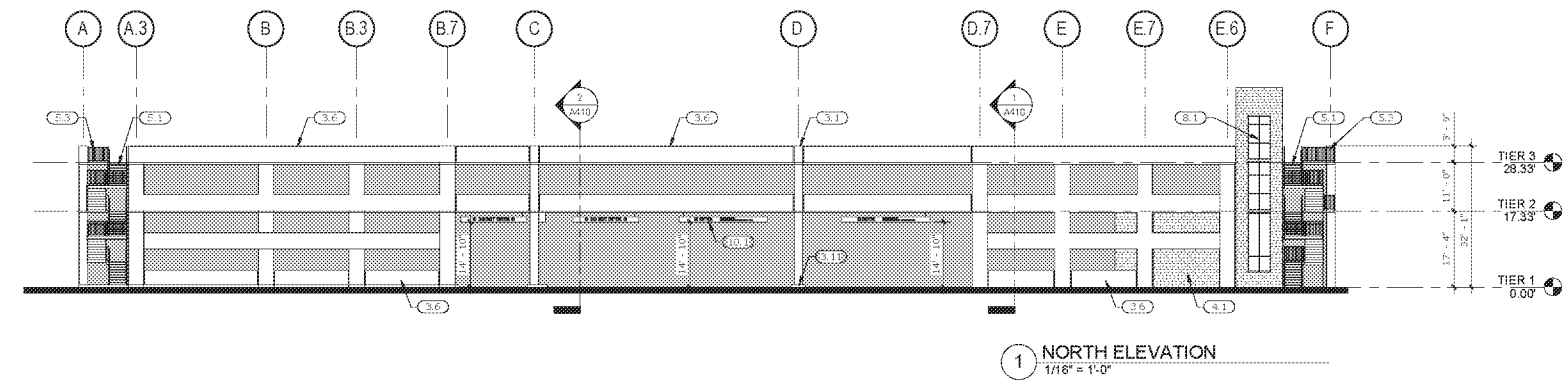


CONSULTANT:

DISCUSSION DRAFT

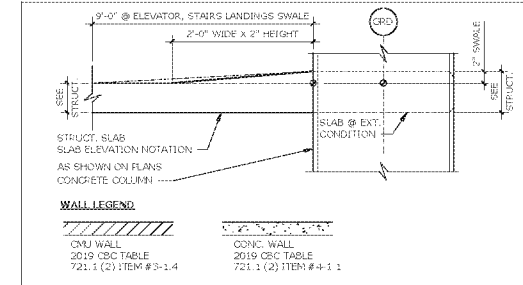
INGLEWOOD BASKETBALL & ENTERTAINMENT CENTER PARKING STRUCTURE

1313 S. DISTRICT DR. INGLEWOOD, CALIFORNIA



NOTES

- 1. MAX SLOPE OF 1.85 % AT ANY DIRECTION AT ALL ACCESSIBLE STALLS, ELEVATOR, STAIRS LANDINGS
- 2. CROSS SLOPE INSIDE THE ADA PATHWAY NOT EXCEED GRADIENT (1.85%) IN ANY DIRECTION
- 3. CONTRACTOR TO VERIFY AND CONFIRM THAT 8'-2" CLEAR IS MAINTAINED AT ALL ACCESSIBLE LEVELS (INCLUDING PIPES, DUCTS, LIGHTS)
- 4. ALL VERTICAL PIPE EXPOSED TO VEHICULAR IMPACT TO BE PROTECTED PER DET. 9/A901
- 5. ALL METALS NEED TO BE PRIME AND PAINTED
- 6. ROTARY FINISH ON THE ENTIRE DECK EXCEPT FOR ELEVATOR LOBBIES & ROOMS
- 7. MEDIUM BROOM FINISHED @ ELEVATOR LOBBIES AND @ ALL ROOMS.



DATE: 04.06.20	
DWG. ID	
EXTERIOR BUILDING ELEVATIONS	
JOB NO:	2018-007
DATE:	05.11.20
DRAWN BY:	J.C.
SCALE:	As indicated
CHECKED BY:	G.R.



City Council Staff Report  
Attachment 3:  
Conceptual Renderings and Landscape Plan

IBEC PROJECT CONCEPTUAL RENDERING

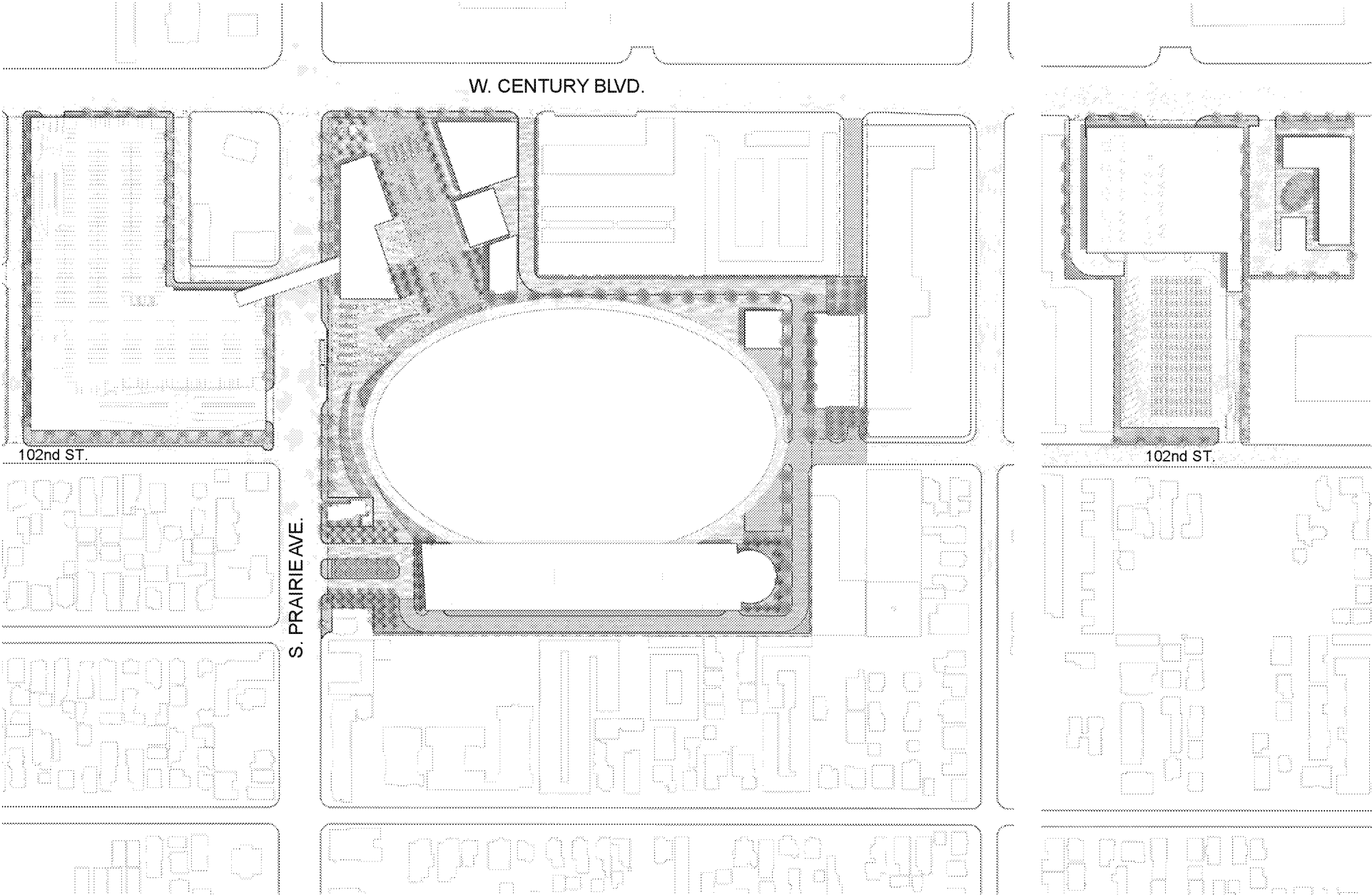
AERIAL VIEW



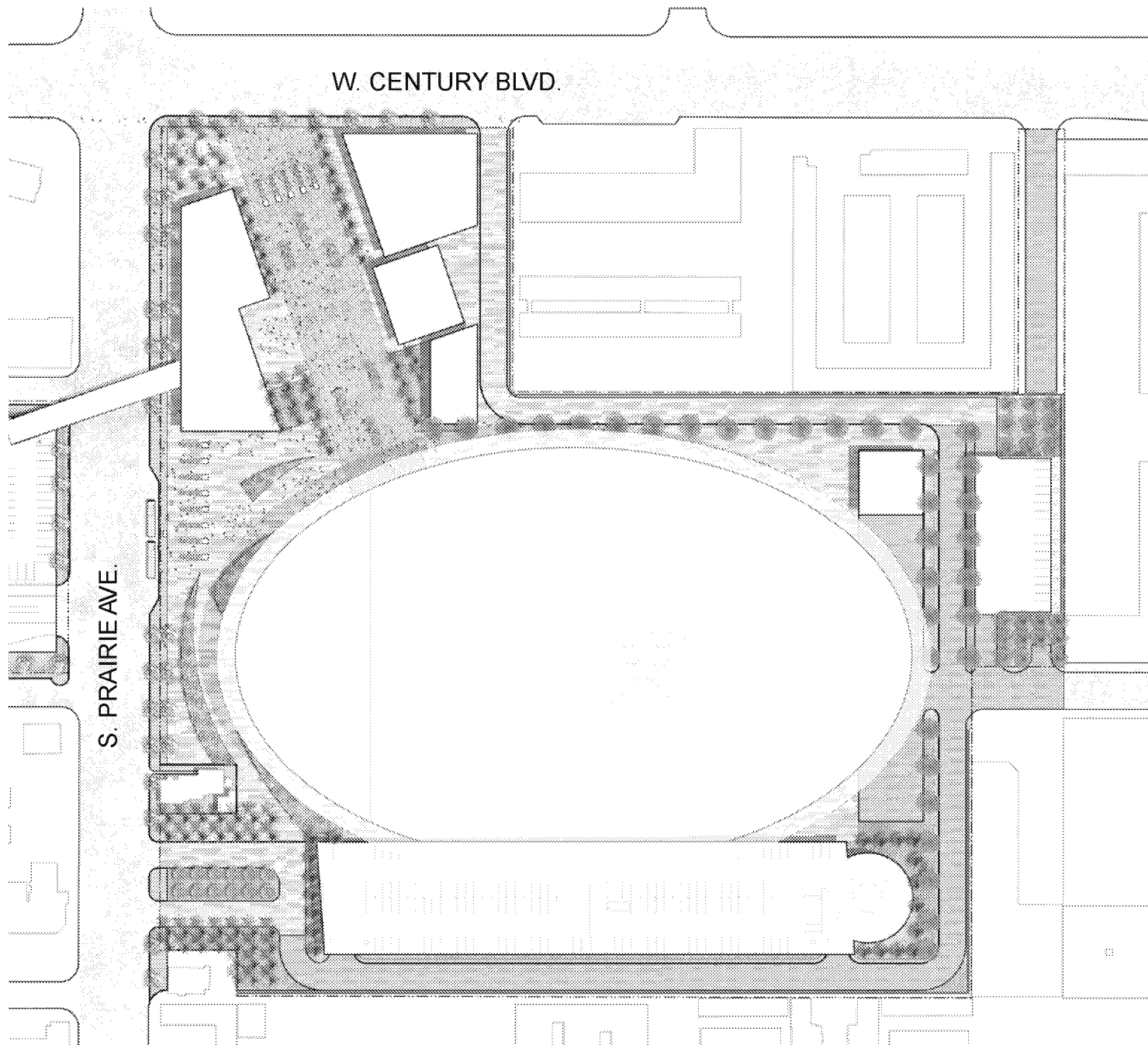
IBEC PROJECT CONCEPTUAL RENDERING  
PLAZA VIEW



IBEC PROJECT CONCEPTUAL LANDSCAPE PLANS

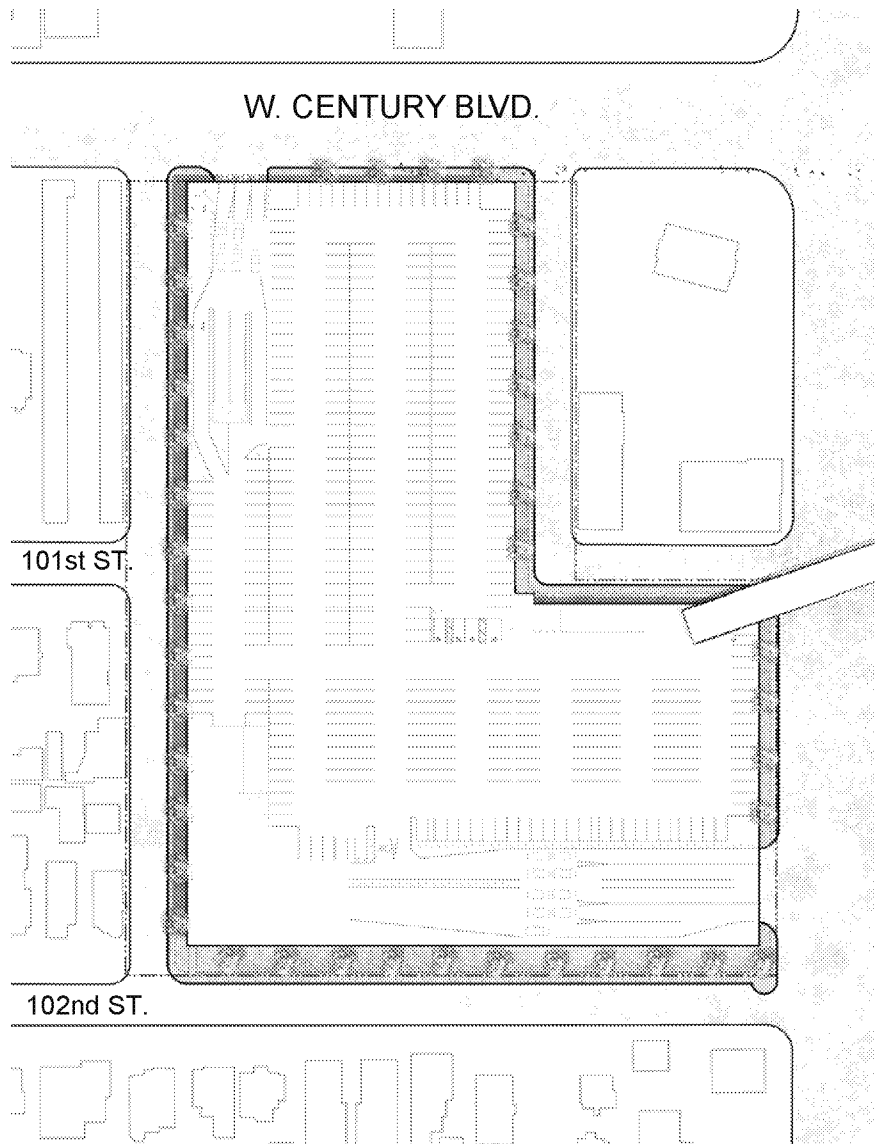


# IBEC PROJECT CONCEPTUAL LANDSCAPE PLANS

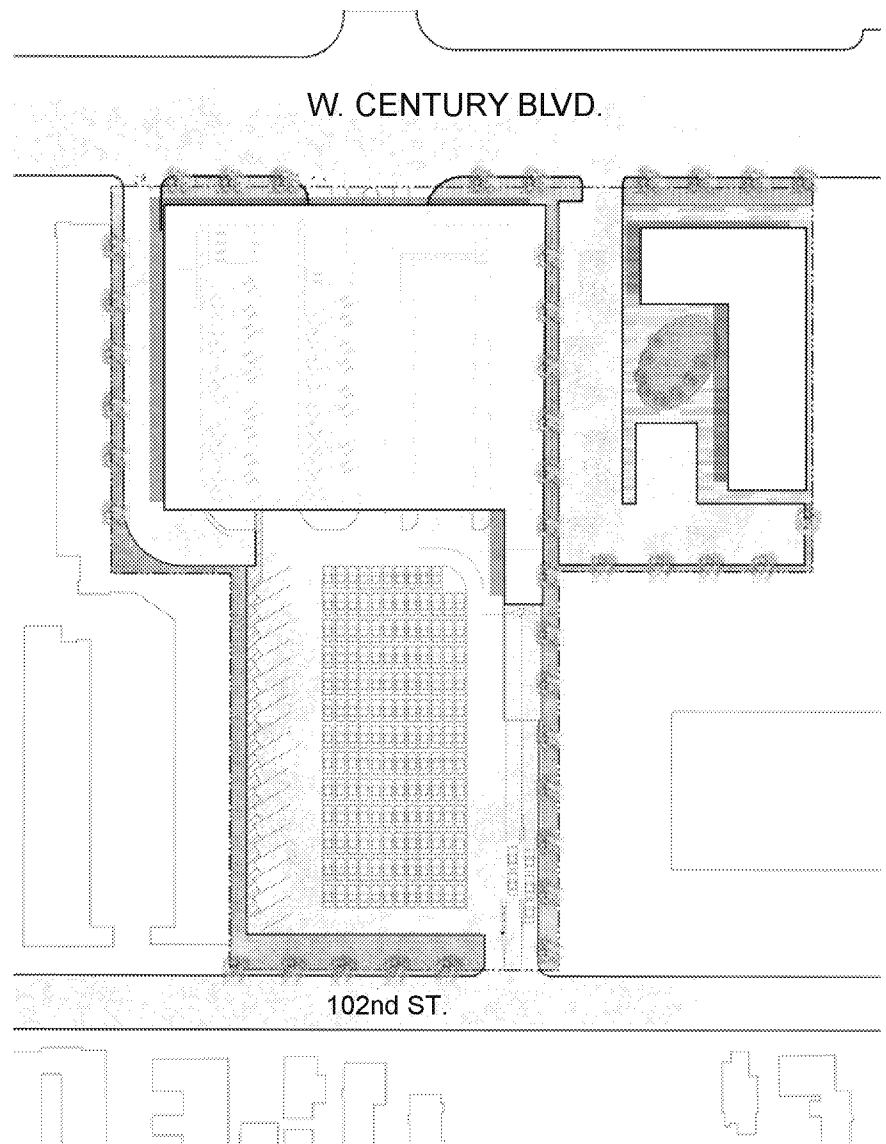


ARENA SITE

# IBEC PROJECT CONCEPTUAL LANDSCAPE PLANS



WEST PARKING GARAGE SITE



EAST TRANSPORTATION AND HOTEL SITE

City Council Staff Report  
Attachment 4:  
General Plan Consistency Findings

## GENERAL PLAN CONSISTENCY FINDINGS

Murphy's Bowl, LLC (Project Sponsor), seeks the development of the Inglewood Basketball and Entertainment Center (IBEC) that includes an arena intended to promote the enjoyment and recreation of the public by providing access to the City's residents in the form of spectator sports, specifically basketball, with up to 18,000 fixed seats to host National Basketball Association (NBA) games, and with up to 500 additional temporary seats for other events such as family shows, concerts, corporate and community events, and other sporting events; an up to 85,000-square foot team practice and athletic training facility; up to 71,000 square feet of LA Clippers office space; an up to 25,000-square foot sports medicine clinic; up to 63,000 square feet of ancillary and related arena uses including retail and dining; an outdoor plaza adjacent to the arena; parking facilities; relocation of a City of Inglewood groundwater well; and various circulation, infrastructure, and other ancillary uses (the Project). The Project also includes a limited-service hotel.

Implementation of the Project requires various approvals from the City, including certain text and map amendments to the General Plan, as more particularly described in Planning Commission Resolution No. 1869 (General Plan Amendments) and City Council Resolution No. \_\_\_\_ (Adopting General Plan Amendments). The City has reviewed the Project, which includes the Approval Actions required for its implementation, as additionally set forth in the CEQA Findings, for consistency with the City's General Plan, as it is proposed to be amended by the General Plan Amendments. Based on this review, and as further described below, the City concludes that the Project and the Approval Actions<sup>1</sup> are each, on balance, consistent with the relevant applicable General Plan policies, goals and objectives of the General Plan, as proposed to be amended. Text proposed by the General Plan Amendments is shown in **bold underline**. Additional detail regarding much of the underlying analysis and evidence is contained in the agenda reports to the City Council and to the Planning Commission, the EIR and all appendices thereto; Planning Commission Resolution No. 1868 (Recommending Certification of the EIR and Adoption of MMRP and CEQA Findings and Statement of Overriding Considerations) including the CEQA Findings and MMRP attached as Exhibit B and C thereto; all plans, drawings, and other materials submitted by the Project Sponsor; minutes, reports, and public testimony and evidence submitted as part of the City Council's duly noticed meeting(s) regarding the IBEC Project; the record of proceedings prepared in connection with AB 987 pursuant to Public Resources Code § 21168.6.8; and all other information contained in the City's administrative record concerning the Project (collectively, the Record). Information in this analysis regarding fiscal and economic data is sourced from the HR&A Report prepared for the Project, which has been peer reviewed by a report prepared by Keyser Marston Associates ("KMA") on behalf of the City. The analysis in the Record has been considered by the City Council, reflects the City Council's independent judgment and analysis, and is incorporated into these findings by reference

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<sup>1</sup> These consistency findings do not include any Approval Actions related to the potential exercise by the City of its eminent domain authority, which is at the City's sole discretion under the terms of the proposed Disposition and Development Agreement for the Project.



## **I. LAND USE ELEMENT**

The Land Use Element presents a long-range plan for the distribution and future use of land within the City. Relevant policies, goals and objectives applicable to the Project are as follows:

### ***General:***

- Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts.
- Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.
- Promote Inglewood's image identity as an independent community within the Los Angeles metropolitan area.

The majority of the Project is designated in the General Plan as Industrial, with a small portion of the site adjacent to S. Prairie Avenue, just south of W. Century Boulevard, designated as Commercial. To implement the Project, amendments are proposed to the Land Use Element to provide a uniform land use designation for the Project site that reflects its proposed uses. This principally involves expressly referencing sports and entertainment facilities and related uses on properties in the Industrial land use designation (see below) and amending the Land Use Map to designate the entire Project site as Industrial. These amendments are further described in the Planning Commission Agenda Report and City Council Agenda Report. Additional amendments are proposed to the Circulation Element and Safety Element, which are discussed in Sections II and VII below.

Historically, the Project site has been challenging to develop and utilize due to its location under the Los Angeles International Airport ("LAX") flight path. Most of the currently vacant parcels comprising the Project site were previously developed, but were purchased by the City and the former Inglewood Redevelopment Agency using FAA-issued noise grants to the City of Inglewood as part of the LAX Noise Control/Land Use Compatibility Program, with the objective of recycling incompatible residential land use to other land uses compatible with the noise levels of airport operations. These parcels were specifically acquired in order to eliminate incompatible residential use in the near term and stimulate economic development in the long term by converting the parcels in this area to noise-compatible commercial, industrial, or other revenue-generating uses. The City has worked for many years to market the property for redevelopment with noise-compatible uses, but these efforts have never come to fruition, other than a portion of the Project site used as a private parking lot from 2013-2017.

The Project provides for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts because as established above, the Project is part of a concerted and longstanding effort to redevelop parcels in the LAX flight path with noise-compatible, productive uses suitable for the recreational enjoyment of the public. The Project's sports and entertainment, retail and restaurants, parking structure and other uses diversify the City's land use and are compatible with and complement other commercial and industrial land uses in the area and the City.

The Project would help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions because it would redevelop the site into a state-of-the-art sports and entertainment facility with related uses that promotes economic development and increases employment opportunities for the City's residents. In addition to redevelopment of vacant and underutilized parcels, the economic development and employment opportunities include but are not limited to the following during the construction period and during subsequent Project operations. 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, and 8% related to business tax on contractor earnings. Construction of the Project will also generate about \$10.3 million from the Project's Art Fee and School fee, which are non-general fund revenues.

Upon stabilized Project operation in 2025, the Project is expected to produce (calculated in 2019 dollars) approximately \$4.5 million in annual net tax revenues, plus \$2.3 million in annual property tax revenue for the Inglewood Unified School District.<sup>2</sup> Cumulatively, it will produce approximately \$70.0 million in net fiscal impact (or \$149.1 million in nominal dollars) plus approximately \$72.4 million in normal property tax revenues.

The fiscal analysis for the Project also included a 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 \$4,000,000, or \$132,000,000 cumulatively in nominal dollars. 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.

During construction, approximately 7,269 total headcount (direct on-site plus multiplier effect) jobs will be created, of which approximately 7,020 will be full-time and part-time construction jobs at the Project site. 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. 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 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.

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<sup>2</sup> 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.

In addition, the Project would provide extraordinary public benefits contained in Exhibit C, attached to the Development Agreement, including creation of local jobs and workforce equity. For example, as set forth in Exhibit C to the Development Agreement, the Project must comply with certain steps with the goal of hiring qualified Inglewood residents for no less than 35% of the employment positions needed in connection with the event operations at the Arena. In addition, the Development Agreement contains goals for significant participation by minority/disadvantaged business enterprises and related local hire provisions, along with job fairs, a workforce outreach coordination program, contributions to job training programs for Inglewood residents, and good faith efforts to lease at least one restaurant space to a qualified Inglewood business for at least one year. Additional public benefits include commitments to affordable housing and renter support, rehabilitation of Inglewood Public Library and creation of a community center, support for Inglewood youth, education, support for Inglewood seniors, improving Inglewood parks, and sustainable construction practices and eco-friendly building operations.

The Project promotes the City's image and identity as an independent community within the Los Angeles metropolitan area by facilitating the return of an NBA franchise to the City known as the "City of Champions." The Project promotes the City's image and identity as a premier regional sports and entertainment center at the regional, national, and international level and complements the adjacent new development at Hollywood Park, including its National Football League stadium, creating a world-class sports and entertainment district for the recreational enjoyment of the public.

***Residential:***

- Foster the revitalization or, if necessary, the recycling of residential areas which cannot provide a decent living environment because of jet noise impact.

The Project site does not include parcels with a residential land use designation under the General Plan, and no residential uses are proposed in connection with the Project. However, because the General Plan includes policies, such as the above residential policy, that are not explicitly limited to development within the residential land use designation, analysis of this policy has been included for completeness. The General Plan and Los Angeles County Airport Land Use Compatibility Plan both establish that the area in which the Project site is located is not appropriate for the development or redevelopment of residential uses given its location under the Los Angeles International Airport Flight Path. The Project does not include residential uses, nor does it directly impact housing stock. Rather, the Project facilitates development of sports and entertainment facilities and related uses, which are compatible land uses within the noise impacted area, and are consistent with the FAA-issued noise grants, as further discussed in the letter to the City dated August 26, 2019, from Mr. David Cushing, Manager of the FAA's Los Angeles Airport District Office.

As noted above, the majority of parcels comprising the Project site were purchased by the City and the former Inglewood Redevelopment Agency utilizing FAA-issued noise grants for the specific purpose of recycling incompatible residential land use to land uses which are compatible

with the noise levels of LAX airport operations. These parcels were specifically acquired in order to eliminate incompatible residential uses in the near term and stimulate economic development in the long term by converting the parcels in this area to noise-compatible commercial, industrial, or other revenue-generating uses. The Project meets these objectives by developing sports and entertainment facilities and related uses that are consistent with the FAA-issued noise grants. Accordingly, and for reasons more fully stated in the Los Angeles County Airport Land Use Commission findings and order, all of which are incorporated herein by reference, the Project (expressly including an arena for sports and entertainment uses, athletic practice and training facility, office space for the NBA team, sports medicine clinic, retail/commercial uses, community space, parking, hotel signage and relocation of a municipal water well) is fully consistent with the Los Angeles County Airport Land Use Plan.

*Commercial:*

- Create and maintain a healthy economic condition within the present business community and assist new business to locate within the city.
- Continue to promote the development of high quality commercial/office space at appropriate locations within the city through the redevelopment process.
- Promote the development of commercial/recreational uses which will complement those which already are located in Inglewood.

As discussed above, the majority of the Project site is designated under the General Plan as Industrial, with a small portion of the site designated as Commercial. The General Plan Amendments propose to apply a uniform Industrial land use designation for the Project site. Because the General Plan includes policies, such as the above commercial policies, that are not explicitly limited to development within the commercial land use designation, analysis of these policies has been included for completeness.

The Project would maintain a healthy economic condition within the present business community and assist new business to locate within the City as follows. The Project supports the City's economic growth by contributing to the City's financial base and overall fiscal stability based on increased City revenue (including property, construction, sales, and admissions taxes) generated by the Project. The Project would stimulate new businesses and create new employment opportunities for the City's residents, including but not limited to new construction jobs and permanent jobs for annual Project operations (including non-event jobs and full-time equivalent event-related jobs), all as discussed in the HR&A Report and the Keyser Marston Peer Review Report as summarized above. As described above, the Project would provide extraordinary public benefits contained in Exhibit C, attached to the Development Agreement, including the creation of local jobs and workforce equity.

The Project would redevelop a largely vacant and underutilized area with high-quality commercial uses, including a sports arena, retail, and office space, in a transit-accessible area appropriate for those uses, which would complement existing commercial/recreational uses already located in Inglewood, including the adjacent mixed-use Hollywood Park development. The Project would improve the existing visual appearance of the Project site, including its

frontage along West Century Boulevard and South Prairie Avenue, which currently is characterized by underutilized and largely vacant parcels. The Project would be required to comply with project-specific design guidelines, and would comply with a plan review process to ensure that the Project's new development is visually compatible with and complementary to its site and surroundings. As further described below, the Project will provide transportation infrastructure and utilities improvements required to serve the Project.

***Industrial:***

- Provide a diversified industrial base for the City. Continue to improve the existing industrial districts by upgrading the necessary infrastructure and by eliminating incompatible and/or blighted uses through the redevelopment process.
- Continue the redevelopment of Inglewood by promoting the expansion of existing industrial firms and actively seek addition of new firms that are environmentally non-polluting.
- Increase the industrial employment opportunities for the City's residents.
- **[As Proposed to Be Amended] Promote the development of sports and entertainment facilities and related uses on underutilized land, in appropriate locations, creating economic development and employment opportunities for the City's residents.**

With adoption of the proposed General Plan amendments, the entire Project site is designed as Industrial under the General Plan Land Use map. (Prior to adoption of the proposed General Plan amendments, the majority of the Project site was designated Industrial and a small portion of the Project site along the South Prairie Avenue corridor was designated as Commercial.) The General Plan amendments would allow for development of sports and entertainment facilities and related uses within the Industrial land use designation on land that is currently underutilized and historically has been challenging to develop, thereby assisting in eliminating incompatible uses, as discussed above and, further diversifying the industrial and employment base, as discussed above. In addition, it would improve existing and create new infrastructure for water, wastewater, drainage, electricity, natural gas and telecommunication services. It would also include many improvements to transportation infrastructure such as restriping, converting medians to turn lanes, widening of freeway off-ramps, and signal timing improvements through the Citywide ITS program, that serve the broader area, all as reflected in the MMRP. The Project incorporates new uses that support the economic development and employment goals of the General Plan and adds employment opportunities for the City's residents, as discussed above.

The Project is consistent with the General Plan's policy of promoting the addition of new uses that are environmentally non-polluting. The Project will be designed and constructed to meet the US Green Building Council's Leadership in Energy and Environmental Design (LEED®) Gold Certification requirements. The Project will also implement a wide range of mitigation measures intended to reduce or eliminate environmental impacts associated with Project construction and operation, including commitments to a comprehensive Transportation

Demand Management program and meeting a net-zero greenhouse gas standard, as reflected in the MMRP.

On May 6, 2020, the Planning Commission recommended certain General Plan Amendments (GPA 2020-002) to amend the Land Use Element to clarify existing population density and building intensity allowances for all land use designations and on June 30, 2020, the City Council adopted these amendments. The Project is consistent with the Land Use Element policies regarding building intensity allowance applicable to the Industrial designation. Those separate and independent General Plan Amendments merely clarified and expressly quantified pre-existing (and already binding) population density and building intensity allowances for all land use designations by incorporating those population density and building intensity standards from the City's prior existing applicable laws and regulations. Accordingly, those amendments do not alter the Project's consistency with the General Plan Land Use Element, and the Project is consistent with the City's General Plan Land Use Element, both as the General Plan existed prior to the June 30, 2020 amendments and as the General Plan now exists following the June 30, 2020 Amendments. Building intensity, also expressed as "Building Area Ratio" under the General Plan Amendments (GPA 2020-002), refers to the total building floor area divided by the site area and is the standard utilized for commercial, industrial and public/quasi-public uses. The Building Area Ratio applicable to areas designated as Industrial under the General Plan is 13.18:1 or otherwise stated as 1380 percent. The Project would comply with this permitted Building Area Ratio as it would include development of approximately 2,789,000 square feet on the approximately 28.1-acre Project site, which includes approximate Building Area Ratios of 196 percent on the Arena site; 468 percent on the West Parking site; 104 percent on the East Transportation and Hotel site; and zero percent on the Well Relocation site.

***Circulation:***

- Ensure that proposed new uses can be accommodated by adequate and safe streets.
- Promote and support adequate public transportation within the city and the region.
- Develop modified traffic systems that will discourage through traffic from utilizing neighborhood streets.
- Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

The Project would be located at the intersection of South Prairie Avenue and West Century Boulevard, which are both designated as major arterials in the General Plan. South Prairie Avenue runs north/south along the project frontage, and provides two travel lanes in each direction north of Manchester Boulevard, and three travel lanes in each direction south of Manchester Boulevard. West Century Boulevard runs east/west adjacent to the Project site, providing three travel lanes in each direction with a center turn lane. Other major arterials in the vicinity that would serve the Project are La Brea Avenue, Hawthorne Boulevard, Crenshaw Boulevard, and Manchester Boulevard. The EIR includes a comprehensive transportation analysis that considers net new traffic projected to be generated by the Project under a large

number of scenarios at various times of the day and days of the week, both with and without special events, and including concurrent event scenarios with the Forum and Hollywood Park.

The EIR also identifies various measures that will be implemented to reduce or avoid Project impacts related to transportation and circulation, which have been included in the MMRP adopted with Project approval. These include implementation of an Event Transportation Management Plan, a management and operating plan intended to manage high levels of traffic on streets in the vicinity of the Project, and other area parking garages and key travel corridors in order to facilitate adequate and safe street access to and from the Project site. The Event TMP includes a Neighborhood Traffic Management Plan that includes goals and requirements for reducing traffic volumes on local and collector street segments, and discouraging and reducing event-related cut-through traffic while maintaining access for residents, adequate and safe streets, and discouraging through traffic from utilizing neighborhood streets.

Physical improvements include restriping, converting medians to turn lanes, widening of streets and freeway off-ramps, and signal timing improvements. The Project would also include implementation of several transportation management plans, including: a Construction Traffic Management Plan to ensure that acceptable operating conditions on local roadways are maintained during Project construction; a comprehensive TDM program that includes strategies to reduce vehicle trips and encourage other modes of travel; and a Local Hospital Access Plan to ensure that safe and timely routes to the hospital are provided in all pre- and post-event scenarios, all as reflected in the MMRP.

The Project includes various strategies to promote and support the use of public transportation as a means of travel to and from the Project through several measures, including a transportation hub at the East Transportation and Hotel site, shuttle stops on South Prairie Avenue, and a shuttle system for large events that would connect the Project to nearby Metro Crenshaw and Green Line Rail Stations. There are currently eight bus stops located on streets and sidewalks adjacent to the Project site. The TDM programs will include bus stop facilities improvements, such as providing on-site and/or off-site improvements such as lighting, new benches and overhead canopies, adding bench capacity if needed, and real-time arrival information. The Project would exceed the requirements of the City of Inglewood Municipal Code for the provision of short- and long-term bicycle parking.

As reflected in the MMRP, the TDM Program will also implement an extensive range of programs intended to encourage use of alternate modes of transportation including public transit, shuttles, ridesharing, walking, and biking, including but not limited to: programs to encourage use of alternative mode of transportation, such as integrated event and transit tickets, bus facility improvements, employee transit or vanpool subsidies; event-day dedicated shuttle services to provide connections with short wait-times from the Project to existing and future LA Metro Green Line and Crenshaw Line stations; programs to encourage use of carpools and vanpools, including incentives like preferential parking, reduced parking cost, and variable parking pricing based on vehicle occupancy; programs to encourage active transportation, such as biking and walking, including bicycle parking, showers and lockers for employees, bike valet, and improved sidewalks and pathways to create safe routes throughout the Project site; a Park-n-Ride program

that would use chartered buses to connect the Project to park-n-ride parking lots at key locations around the region; information services to inform the public about alternative ways to travel to and from the Project site; and event-day local microtransit service for a limited number of employees and attendees that would provide a microbus with a service range of 6 miles around the Project site.

The Project also includes streetscape and pedestrian circulation system improvements that will increase walkability and improve the pedestrian and bicyclist experience and accessibility for all users including those with disabilities that impair mobility, on adjacent public rights of way near the Project site. The Project will include illumination to highlight circulation path and landscape features, and to create a safe pedestrian experience. To reduce impacts related to new sources of substantial light or glare, the Project is required to implement a Lighting Design Plan approved by the City, as reflected in the MMRP. These improvements would all be constructed to current accessibility standards.

The Project's consistency with the goals and policies of the General Plan related to circulation is further discussed in EIR Section 3.14, Transportation and Circulation, as is incorporated herein by reference. The analysis identifies a required amendment to the map on page 17 of the Circulation Element and the text on page 21 of the Circulation Element (proposed as part of the Project; see Section II CIRCULATION ELEMENT discussion below), and otherwise does not identify any inconsistencies with General Plan policies related to circulation.

*Community Facilities:*

- Maintain the present high level of police and fire services as fiscally prudent.
- Expand opportunities for cultural and social growth for the City's residents.

Analysis in Chapter 3.13 of the EIR establishes that the City will be able to maintain the present high level of police and fire services with the Project. As discussed in greater detail in the EIR, fire protection would be provided by the Los Angeles County Fire Department (LACFD) which provides protection services on a regional basis from a multitude of fire stations, the closest of which are Stations 170, 18, and 173, located within 1.5 miles of the Project site, and four additional fire stations located within 2.5 miles of the Project site. While the Project will increase call volumes to the LACFD, sufficient capacity exists among the stations in the vicinity to meet the increased demand. According to the LACFD, the estimated average response time to the Project site from Fire Station 170, the first due-in station, is five minutes, which meets the response time guidelines of the LACFD. Further, the Project will generate revenue for the City's general fund that could be used to fund LACFD expenditures as necessary to offset incremental Project effects on fire protection manpower or equipment.

The City of Inglewood Police Department will provide police protection at the Project site. As explained in the EIR, according to the Inglewood Police Department, because of the Department's long history of providing service to major entertainment and sports events in Inglewood, no new facilities or personnel would be required to provide service to the Project.



As further discussed in Section I above regarding general policies under the Land Use Element, the Project would expand opportunities for cultural and social growth for the City's residents by developing a premier regional sports and entertainment center in an area that is currently underutilized and historically has been challenging to develop. The Project complements the adjacent new development at Hollywood Park, including its National Football League stadium, creating a world-class sports and entertainment district. In addition to sporting activities, it is anticipated that the Project may be utilized to host other events such as family shows, concerts, corporate and community events, and other sporting events, all of which would provide cultural and social opportunities for the City's residents. Pursuant to the terms of the Development Agreement, the Project will provide for community use of the Arena for up to 10 days per calendar year, and will dedicate to community groups an average of 100 free general admission tickets to every regular season LA Clippers game.

The Project's consistency with the goals and policies of the General Plan related to community facilities is further discussed in EIR Section 3.13, Public Services. The analysis does not identify any inconsistencies with the policies related to public services in either the Land Use Element or Safety Element (discussed below).

### ***Summary Regarding Land Use Element Consistency***

In addition to the foregoing, EIR Section 3.10, Land Use and Planning, identified potentially applicable General Plan Policies, and concluded that the Project would be consistent with the Land Use Element goals and objectives of the General Plan, as proposed to be amended.

For the foregoing reasons, the Project is consistent with the Land Use Element, as proposed to be amended.

## **II. CIRCULATION ELEMENT**

The Circulation Element is designed to require that adequate street access and traffic capacity is considered for current and future land use needs. There are three broad themes running throughout the Circulation Element: (1) presenting and analyzing the existing circulation plan, (2) disclosing additional modes of transportation, and (3) evaluating Inglewood's existing street environment and its possible enhancements (such as street widening and intersection alignments). The Circulation Element states that the circulation program presented therein is "not intended to be exhaustive or inflexible; it should be continually evaluated to determine its currentness and potential for addressing the circulation and transportation needs of this community." Certain policies related to circulation are provided in the Land Use Element, as set forth above; the consistency analysis below pertains to the content in the Circulation Element itself.

In order to implement the Project, minor amendments to the Circulation Element are proposed to revise certain maps and corresponding text to reflect the Project. The conforming amendments to the Circulation Element include minor text amendments to the "Street Classification" Map, "Traffic Generators" Map, and "Designated Truck Routes" Map to account for the Project, including to reflect the vacated portion of 101st and 102<sup>nd</sup> streets. These

amendments are further described in the Planning Commission Agenda Report. On balance, the Project is consistent with the policies, goals and objectives of the Circulation Element, as it is proposed to be amended.

As described under the analysis in Section I above related to circulation, the Project would generate additional traffic, particularly during pre- and post-event scenarios hosted at the Project site. To address potential impacts from this additional traffic, the Project would incorporate various circulation improvements around the Project site vicinity and would also include implementation of several transportation management plans, including: a comprehensive TDM program, Event Transportation Management Plan, a Construction Transportation Management Plan, and a Local Hospital Access Plan, all as reflected in the MMRP.

As discussed in Section 2.5.6 of the EIR, the Project proposes to vacate: (i) a portion of West 101<sup>st</sup> Street west of South Prairie Avenue, and (ii) a portion of West 102<sup>nd</sup> Street between South Prairie Avenue and South Doty Avenue, which would become part of the Project site. These street vacation proceedings would be carried out at the City's sole discretion, and would require a determination that the proposed street vacation segments are not necessary for present or prospective public use. This vacation would be subject to various conditions including construction of new or relocated facilities that would replace in-place utilities that serve off-site properties. To allow for Project site circulation, new site access roads would be developed. The proposed street vacation required for implementation of the Project would not adversely impact the City's circulation pattern. All other properties that are immediately adjacent to the street vacation areas would continue to have alternative, convenient pedestrian and vehicle access, including access to and from the non-vacated portions of the vacated street segments. While pedestrians and drivers would no longer have access to these vacated street segments, they could use convenient alternate routes, and these street vacations would not disrupt the City's overall circulation pattern because numerous alternative routes in the nearby vicinity are available. (See EIR p. 3.14-65 to 66, and 3.14-250)

Additionally, development of the West Parking Garage site portion of the Project site would require removal of the existing crosswalk on the north side of the South Prairie Avenue and West 102<sup>nd</sup> Street intersection, which would be relocated with a replacement crosswalk immediately south of the garage entrance/exit. Removal of this crosswalk would not create a physical barrier or obstacle to circulation that would restrict existing patterns of movement between the Project site and the surrounding neighborhoods because pedestrians could use the relocated crosswalk to cross South Prairie Avenue, walk two blocks south to the crosswalk at the South Prairie Avenue 104<sup>th</sup> Street intersections, or walk one block north to use the crosswalk located at the South Prairie Avenue and West Century Boulevard intersection. The proposed relocation of the crosswalk across South Prairie Avenue would not adversely impact the City's pedestrian circulation given the availability of nearby alternative routes. The Project also proposes to construct pedestrian bridges from certain portions of the Project site crossing (i) South Prairie Avenue and (ii) Century Boulevard to enhance public pedestrian circulation and safety.

The EIR analyzes the transportation and circulation impacts related to any potential street vacations, crosswalk relocations, pedestrian bridges, and implementation of various circulation

improvements. The conforming amendments to the various Circulation Element Maps account for these modifications to the extent necessary; the Project is consistent with the circulation patterns reflected in the Circulation Element, as proposed to be amended.

The Project's consistency with the Circulation Element and Land Use Element Policies related to circulation is further discussed in EIR section 3.14, Transportation and Circulation. The analysis concludes that the Project would not be inconsistent with the Circulation Element, as proposed to be amended.

For the foregoing reasons, the Project is consistent with the Circulation Element, as proposed to be amended.

### **III. CONSERVATION ELEMENT**

The Conservation Element address the plan for conservation, development and utilization of natural resources found within the jurisdiction of the City. Relevant policies, goals and objectives applicable to the proposed Project are as follows:

- Protect aquifers and water sources (which includes prevention of contamination of ground water by surface contaminations leaching into the soil).
- Reduce the ever-increasing demand being placed on the aquifers and on the statewide water sources.
- Implement National Pollutant Discharge Elimination System (NPDES) requirements applicable to the City.
- Require periodic sweeping to remove oil, grease and debris from parking lots of 25 spaces or more.

As discussed in EIR Chapter 3.9, the Project is required to comply with federal, state, and local regulations and will implement Best Management Practices (BMPs) to reduce erosion and runoff to protect aquifer and water resources. The Project is also required to comply with the NPDES General Construction Permit and related Inglewood Municipal Code regulations, which prevent the substantial degradation of water quality during construction of the Project.

The Project is also required to comply with various regulations protecting water quality, including the MS4 permit, the County's LID Standards Manual, and the City's LID Requirements during operations, all of which implement BMPs and stormwater quality control measures to reduce pollutants in stormwater discharges and improve water quality, preventing the contamination of groundwater. As reflected in the MMRP, the Project is required to prepare a Project-specific LID Report to reduce the volume of stormwater runoff and potential pollutants in stormwater runoff at the Project site. The Project will protect groundwater quality through implementation of site design, source control and treatment control design features prior to discharge of runoff into the groundwater. The Project would incorporate a bio-filtration system in landscaped areas throughout the Project site to capture site runoff from roof drains, treat the

runoff through biological reactions within the planter soil media, and discharge at a rate intended to mimic pre-developed conditions.

The Project will not interfere with groundwater recharge or demand being placed on aquifers. Due to the development associated with the Project, it is estimated that approximately 90 percent of the Project site would be covered by impervious surfaces. However, because the existing condition of the Project site is developed with impervious surfaces that have a low infiltration and groundwater recharge or are impervious surfaces, the net change of groundwater recharge at the Project site would be negligible.

The Project will include a number of indoor and outdoor enhanced water conservation and water reuse measures based on the requirements established for the LEED® Gold Certification. The Project is designed to include other water conservation measures such as installation of low-water landscaping materials; use of recycled water for landscaping purposes; use of water efficient fixtures and equipment; and installation of a specialized cooling tower system that is equipped with water-efficient technologies.

As discussed in EIR Chapter 3.15, with respect to access to water supply for the Project, as reported in the Golden State Water Company's (GSWC) 2015 Urban Water Management Plan, water usage per capita within its Southwest System service area in which the Project is located has declined notably over the last decade due to a combination of factors including tiered water pricing, increasing water conservation regulations, the extended drought, and the recession. This documented reduction in per capita water use, combined with GSWC's commitment to continued water conservation efforts and compliance with relevant State requirements, as well as efforts by West Basin Municipal Water District to increase recycled water use, further reinforce that both the Project and water service within GSWC's Southwest System are in alignment with the City's policy regarding water demand management and that the Project will not increase demand being placed on the aquifer and on statewide water sources in a manner inconsistent with the General Plan.

As part of the Project, the existing Inglewood Water Well #6 will be decommissioned in compliance with federal, state, and local standards and replaced with a new Water Well #8 within the Well Relocation site, which consists of two parcels south of West 102<sup>nd</sup> Street and west of South Doty Avenue, within the Project site. While the new Water Well #8 would have increased capacity as compared to Water Well #6, because the net change in groundwater recharge would be negligible with implementation of the Project, use of new Water Well #8 will not result in substantial depletion of groundwater supplies.

Lastly, the Project will implement periodic sweeping of parking lots to remove oil, grease, and debris from parking lots of 25 spaces or more, as reflected in the MMRP.

The Project's consistency with the goals and policies of the Conservation Element is discussed in various sections of the EIR, including Section 3.2, Air Quality; 3.3, Biological Resources; 3.9, Hydrology and Water Quality; and 3.15, Utilities and Service Systems. The EIR concludes that the Project is not inconsistent with these goals and Policies.

For the Foregoing reasons, the Project is consistent with the Conservation Element.

#### **IV. HOUSING ELEMENT**

The General Plan Housing Element 2013-2021, adopted on January 28, 2014, presents a framework for City implementation of a comprehensive housing program from 2013 to 2021 to facilitate decent and affordable housing for its residents. The Housing Element establishes policies to create or preserve quality residential neighborhoods. The Housing Element identifies current and future housing needs and establishes policies and programs to mitigate or correct housing deficiencies.

As further discussed in Section I above, the Project site currently does not include any housing, and does not include any sites identified in the Housing Element for housing. The General Plan Land Use Element states that the area in the City generally bounded by Crenshaw Boulevard on the east, La Cienega Boulevard on the west, Century Boulevard on the north and 104<sup>th</sup> Street on the south, in which the Project site is located, is “an extremely undesirable location for residential usage because it is severely impacted by jet aircraft noise.” As described above, most of currently vacant parcels comprising the Project site were purchased by the City and the former Inglewood Redevelopment Agency using FAA-issued noise grants to the City of Inglewood as part of the LAX Noise Control/Land Use Compatibility Program, with the objective of recycling incompatible residential land use to other commercial land use compatible with the noise levels of airport operations. As further discussed in the letter to the City dated August 26, 2019, from Mr. Davis Cushing, Manager of the FAA’s Los Angeles Airport District Office, the FAA does not support the reintroduction of residential uses on these type of noise-impacted parcels.

The Project does not propose the development of housing, and would not impact existing housing stock. The Project includes a number of community benefit commitments designed to further general goals of the City regarding housing, including funding for affordable housing, first time homebuyers assistance, support for rental and anti-eviction services, and capacity building for housing-focused non-profits.

The goals and policies of the Housing Element are further discussed in EIR Section 3.12, Population, Employment, and Housing. The analysis concludes that because the Project site does not include housing and is not identified as a site for housing within the Housing Element, the goals and policies identified in the Housing Element are not applicable to the Project.

For the foregoing reasons, the Project is consistent with the Housing Element.

#### **V. NOISE ELEMENT**

The Noise Element is designed to manage noise within the City and to protect sensitive uses from excessive noise-related impacts. Relevant policies, goals and objectives applicable to the proposed Project are as follows:

- Goal 1: Provide for the reduction of noise where the noise environment represents a threat to public health and welfare.
- Goal 2: Reduce noise impacts in degraded areas.
- Goal 3: Protect and maintain those areas having acceptable noise environments.
- Goal 4: Provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions.
- Policy 4.1: Provide for measures to reduce noise impacts from traffic noise sources
  - Construct barriers to mitigate sound emissions where necessary or where feasible.
  - Reduce transportation noise through proper design and coordination of routing.
- Policy 4.2: Incorporate noise considerations into land use planning decisions.
  - Ensure acceptable noise levels near schools, hospitals, convalescent homes, and other noise sensitive areas.
  - Encourage acoustical design in new construction.
- Policy 4.3: Develop measures to control non-transportation noise impacts.
  - Evaluate noise generated by construction activities.
- Policy 4.4: Reduce Noise Conflicts at the Source.
  - Actively support the FAR Part 150 Noise Compatibility Program as described in the “Noise Control and Land Use Compatibility Study, Los Angeles International Airport.” (March 1984).
  - Provide quick response to complaints and rapid abatement of noise nuisance within the scope of the City’s police powers.
- Policy 4.5: Reduce noise conflicts at the receiver.
  - Encourage a long term development pattern which minimizes noise conflicts through planning and zoning.
  - Use redevelopment powers where appropriate and feasible to convert most seriously noise-impacted areas to less noise sensitive uses, as identified in the Noise Compatibility Program.
- Policy 4.6: Protect those who live and work in the City from dangerous on-the-job noise exposure.

Chapter 3.11 of the EIR contains a comprehensive analysis of the existing noise setting, and the Project’s potential impacts from both construction and operational noise, including from Project-related traffic, including various objective standards and measures of measurement to allow consideration of community noise levels as part of the deliberation regarding Project approvals. While the Project will generate temporary noise related to construction and permanent intermittent traffic and operational noise that would increase ambient noise levels in the Project vicinity, in some cases resulting in significant, unavoidable impacts, operation of the Project would not result in inconsistencies with the goal and policies of the Noise Element.

With respect to Goal 1 and Goal 2, the General Plan indicates that the area generally bounded by Crenshaw Boulevard on the east, La Cienega Boulevard on the west, Century Boulevard on the north, and 104<sup>th</sup> Street on the south should be designated as Industrial from the present residential and commercial, and that the site on which the Project is located should be utilized for

industrial uses given the impact of airport related noise on that area. (See General Plan, Land Use Element, p;72.) The Project includes land uses that would be appropriate given the surrounding ambient noise environment consistent with the General Plan. As discussed above in Section I, the City and the former Inglewood Redevelopment Agency used FAA and Los Angeles World Airports grant funding as part of a noise-mitigation program to acquire approximately 60 of the 65 City- and former Inglewood Redevelopment Agency (now replaced by the “City of Inglewood as Successor Agency to the Inglewood Redevelopment Agency”)-owned parcels within the Project site in order to eliminate incompatible residential uses in the near term by converting this area to noise-compatible commercial, industrial, or other revenue-generating uses. The Project is consistent with this goal because it would develop noise-compatible uses consistent with the purpose of FAA and Los Angeles World Airport grant funding. As further described in the EIR, the Project will comply with all standard building construction practices and will comply with applicable building codes for the commercial structures that would typically reduce interior noise levels to acceptable levels. Among other applicable standards, the California Green Building Standards Code (Title 24) sets forth specific noise reducing transmission standards for non-residential structures. Implementation and compliance with these requirements will be accomplished through the design process and verified in the building inspection process.

The policy initiatives expressed in Goals 1 and 2, in addition to addressing the siting of new facilities, also focus on the reduction of noise levels. In response to these policy initiatives, the Project incorporates a comprehensive program of noise reduction features that consist of Project elements and mitigation measures that would reduce potential temporary noise impacts related to construction and intermittent operational noise, particularly to sensitive receptors. Further, these Projects elements and mitigation measures have been designed to address noise near the on-site sources, which is the most effective way of reducing Project-related off-site noise levels. Accordingly, the Project implements the policy initiatives of Goal 1 and 2, and is therefore consistent with Goals 1 and 2, by reducing potential Project-related noise impacts that would otherwise occur without implementation of the Project’s comprehensive noise reduction program.

As to Goal 3, as further described in detail below, the Project is consistent with Goal 3 as it would incorporate a number of project-design features and mitigation measures that would reduce potential temporary noise impacts related to construction and intermittent operational noise, particularly to sensitive receptors.

With respect to Goal 4, the EIR incorporates robust analysis of the existing ambient community noise levels and evaluates the estimated future noise and vibrations levels at surrounding noise- and vibration-sensitive land use resulting from construction and operation of the Project to identify the potential for significant impacts and associated mitigation measures, if required. This information has been presented to and will be taken into consideration by decisionmakers.

As reflected in the MMRP, the Project will implement measures to reduce noise impacts from traffic noise sources, including a comprehensive TDM program that would reduce Project-

related traffic, resulting in a reduction a reduction in traffic noise. The Project will also implement a Construction Traffic Management Plan that would address construction traffic noise impacts in areas surrounding the Project site, by: prohibiting construction trucks from traveling on local streets; restricting the time of day of truck arrivals and departures; and restricting the size and type of trucks permitted.

The Project incorporates a range of design elements and mitigation measures, reflected in the MMRP, to control non-transportation noise impacts. These design elements and mitigation measures, as components of the Project's comprehensive noise reduction program, address both Project construction and operation. With respect to construction noise, construction noise levels generally vary considerably over the Project's short-term construction period and would cease to occur once Project construction is completed. As such, Project construction would affect noise sensitive receptors for varying durations and at varying levels over the course of Project construction (i.e., not every noise receptor would be impacted equally and would not be impacted for the entirety of Project construction). A key component of the Project's construction noise reduction program is the use of sound barriers that reduce off-site noise levels during Project construction and operation. Sound barriers would reduce construction noise in the following three ways. First, the Project includes the utilization of temporary noise walls at various locations on the Project site during construction. Second, the Project includes the placement of buildings that would be located between the arena building, by far the largest proposed on-site structure, and off-site noise receptors. As a result, these buildings would act as a sound barrier for off-site noise between an on-site construction area and off-site noise receptor. Third, the outer shell of each building once completed would act as a sound barrier for all construction that would occur inside of the buildings' outer shell. Project construction, in addition to the use of sound barriers to reduce Project construction noise levels, would include the use of "quiet" pile driving technology (such as auger displacement installation) rather than the use of driven piles for foundation support. To further manage construction noise, the Project will implement a Construction Noise Reduction Plan to minimize daytime and nighttime construction noise at nearby noise sensitive receptors. During construction activities, the Project will include designation of a Community Affairs Liaison who will be responsible for promptly responding to any local complaints about construction activities. The Project will also implement a Construction Traffic Management Plan that will address construction traffic noise impacts in areas surrounding the Project site by: prohibiting construction trucks from traveling on local streets; restricting the time of day of truck arrivals and departures; and restricting the size and type of trucks permitted.

With respect to non-transportation operational noise, the Project incorporates several strategies and mitigation measures to reduce noise from Project operations. For example, the Project operational noise levels would be reduced through the use of permanent sound barriers at various locations on the Project site, as well as the placement of buildings along the perimeter of the Project site that would be located between certain on-site noise sources and off-site noise receptors resulting in a sound barrier effect for those off-site noise receptors within line-of-site of an on-site activity area. (See EIR pages 3.11-70 and 3.11-143). To further reduce Project



operational noise levels, the Project also will implement an Operations Noise Reduction Plan for major event pre- and post-event conditions.

The EIR for the Project analyzes the 14 CFR Part 150 noise contours and evaluates the compatibility of the Project's proposed land use with those noise contour. The Airport Land Use Plan Land Use Compatibility Chart is depicted in EIR Section 3.10, Land Use and Planning (Figure 3.10-3). Commercial land uses are identified as compatible with 65 70 dBA CNEL noise levels. The CFR Part 150 Land Use Compatibility Guidelines categorizes hotel uses as a transient lodging form of residential. Additionally, and for reasons more fully stated in the Los Angeles County Airport Land Use Commission findings and order, all of which are incorporated herein by reference, the Project is fully consistent with the Los Angeles County Airport Land Use Plan. Separately, as noted above, as a means of responding to noise complaints associated with Project construction, the Project will include designation of a Community Affairs Liaison who will be responsible for responding within 24 hours to any local complaints about construction activity.

The Project's consistency with the goals and policies of the Noise Element is further discussed in EIR Section 3.11, Noise and Vibrations. The analysis concludes that the Project is not inconsistent with the relevant Noise Element goals and policies.

For the foregoing reasons, the Project is consistent with the Noise Element.

## **VI. OPEN SPACE ELEMENT**

The Open Space Element is a plan to address the current and future recreation needs of the City for parkland and recreational facilities and for the conservation of open space. The primary goal of the Open Space Element is to provide recreational park facilities for all residents in the City. The second goal of the Open Space Element is to provide additional types of open space and to preserve existing open space resources. Relevant policies, goals and objectives applicable to the proposed Project are as follows:

- Additional municipal park land shall be acquired to provide a minimum city-wide total of one acre per 1000 residents.
- The City of Inglewood in reviewing and approving development plans, shall require the provision of landscaped plazas and gardens when possible, and the provision of landscaping within building setbacks and parking lots.
- The City of Inglewood shall implement public works projects to improve streetscapes including the planting of parkway trees, the provision of landscaped street medians and the undergrounding of utility lines. The City shall also implement regulations and programs to reduce visual clutter along city streets resulting from obsolete signs, billboards, poor property maintenance, graffiti, etc.

The Project does not include residential use and therefore will not increase the residential population of the City, nor impact the one acre of park land per 1,000 residents ratios.

Consistent with the second goal, the Project includes a landscaped outdoor plaza with community gathering space, new pedestrian networks, landscaping and edge treatment, other

sidewalks and pavement improvements that would be designated to facilitate pedestrian movement and activities, as well as extensive perimeter and interior landscaping. Specifically, the outdoor plaza will include community gathering spaces, with landscaping, seating areas, public art, and outdoor stage. The Project will also pay the applicable park development fees under Inglewood Municipal Code Chapter 12.

The Project will improve streetscapes including the planting of new trees, the provisions of landscaped street medians, and the undergrounding of utility lines. The Project will also 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.

The Project's consistency with the goals and policies of the Open Space Element is further discussed in EIR Section 3.13, Public Services. The Analysis concludes that the Project will not be inconsistent with the applicable Open Space element goals and policies.

For the foregoing reasons, the Project is consistent with the Open Space Element.

## **VII. SAFETY ELEMENT**

The Safety Element contains goals, objectives and policies that are designed to ensure that the citizens of Inglewood can be protected from unreasonable risks caused by natural and manmade disasters. Relevant policies, goals and objectives applicable to the Project are as follows:

- Provide measures to reduce seismic impacts.
- Restrict new structures for human occupancy from being constructed across active faults.
- Ensure that hazardous material is located at safe distances from residences, schools, hospitals and large assemblages of people; and that they are located in zones that are appropriate for their use.
- Public safety personnel provide improved response and services to the community.
- Provide sufficient manpower and equipment to respond adequately to fire emergencies and civil disturbance.

In order to implement the Project, certain minor amendments to the Safety Element Water Distribution System Map to show the decommissioning of the existing Inglewood Water Well #6 and replacement with a new Water Well #8 and accompanying pipelines are proposed. No other amendments to the Safety Element are proposed.

As discussed in Chapter 3.6 of the EIR with respect to reduction of seismic impacts, no known active, sufficiently active, or well-defined faults have been recognized as crossing or being immediately adjacent to the Project site and the Project is not expected to expose people or structures to adverse effects from seismic-induced settlement or liquefaction as it is not located within a liquefaction Hazard Zone.

The Project will adhere to the California Building Code, established in City of Inglewood Municipal Code Chapter 11, Article 2, and enforced through plan check and building inspection services administered by the City and imposed on the Project, including seismic safety requirements in order to avoid impacts from seismic activity. The structural elements of the Project would be required to undergo appropriate design-level geotechnical evaluations prior to final design and construction in accordance with Chapter 18 of the California Building Code. The Project engineers and City building officials will implement the regulatory requirements of the California Building Code, County and City ordinances, and the California Geological Survey Guidelines for Evaluating and Mitigating Seismic Hazards in California, to ensure all buildings and structures are constructed in compliance with the law, as also detailed in California Building Code, Chapter 18.

With respect to hazardous material, the EIR analyzed the hazardous material impacts of the Project, including on nearby sensitive receptors, and concluded that the Project would not have any significant, unavoidable hazardous material impact. The Project will comply with all federal, state and local regulations regarding the handling, use, storage, transportation, and disposal of hazardous material, including in the event that hazardous material is discovered during the excavation and construction of the Project.

Construction activities would also likely require the use of limited quantities of hazardous material such as fuels, oils, and lubrications for construction equipment; paints and thinners; and solvents and cleaners. These hazardous materials are typically packaged in consumer quantities and used in accordance with manufacture recommendations, and would be transported to and from the Project site. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, State, and federal regulations including the Hazardous Waste Control Act (California Health and Safety Code section 25100 et seq.) Compliance with these requirements will ensure that the storage, handling, and disposal of hazardous materials is done in accordance with practices that minimize exposure and inadvertent releases.

The use of common hazardous materials will occur as part of the operation of the Project, primarily associated with maintenance activities as well as storage of diesel for the backup generator and biomedical supplies for the sports medicine clinic. Because hazardous material associated with the types of uses included in the Project are typically handled and transported in small quantities, and because the health effects associated with them are generally not as serious as industrial uses, operation of a majority of the new uses at the Project site would not cause an adverse effect on the environment with respect to the routine transportation, use, or disposal of general office and household hazardous material.

The sports medicine clinic included in the Project will likely include relatively small quantities of bio-hazards and other chemicals that are typically found in medical settings, such as medical supplies, oxygen tanks and other treatment supplies that fit the classification of a hazardous material waste. In addition, any administration of medication hypodermically would produce bio-hazard waste. As part of adhering to local Certified Unified Program Agency ("CUPA") requirements, the clinic would be required to prepare and submit a Hazardous Materials Management Plan and Hazardous Materials Business Plan to the County.

With respect to public services, the Project is located in close proximity to fire and police services and emergency responders are not expected to be substantially affected by the Project. (see discussion under Land Use Element, Community Facilities, above.)

The Project's consistency with the goals and policies of the Safety Element is discussed in the EIR Section 3.8, Hazards and Hazardous Materials, and 3.13, Public Services. The Analysis concludes that the Project will not be inconsistent with these goals and policies.

For the foregoing reasons, the Project is consistent with the Safety Element, as proposed to be amended.

## **VIII. ENVIRONMENTAL JUSTICE ELEMENT**

Senate Bill 1000 ("SB 1000"), the Planning for Healthy Communities Act, requires cities and counties to adopt an environmental justice element or integrate environmental justice goals, objectives, and polies into other element of their general plans. In 2018, the City separately began the process of conducting outreach and preparing an Environmental Justice Element. One May 6, 2020, the Planning Commission recommended the Environmental Justice Element for adoption (GPA 2020-001). The Environmental Justice Element sets forth goals and policies related to supporting environmental justice in the City. Relevant draft Goals and Policies applicable to the Project are as follows:

- **Meaningful Public Engagement:** Residents and stakeholders who are aware of, and effectively participate in, decisions that affect their environment and quality of life
- **Land Use and the Environment:** The community's exposure to pollution in the environment is minimized through sound planning and public decision making.
- **Mobility and Active Living:** A Community that promotes physical activity and opportunities for active living.
- **Healthy and Affordable Housing:** A City with safe and sanitary housing conditions and affordable housing options.
- **Public Facilities:** Adequate and equitably distributed public facilities are available in the community.

While the Project is fully independent of the General Plan amendment, and thus much of the Project's public review and approval occurred in advance of the City's adoption of the Environmental Justice Element, the Project was subject to a public review process that was consistent with the public participation goals set forth in the Environmental Justice Element. Specifically, the Project is subject to a public review and approval process that allows for public participation and submission of comments to City staff and decisionmakers regarding the Project. Public notice of hearings related to the Project must comply with all applicable state and local public notice requirements. The Project was studied under a robust environmental review process in compliance with CEQA that allowed for meaningful public participation. The environmental review process included a number of opportunities for meaningful public engagement, including a public Scoping Meeting on March 12, 2018, at Inglewood City Hall to provide information about the Project and the anticipated CEQA process; and a public review and comment period on the Draft EIR of 89 days, significantly exceeding the 45-day public

review period required under CEQA. During the public comment period, an electronic copy of the Draft EIR and all related appendices were made available for public review on the City's website and at the Project website ([www.IBECProject.com](http://www.IBECProject.com)), and printed copies were made available at the following locations: City of Inglewood Economic and Community Development Department; City of Inglewood Main Library; and the Inglewood Crenshaw-Imperial Branch Library. Following the public review and comment period for the Draft EIR, the City prepared responses to address the comments received on the Draft EIR within the specified public review period. These responses are provided in the Final EIR

While the Project with respect to the goal and related policies regarding community exposure to environmental pollution, as described under the Land Use Element, Noise Elements, and Safety Element analyses above, which are incorporated herein by reference, will generate certain environmental impacts related to construction and operations, it is consistent with the General Plan's policy of promoting new, non-environmentally polluting uses, and reflects sound planning and public decision making to minimize the public's exposure to pollution in the environment. The Project will be designed and constructed to meet the US Green Building Council's Leadership in Energy and Environmental Design (LEED®) Gold certification requirements. The Project will also implement a wide-range of mitigation measures intended to reduce or eliminate environmental impacts associated with Project construction and operation, including commitments to a comprehensive Transportation Demand Management program to reduce both vehicle trips and vehicle miles traveled, encourage public transit use, comply with a net-zero greenhouse gas standard, and implement all feasible mitigation measures for air quality and noise impacts, all as reflected in the MMRP. The Project is required to comply with all applicable federal and state environment regulations.

With respect to the goal and related policies regarding promotion of physical activity and opportunities for active living, the Project will include streetscape and pedestrian circulation system improvements that will increase walkability and improve the pedestrian and bicyclist experience and accessibility on adjacent public rights of way near the Project site. The Project will include illumination to highlight circulation paths and landscape features, and to create a safe pedestrian experience. The Project includes a landscaped outdoor plaza with community gathering space, new pedestrian networks, landscaping and edge treatment, other sidewalk and pavement improvements designed to facilitate pedestrian movement and activities, as well as extensive perimeter and interior landscaping. Specifically, the outdoor plaza will include community gathering spaces, with landscaping, seating areas, public art, and an outdoor stage. In addition, the Project would provide extraordinary public benefits contained in Exhibit C, attached to the Development Agreement, including improving Inglewood parks.

With respect to the goal and related policies regarding healthy and affordable housing, as described under the Housing Element analysis above, which is incorporated herein by reference, the Project does not propose the development of housing, and will not impact existing housing stock. The Project includes a number of community benefits commitments designed to further the Environmental Justice Element's provisions regarding housing, including funding for affordable housing, first time homebuyers assistance, support for rental and anti-eviction

services, and capacity building for housing-focused non-profits, as described in more detail in the public benefits contained in Exhibit C, attached to the Development Agreement.

With respect to the goal and related policies regarding adequate and equitable distribution of public facilities (such as street and roads, government buildings, schools, and public open space), the Project does not propose development of such facilities. However, the Project would include an outdoor plaza with community gathering space, and would provide the public benefits related to public facilities as contained in Exhibit C, attached to the Development Agreement.

For the foregoing reasons, the Project is consistent with the Environmental Justice Element and furthers the City's goals of achieving the goals and policies set forth therein.

## **IX. CONCLUSION**

Based on the above analysis provided in this document and as further detailed in the record, including but not limited to the CEQA Findings, Agenda Report and other documents referenced herein, the Project, on balance, is consistent with the General Plan (both as the General Plan existed prior to the separate, City-wide General Plan amendments adopted on June 30, 2020, and as the General Plan now exists with those June 30, 2020 amendments incorporate), as proposed to be amended by the Project-specific amendments described above.

City Council Staff Report

Attachment 5:

Significant and Unavoidable Impacts

*Project-Specific Significant and Unavoidable Impacts*

**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> during operation of the Proposed Project.

**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 3.14-1:** 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 3.14-28:** 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.

*Cumulative Significant and Unavoidable Impacts*

**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 3.11-5:** 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.

**Impact 3.11-7:** Construction of the Proposed Project, in conjunction with other cumulative development, would generate excessive groundborne vibration.

**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.

**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 3.14-33:** 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.

**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.

City Council Staff Report  
Attachment 6:  
Comments and Responses



# memorandum

date July 15, 2020

to Mindy Wilcox, City of Inglewood

cc Christopher Jackson, City of Inglewood  
Royce Jones, City of Inglewood

from Brian D. Boxer, AICP, ESA  
Christina Erwin, ESA

subject Inglewood Basketball and Entertainment Center EIR –Responses to Additional Letters and Emails

## Introduction

The City published the Final Environmental Impact Report (EIR) on June 4, 2020. The Final EIR included responses to comments received on the Draft EIR during the public comment period, which concluded on March 24, 2020. Although not required to do so, the City, in its discretion, also included in the Final EIR responses to four letters or e-mails that were received shortly after the close of the comment period. (See Final EIR, Table 1-1, for a list of letters and e-mails included in the Final EIR.)

The City has thereafter received additional letters and e-mails providing comments on the Proposed Project and/or the EIR. The City is not required to provide responses to comments submitted after the close of the comment period. The City has decided, however, to provide responses to these comments.

The reason for providing these responses is to ensure that the City Council is provided as much information as possible regarding the Proposed Project. In many instances, the comments do not address the EIR. Rather, the comments address the merits of the Proposed Project. Other comments address policies or issues that are not directly relevant to the EIR. Among those comments that do address the EIR, many raise issues that have already been addressed in the EIR; in those instances, the memorandum directs the reader to where that information can be located. In other instances, additional information is provided; this information, however, does not alter the conclusions or analysis that was set forth in the EIR.

This memorandum includes responses to comments submitted through July 13, 2020. Responses to comments received after that date are not included. Comments submitted after that date, but before the close of the public hearing, will be included in the record. Practical considerations, however, preclude them from being addressed in this memorandum. In particular, while we have tried to be comprehensive, it is impossible to generate instantaneous responses to comments that are submitted very late in the process. To the extent late comments are submitted, we will be prepared to provide our responses, as warranted, by separate memorandum or at the public hearing.

Table 1 identifies letters or e-mails received by the City on the Proposed Project that were not included in the Final EIR that are addressed in this memorandum. The table includes all letters or e-mails submitted through July 13, 2020.

**TABLE 1  
LATE COMMENT LETTERS RECEIVED REGARDING THE PROPOSED IBEC PROJECT**

<b>Letter #</b>	<b>Entity</b>	<b>Author(s) of Comment Letter/e-mail</b>	<b>Date Received</b>	<b>Author Submitted Comment Letter on the Draft EIR</b>
1	The Silverstein Law Firm	Veronica Lebron	April 13, 2020	No
2	The Silverstein Law Firm	Robert Silverstein	April 13, 2020	No
3	The Silverstein Law Firm	Veronica Lebron	April 22, 2020	No
4	The Silverstein Law Firm	Veronica Lebron	May 1, 2020	No
5	The Silverstein Law Firm	Robert Silverstein	May 1, 2020	No
6	The Silverstein Law Firm	Veronica Lebron	May 26, 2020	No
7	The Silverstein Law Firm	Robert Silverstein	May 26, 2020	No
8		Richard Garcia	June 8, 2020	Yes – Comment Letter Garcia
9	The Silverstein Law Firm	Veronica Lebron	June 9, 2020	No
10	The Silverstein Law Firm	Robert Silverstein	June 9, 2020	No
11		Dev Bhalla	June 10, 2020	No
12		Melissa Hebert	June 11, 2020	No
13	The Silverstein Law Firm	Naira Soghatyan	June 11, 2020	No
14	The Silverstein Law Firm	Veronica Lebron	June 11, 2020, 11:20am	No
15	The Silverstein Law Firm	Robert Silverstein	June 11, 2020	No
16	The Silverstein Law Firm	Veronica Lebron	June 11, 2020, 8:32pm	No
17	Hill, Farrer & Burrill	Kevin H. Brogan	June 15, 2020	No
18	Natural Resources Defense Council	David Pettit, Senior Attorney	June 15, 2020	Yes – Comment Letter NRDC
19	The Silverstein Law Firm	Naira Soghatyan	June 16, 2020, 2:43pm	No
20	The Silverstein Law Firm	Naira Soghatyan	June 16, 2020, 7:24pm	No
21	The Silverstein Law Firm	Esther Kornfeld	June 16, 2020	No
22	The Silverstein Law Firm	Robert Silverstein	June 16, 2020	No
23		Dev Bhalla	June 16, 2020	No
24	Fisher & Talwar	J. Jamie Fisher	June 16, 2020	No
25		Melissa Hebert	June 17, 2020	No
26		Jasmine Lee	June 18, 2020	No
27	The Silverstein Law Firm	Robert Silverstein	June 19, 2020	No
28		Sheri Davis	June 28, 2020	No
29		Tina Pool	June 28, 2020	No
30	The Silverstein Law Firm	Veronica Lebron	June 30, 2020	No
31	The Silverstein Law Firm	Robert Silverstein	June 30, 2020	No

## Responses to Comment Letters Received

**Letter 1**, from Veronica Lebron of the Silverstein Law Firm, is an email dated April 13, 2020, requesting inclusion of Letter 2 in the record of proceedings for the City’s Environmental Justice Element of the General Plan (General Plan Amendment (GPA) 2020-001), and the amendment of the Land Use Element of the General Plan to clarify existing population density and building intensity allowances for all land use designations (GPA 2020-002). The City has done so. Letter 1 does not address or raise any environmental issues related to the IBEC EIR.

**Letter 2**, from Robert Silverstein of the Silverstein Law Firm is a letter dated April 13, 2020, submitting comments concerning the City Planning Commission hearing scheduled to occur that same date. At that hearing, the City Planning Commission’s agenda included proposals to make recommendations to the City Council concerning (1) adopting a General Plan Environmental Justice Element (GPA 2020-001), and (2) adopting certain amendments to the General Plan Land Use Element (GPA 2020-002). The letter requests notice, objects to the proposals, and asks the City to cancel the hearing. The comments are based largely on the COVID-19 pandemic and resulting challenges concerning public hearings. The letter also states that the proposed actions are not exempt from CEQA. The comments do not address the IBEC, or raise any environmental issues related to the IBEC EIR. The City has added the commenter to its list of persons receiving notice. In order to provide additional opportunities for public comment, the Planning Commission held an additional hearing on the proposed General Plan amendments on May 6, 2020. With respect to COVID-19, please see Response to Comment Silverstein-5 in Exhibit A, below.

**Letter 3**, from Veronica Lebron of the Silverstein Law Firm, is a public records request pursuant to the California Public Records Act (CPRA) (Government Code §6250, et. seq.) related to (1) public works, construction, or improvements on South Prairie Avenue between 10200 to 10212 South Prairie Avenue or within 300 feet to the north or south; (2) the proposed IBEC Project proposed signage that would be used in connection with events at the Proposed Project; and (3) the previously proposed Billboard Project (which the City is no longer processing). Please see Responses to Comments Silverstein-1, Silverstein-2, and Silverstein-41 in Exhibit A, below. Letter 3 does not address or raise any environmental issues related to the IBEC EIR.

**Letter 4**, from Veronica Lebron of the Silverstein Law Firm, is an email conveying Letter 5 to the City. Letter 4 does not address or raise any environmental issues related to the IBEC EIR.

**Letter 5**, from Robert Silverstein of the Silverstein Law Firm, identifies his representation of the owners of 10212 South Prairie Avenue, and requests notice of all hearings and determinations related to the Proposed IBEC Project. The letter raises objections the video quality of the City’s recording of public hearings and meetings that the commenter asserts are related to the Proposed IBEC Project, including meetings of March 24, 2020, and August 15, 2017. The City notes that no public hearings related to the Proposed IBEC Project occurred on those dates. The letter also asserts, without specificity, that the videos have been edited. The City disagrees with this assertion. The City notes further that under PRC §21177(a), a claim cannot be raised in litigation under CEQA “unless the alleged grounds for non-compliance with this division were presented to the public agency...during the public comment period provided by this division or prior to the close of the public hearing on the project before the issuance of the notice of determination.” The commenter’s generalized reference to poor video quality (particularly at meetings during which no hearings on the Proposed IBEC Project were held and no approvals of the Proposed IBEC Project were considered) is insufficient to inform the City of the reasons for this claim. For this reason, the comment does not provide the City with sufficient specificity to enable the City to respond.

However, to the extent the City can glean the meaning of the commenter’s statement, Letter 5 does not address or raise any environmental issues related to the IBEC EIR. Separately, with respect to the commenters’ non-specific allegation of City liability due to an alleged spoliation of evidence (an allegation with which the City disagrees), the City calls the commenter’s attention to the holding in *Lueter v. State of California* (2002) 94 Cal.App.4th 1285, 1293-1300 [recounting California Supreme Court and Court of Appeal cases holding that there is no separate tort for spoliation of evidence].

**Letter 6**, from Veronica Lebron of the Silverstein Law Firm, requests the inclusion of Letter 7 in the administrative record for the Proposed IBEC Project, as well as in the records for General Plan Amendments 2020-001 and 2020-002. Letter 6 does not address or raise any environmental issues related to the IBEC EIR.

**Letter 7**, from Robert Silverstein of the Silverstein Law Firm, is a May 26, 2020, letter following up on the author’s April 13, 2020, letter. Letter 7 addresses proposals to (1) adopt a General Plan Environmental Justice Element (GPA 2020-001), and (2) adopt certain amendments to the General Plan Land Use Element (GPA 2020-002). The letter requests notice, makes procedural objections, states that the proposed amendments are not exempt from CEQA, and objects to the proposed amendments. Letter 7 does not address or raise any environmental issues related to the IBEC EIR, except that the letter states that the proposed amendments are part of the IBEC, and therefore should be considered as part of the IBEC. With respect to such claims, please see Responses to Comments Silverstein-41 and Silverstein-42 in Exhibit A, below.

Letter 7 also states that the General Plan Land Use Element amendments under consideration are the same as the General Plan Land Use Elements Proposed as part of the IBEC proposal. This statement is incorrect. The General Plan Land Use Element amendments are not specific to the IBEC Project Site; rather, the amendments apply City-wide. In addition, the General Plan Land Use Element amendments are not related to, and are not a prerequisite to considering, the Proposed IBEC Project. For example, the amendments correlate residential land-use densities with population densities. The Proposed IBEC Project does not include residential uses. Similarly, the General Plan Land Use Element amendments contain building intensities, expressed as “building intensity ratios,” for commercial, industrial, and mixed uses. These ratios are based on existing setback, buffer, and building height requirements within each land-use designation; the ratios do not alter land-use policy, but incorporate existing and already binding land-use policy into the General Plan. The amendments clarify, rather than alter, existing policy. Additional information is provided in Memorandum to the City Council from the Economic and Community Development Department (June 30, 2020).

**Letter 8**, from Richard Garcia, poses several questions about specific future businesses that may be operate in the retail space planned as part of the Proposed Project. At this point, the project applicant has not committed to any specific private retail or restaurant operators, but has indicated the intent to include a LA Clippers Team Store in the plaza retail space, as well as in the arena. A second question asked whether there would be handicap parking included in the Proposed Project. Although not specifically addressed in the EIR, the Proposed Project would be required to comply with the City’s requirement for handicap parking in the design of the Proposed Project, including all parking structures (see Inglewood Municipal Code, Chapter 12, Article 19, Section 12-57 Handicapped Parking). Letter 1 does not address the EIR or raise any environmental issues.

**Letter 9**, from Veronica Lebron of the Silverstein Law Firm, is an email describing difficulty in participating in the City Council meeting of June 9, 2020, and asserting that such difficulties resulted in a violation of the Brown Act. The City Council meeting of June 9, 2020, included consideration of proposals to (1) adopt a General Plan

Environmental Justice Element (GPA 2020-001), and (2) adopt certain amendments to the General Plan Land Use Element (GPA 2020-002). The City’s actions with respect to the June 9, 2020, General Plan Amendments were subsequently rescinded. As explained above in response to Letter 7, this letter does not address or raise any environmental issues related to the IBEC EIR, except that the letter states that the proposed amendments are part of the Proposed IBEC Project, and therefore should be considered as part of the Proposed IBEC Project. With respect to such claims, please see Responses to Comments Silverstein-41 and Silverstein-42 in Exhibit A, below. The City Council conducted a further hearing concerning the proposed amendments on June 30, 2020. To the extent the comment raises concerns regarding the communications difficulties that arose at the June 9, 2020, City Council hearing, those concerns have been addressed.

**Letter 10**, from Robert Silverstein of the Silverstein Law Firm, is a June 9, 2020, letter following up on the author’s April 13, 2020, and May 26, 2020, letters. Letter 10 addresses proposals to (1) adopt a General Plan Environmental Justice Element (GPA 2020-001), and (2) adopt certain amendments to the General Plan Land Use Element (GPA 2020-002). The letter requests notice, makes procedural objections, states that the descriptions of the proposed amendments have not been stable, states that the City has not responded properly to the commenter’s prior objections to the proposed amendments, and objects to the proposed amendments. Letter 10 does not address or raise any environmental issues related to the IBEC EIR, except that the letter states that the proposed amendments are part of the IBEC, and therefore should be considered as part of the IBEC. With respect to such claims, please see Responses to Comments Silverstein-41 and Silverstein-42 in Exhibit A, below.

Letter 10 also states that the General Plan Land Use Element amendments under consideration are the same as the General Plan Land Use Elements Proposed as part of the IBEC proposal. This statement is incorrect. The General Plan Land Use Element amendments are not specific to the IBEC Project Site; rather, the amendments apply City-wide. In addition, the General Plan Land Use Element amendments are not related to, and are not a prerequisite to considering, the Proposed IBEC Project. For example, the amendments correlate residential land-use densities with population densities. The Proposed IBEC Project does not include residential uses. Similarly, the General Plan Land Use Element amendments contain building intensities, expressed as “building intensity ratios,” for commercial, industrial, and mixed uses. These ratios are based on existing setback, buffer, and building height requirements within each land-use designation; the ratios do not alter land-use policy, but incorporate existing and already binding land-use policy into the General Plan. The amendments clarify, rather than alter, existing policy. Additional information is provided in Memorandum to the City Council from the Economic and Community Development Department (June 30, 2020).

**Letter 11**, from Dev Bhalla, is written by the owners of 3838 West 102<sup>nd</sup> Street, located within the Arena Site, south of 102<sup>nd</sup> Street. The letter provides background on the business located at this site and expresses opinions about the City’s conduct of the Planning Commission hearing and about the merits of the Proposed Project. The letter requests information on the Proposed Project. This information is provided in Chapter 2, Project Description, of the EIR. The letter also requests contact information for the Mayor, Councilperson, and other members of the City staff involved in the Proposed Project. Such information is available on the City’s website at <https://www.cityofinglewood.org/directory.aspx>. Letter 10 does not address the EIR or raise any environmental issues.

**Letter 12**, from Melissa Hebert, is an email requesting the agenda for the City Planning Commission meeting of June 17, 2020. The agenda was sent to the commenter. Letter 12 does not address the EIR or raise any environmental issues.



**Letter 13**, from Naira Soghatyan of the Silverstein Law Firm, requests that the City include its content in the Administrative Record for the Proposed Project. The letter addresses issues associated with telephone access that occurred at a June 9, 2020, meeting of the Inglewood City Council. As set forth in response to Letter 9, the June 9 meeting considered matters unrelated to the Proposed Project. The comment requests that public participation be provided for in the scheduled June 17, 2020, meeting of the City Planning Commission, and that special provisions be made to accommodate the participation of the commenter. At the author’s request, the letter will be included in the Administrative Record for the Proposed Project. The City established procedures for the Planning Commission meeting to allow all interested parties to participate via telephone. Members of the public were able to participate in the Planning Commission’s hearing on June 17, 2020.

**Letter 14**, from Veronica Lebron of the Silverstein Law Firm, is an email conveying Letter 15 to the City. Letter 14 does not address or raise any environmental issues related to the IBEC EIR.

**Letter 15**, from Robert Silverstein of the Silverstein Law Firm, is a June 11, 2020, request for documents pursuant to the CPRA. Letter 15 does not address or raise any environmental issues related to the IBEC EIR. Please see Response to Comment Silverstein-2 in Exhibit A, below.

**Letter 16**, from Veronica Lebron of the Silverstein Law Firm is a June 11, 2020, e-mail that requests copies of three documents pursuant to the CPRA related to the Century Boulevard Redevelopment Plan: Ordinance No. 94-24, adopted November 22, 1994; Ordinance No. 2405, adopted July 7, 1981 (the e-mail asks for Ordinance No. 2045, but this appears to be a typographical error); and Ordinance No. 93-18, adopted July 13, 1993 (the email states the ordinance was adopted on June 29, 1993). The e-mail also requests copies of CEQA analyses prepared in connection with these ordinances. The City has responded to this request by providing the documents, or by stating that the documents are in the process of being gathered, at which point they will be provided. The City of Inglewood Redevelopment Project Areas and related plans are addressed in the EIR in Section 3.10, Land Use and Planning, pages 3.10-26 to 3.10-28. Letter 16 does not address the EIR or raise any environmental issues. Please see Response to Comment Silverstein-2 in Exhibit A, below.

**Letter 17**, from Kevin H. Brogan of Hill, Farrer & Burrill LLP, is written by representatives of the owners of 3915 West 102<sup>nd</sup> Street, within the Arena Site. The letter expresses opinions about several proposed actions that are identified in the Draft EIR, Project Description, Chapter 2, Section 2.6. In addition to listing the proposed actions, including proposed changes to General Plan designations and zoning, and the proposed vacation of portions of West 101<sup>st</sup> and 102<sup>nd</sup> Streets, the Draft EIR states that “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, and the imposition of adequate controls necessary to ensure that the public purpose and use for which they were acquired are protected” (see Draft EIR page 2-89). No such determination has been made by the City. Letter 17 does not address the content of the EIR or raise any environmental issues.

**Letter 18** is a letter from David Pettit, a senior attorney with the Natural Resources Defense Council. Mr. Pettit also submitted a letter commenting on the Draft EIR (see Final EIR, Chapter 3, Letter NRDC, pages 3-351 to 3-356, and Responses to Comments NRDC-1 through NRDC-12, pages 3-357 to 3-391). Letter 18 addresses two aspects of the GHG emissions analysis in the EIR. First, the letter identifies a concern that the City’s approach to the calculation of net new GHG emissions in the EIR was intended to allow the use of a “future baseline as emissions standards and the like are tightened” in an attempt to “take credit for circumstances it has nothing to do

with, and that would occur whether the project is ever built or not – such as tightened auto GHG emission standards over time.” The commenter had earlier expressed concern that the baseline selected by the City was thereby intended to reduce the Proposed Project’s GHG emissions mitigation requirement.

The City wishes to clarify and emphasize that the approach utilized by the City in the EIR to calculate GHG emissions using annually-adjusted GHG emissions factors is not intended to, and does not, reduce the Proposed Project’s GHG mitigation requirement. As detailed below, the City’s approach ultimately would require the Proposed Project to mitigate approximately 166,000 MT of CO<sub>2</sub>e *more* than the Proposed Project would otherwise have been required to mitigate if the City had selected the static GHG emissions baseline approach suggested by the commenter. For these reasons, the City believes that the approach properly utilized in the EIR and the desired outcome expressed by the commenter – full mitigation of a Project’s greenhouse gas emissions – are in accord. Just as importantly, for the reasons indicated below, the City’s use of the approach advocated by the commenter would result in a less conservative calculation of net new GHG emissions generated by the Proposed Project.

The Draft EIR calculations of total or gross project-generated GHG emissions over the 30-year analysis period properly use emission factors that account for anticipated improvements in emissions from mobile and stationary sources based on reasonably foreseeable implementation of new technology and established regulatory emissions requirements that become more stringent over time. As shown in Table 3.7-5 on page 3.7-39 of the Draft EIR, these GHG emissions factors become lower over time, resulting in lower gross project-generated GHG emissions estimates for future years.

Net new GHG emissions for the Proposed Project are derived by subtracting the baseline GHG emissions calculated in the EIR from the total gross project-generated GHG emissions. The calculation of net new GHG emissions provided in the Draft EIR properly applies the same GHG emissions factors that become lower over time to calculate baseline GHG emissions and gross project-generated GHG emissions over the 30-year analysis period.

The use of a “static baseline” approach to calculate net new project generated GHG emissions would require that fixed GHG emissions factors (e.g., 2018 emissions factors based on the date the NOP was issued) be used to calculate baseline GHG emissions for the 30-year analysis period for the Proposed Project. This would result in higher baseline GHG emissions and lower net new GHG emissions for the Proposed Project. Under the static baseline approach recommended by the commenter, calculations of the gross Proposed Project GHG emissions would account for future reductions in emissions due to evolving and improving technology, but the calculation of baseline GHG emissions would not. Essentially, calculating baseline GHG emissions using a static emissions factor would allow the Proposed Project to get credit for improvements in GHG emissions that would occur regardless of whether the Proposed Project is ever built. Under the approach used by the City in the Draft EIR, both the baseline and the gross Proposed Project emissions for any given analytical year are based on the same emissions factors, which results in higher net new emissions attributed to the Proposed Project, and thus a higher mitigation requirement than under the static baseline. Thus, the approach taken by the City in the Draft EIR is more conservative and requires more mitigation than the approach recommended by the commenter. As discussed in Final EIR Response to Comment NRDC-5, Mitigation Measures 3.7-1(a) and 3.7-1(b) would require achievement of net zero GHG emissions based on the emissions accounting provided in the Annual GHG Verification Report that would be provided to the City and to the California Air Resources Board.

The comment is correct that the calculations are complicated. That is an unavoidable byproduct of the attempt to characterize GHG emissions years into the future, while taking into account changes in regulatory requirements, and other factors. The bottom line, however, is that the approach taken in the EIR results in higher estimated net new GHG emissions from the Proposed Project, and therefore more GHG emissions reductions must be achieved, in order to meet the no net new GHG emission threshold, as compared to the approach endorsed by the comment.

Second, the letter cites a decision issued by the Fourth District Court of Appeal on June 12, 2020 – *Golden Door Properties, LLC v. County of San Diego* (2020) – Cal.App.5th – [slip op. dated June 12, 2020]. In that decision, the Court ruled that the mitigation measure adopted by the County was inadequate to address GHG emissions from projects that were not included in the County’s Climate Action Plan, and thus not included in the County’s inventory of GHG emissions for current and future horizon years. The decision raises questions about the use of GHG emissions offsets as CEQA mitigation. The decision spans 132 pages, is both legally and factually complex, and arises out of a lengthy administrative and legal process that has occurred over nearly a decade. In addition, the Court emphasizes that its decision is narrow, and is not intended to question the use of offsets as GHG mitigation generally, stating: “To be abundantly clear, our holdings are necessarily limited to the facts of this case, and in particular, [Mitigation Measure]-GHG-1. Our decision is not intended to be, and should not be construed as blanket prohibition on using carbon offsets—even those originating outside of California—to mitigate GHG emissions under CEQA.” (Slip op., p. 4.)

The GHG mitigation measures incorporated into the Proposed Project differ substantially from the mitigation measure at issue in the *Golden Door* case. In particular, under Mitigation Measure 3.7-1, the Proposed Project must take substantial steps to reduce the GHG emissions through required on-site GHG emissions reduction measures, as well as required local off-site reduction measures. The project applicant may rely on GHG emissions offsets in addition to those required on-site and off-site local measures. The measure also commits the Proposed Project to a specific standard that must be achieved: no net new GHG emissions. To the extent the applicant relies on GHG emissions offsets to achieve this standard, those offsets must be real, quantifiable, additional, verifiable, permanent and enforceable. Mitigation Measure 3.7-1 establishes an annual monitoring mechanism to ensure that the no-net-new standard is achieved. For these reasons, the City believes that the basic structure of Mitigation Measure 3.7-1 meets the standards set forth in the *Golden Door* decision. The City has, however, considered whether refinements to Mitigation Measure 3.7-1 are warranted in light of *Golden Door* decision. Refinements to this measure in response to this comment are included in the MMRP, which, among other changes enhance the enforceability of the mitigation measure and restrict the use of offset credits generated outside the United States to further ensure that the Proposed Project’s off-site mitigation proposals are each additional and enforceable. The refinements to this measure are included in the MMRP presented to the City Council for its consideration. While these refinements may not be legally necessary, City staff believes they are appropriate in order to remove any doubt about whether Mitigation Measure 3.7-1 meets the standards set forth in the *Golden Door* decision.

**Letter 19**, from Naira Soghatyan of the Silverstein Law Firm, raises several issues, including (1) difficulties in public access to the City Council hearing of June 9, 2020, (2) objections to the June 9, 2020, adoption of CEQA Categorical Exemptions and approval of GPAs 2020-001 and 2020-002, as well as requests to recirculate the IBEC Draft EIR, and (3) objection to the City’s approval of its Citywide Permit Parking Districts Program Ordinance, and an assertion that the ordinance was improperly segmented from the Proposed IBEC Project.

The issues related to the conduct of the City Council meeting on June 9, 2020, are the same as those raised by the same law firm in Letter 9, above. See the City’s response to Letter 9, above.

The objections to the adoption of CEQA Exemptions and approval of GPAs 2020-001 and 2020-002, are the same as those addressed by the same commenter in Letter 7, above. See the City’s response to Letter 7, above.

The objection to the City’s approval of its Citywide Permit Parking Districts Program Ordinance, and assertion that the ordinance was improperly segmented from the Proposed IBEC Project are summaries of issues addressed more thoroughly in Letter 22 and Exhibit A, below. Please see Response to Comment Silverstein-17 in Exhibit A, below.

The issues raised in Letter 19 are procedural in nature and are not germane to the content, substance, and conclusions of the IBEC EIR. They do not identify significant new information pursuant to CEQA Guidelines §15088.5, and thus do not rise to the type of issue that would require recirculation of any part of the IBEC Draft EIR.

**Letter 20**, from Naira Soghatyan of the Silverstein Law Firm, addresses the conduct of the City Council meeting on June 16, 2020. At this hearing, the City Council considered setting a date to consider amending its General Plan to include an Environmental Justice Element (GPA 2020-001) and to amend the General Plan Land Use Element (GPA 2020-002). Based on communications difficulties at this hearing, on June 30, 2020, the City Council rescinded its approval of these amendments. The City Council conducted a further hearing on the proposed amendments. The author did not appear at the hearing. Another member of this law firm – Robert Silverstein – participated at this hearing. Following the public hearing, the City Council approved the amendments. The amendments are not a component of the Proposed IBEC Project. Letter 20 does not address the IBEC EIR. Please see Responses to Comments Silverstein-41 and Silverstein-42 in Exhibit A, below.

**Letter 21**, from Esther Kornfeld of the Silverstein Law Firm, requests inclusion of Letter 22, including all exhibits and related links, in the administrative record for the Proposed IBEC Project. The City included the requested materials in the administrative record for the Proposed Project. Letter 21 does not address the EIR or raise any environmental issues.

**Letter 22**, from Robert Silverstein of the Silverstein Law Firm, is a 63-page letter with 2,363 pages of attached exhibits, and raises a number of objections to the Proposed IBEC Project, as well as issues related to the content of the Draft and Final EIRs, as well as procedures undertaken by the City in its consideration of the Proposed IBEC Project. More specifically, the myriad issues raised in the letter include assertions that (1) the City failed to respond to requests for documents pursuant to the CPRA, (2) the administrative record is improper, (3) the City gave improper notice and is “fast-tracking” the Proposed Project, (4) the Final EIR responses were inadequate, (5) new information makes the Draft and Final EIRs inadequate, (6) the City has improperly segmented (or piecemealed) the environmental analysis in the Draft EIR, (7) the City has illegally pre-committed itself to the approval of the Proposed Project, (8) the Draft EIR fails to adequately address impacts of the Proposed Project on schools, (9) the Mitigation Monitoring and Reporting Program fails to meet legal requirements, (10) the proposed amendments to the Inglewood International Business Park Specific Plan, (11) the Proposed Project actions would result in a violation of the Subdivision Map Act and the Surplus Land Act, and (12) the proposed Disposition and Development Agreement is inconsistent with the law. The full letter is bracketed and responded to in detail in Exhibit A, pages A-1 through A-63 of this memorandum.

In responding to the comments provided in this letter, the City has at points provided additional clarification or expanded upon information and analyses provided in the Draft and/or Final EIRs. For the most part, the comments raise substantive issues about the Draft EIR that were considered and addressed in the Final EIR, or

raise procedural issues regarding the City’s implementation of CEQA or non-CEQA aspects of the City’s process to review and consider the merits of the Proposed Project. The comments and responses do not constitute “significant new information” as defined in CEQA Guidelines section 15088.5(a), in that they do not: (1) identify any significant impacts that were not disclosed in the Draft EIR, (2) identify any impacts that are substantially more severe than disclosed in the Draft EIR, (3) identify any feasible mitigation measures or alternatives that were not identified and required of the Proposed Project to avoid or substantially lessen significant impacts, or (4) establish that the Draft or Final EIRs were so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. Therefore, neither the Draft EIR nor the Final EIR require circulation for additional review and comment. Please see the detailed responses to comments in Letter 22 in Exhibit A of this memorandum.

**Letter 23**, from Dev Bhalla, raises a number of questions about the Proposed Project, including the affordability of tickets to events at the Proposed Project arena, why the project site boundaries were set as proposed, and whether rezoning relates to his property (3838 West 102<sup>nd</sup> Street).

The issue of affordability of tickets at the Proposed Project arena was addressed in the Final EIR Response to Comment NRDC-3 which explains that the Proposed Project would provide entertainment opportunities for Inglewood residents across the economic spectrum. The response notes that in addition to a range of ticket prices for seats in different parts of the proposed arena, the project applicant and the City have negotiated a Draft Development Agreement that includes “public benefits” package of \$100 million, including a number of provisions that would have benefits to the local community irrespective of the ability to afford tickets to events at the Proposed Project. Among other things, the Draft Development Agreement would require the dedication of 100 general admission tickets to every LA Clippers basketball regular season home game for use by a community group at no charge. Another provision would allow the use of the Arena by the City, local schools, youth athletic programs, or local community-based charitable organizations designated by the City for up to 10 days per year on days that the Arena or surrounding facilities are available. These public benefits, among others, are listed at Exhibit C to the proposed Development Agreement.

The project applicant and the City identified a proposed configuration of the Project Site that would involve the disposition of property owned by the City and the Successor Agency to the City of Inglewood Redevelopment Agency, the vacation of portions of City-owned streets, combined with acquisition of limited number of privately owned non-residential properties (through voluntary sales and/or potential condemnation actions if the City, in its sole and absolute discretion, determines to acquire such properties).

With respect to parcels on the proposed West Parking Garage Site proposed to be rezoned for consistency with the General Plan Land Use Element, those are parcels owned by the City or Successor Agency, and that rezoning would not involve the commenter’s property.

**Letter 24**, from J. Jamie Fisher of Fisher & Talwar, expresses opposition to the Agenda Items 5(A) through 5(F) on the June 17, 2020, City Planning Commission agenda. Letter 24 does not address or raise any environmental issues related to the IBEC EIR.

**Letter 25**, from Melissa Hebert, is an email requesting the staff report related to the Proposed Project for the City Planning Commission meeting of June 17, 2020. The staff report was sent to the commenter. Letter 25 does not address the EIR or raise any environmental issues.

**Letter 26**, from Jasmine Lee, sent on behalf of Charles Lee, property owner of California Prairie Plaza (10300 South Prairie Avenue), immediately south of the Project Site on the east side of South Prairie Avenue. The comment asks four questions, addressed below:

1. Does the Project Site overlap with the commenter’s property? No, the Project Site is immediately north of the 10300 South Prairie Avenue property, and the properties abut only at the northwest corner of the commenter’s property.
2. How will businesses at the 10300 South Prairie Avenue site be affected by the construction and project? As described in the Draft EIR, Chapter 2, Project Description, during the first phase of construction a 12- to 15-foot high sound barrier would be constructed that would separate the Project Site from the commenter’s property. Draft EIR Chapter 3 provides detailed analysis of the environmental impacts of the Proposed Project on surrounding properties, including the commenter’s property. Please see Section 3.1 for a discussion of aesthetics, light and glare, and shade and shadow; Section 3.2 for a discussion of air quality, and specifically local emissions and health risks; Section 3.11 for a discussion of noise; and Section 3.14 for a discussion of Transportation and Circulation. Each of these discussions, as appropriate, includes discussion of impacts during construction, as well as impacts under a variety of operational conditions, ranging from every day conditions without arena events, through a variety of arena events including sold out basketball games and major concerts.
3. Who is the point person at the City to whom questions should be addressed? As noted in Draft EIR Chapter 1, and elsewhere in City notices related to the Proposed Project, the contact at the City of Inglewood is Mindy Wilcox, Planning Manager, Department of Economic and Community Development, One West Manchester Boulevard, 4<sup>th</sup> Floor, Inglewood, CA, 90301. Questions can also be submitted to the City’s website at: [ibecproject@cityofinglewood.com](mailto:ibecproject@cityofinglewood.com).
4. Is there a start date? Table 2-5, Draft EIR page 2-83 provides a detailed schedule for the construction of the Proposed Project, starting in July 2021 with anticipated completion and opening of the Proposed Project in October 2024.

**Letter 27**, from Robert Silverstein of the Silverstein Law Firm, acknowledges receipt of prior communications with the City staff, and raises questions about the City’s determination that certain documents are privileged communications. The letter also requests information on the anticipated dates for the City Council’s consideration of the EIR and the Proposed Project entitlements. Letter 27 does not address the EIR or raise any environmental issues. Please see Response to Comment Silverstein-4 in Exhibit A, below.

**Letter 28**, from Sheri Davis, a resident of Inglewood, expresses concerns about the ability of residents to view and participate in City Council meetings that are on line. While the unprecedented circumstances surrounding the COVID-19 pandemic have modified the method by which the City’s Council meetings are conducted, consistent with the Governor’s executive orders the City has provided multiple ways for members of the public to observe and participate in Council meetings while observing social distancing recommendations and public health orders issued by the Los Angeles County Department of Public Health. These measures are detailed on each City Council agenda.

The letter also expresses concern about increased traffic and other environmental impacts of the Proposed Project, and questions the benefits, such as increased property and sales taxes, that may accrue to Inglewood.

The impacts of the Proposed Project on traffic and circulation are thoroughly described in the Draft EIR, Section 3.14. The commenter refers to concerns about “residents forced out of their housing and closing of small businesses,” an issue that is addressed in Draft EIR Section 3.12, Population, Employment and Housing. On Draft EIR, page 3.12-15, it is explained that because the Project Site does not include any residential units, “no residents would be displaced as a result of the Proposed Project.” The Draft EIR does acknowledge that existing businesses, including a fast-food restaurant, a motel, a light manufacturing/warehouse facility, a warehouse, and a commercial catering business, would be displaced by the Proposed Project, but notes that “[b]ased on the availability of land suitable for relocation, these businesses should be able to locate elsewhere in the region.”

Regarding benefits to the City of Inglewood, as described in the City’s staff report for the June 17, 2020, Planning Commission meeting, the Proposed Project would generate substantial new revenues to the City, including property taxes, sales taxes, transient occupancy taxes, and other related revenues, in excess of the costs to the City. More specifically the Proposed Project would generate \$12.9 million in one-time tax revenues related to construction, and a net increase in tax revenues of approximately \$4.4 million per year to the City and approximately \$2.3 million per year to the Inglewood Unified School District.

Further, as described in the Final EIR (see Response to Comment NRDC-3) and the June 17, 2020, staff report, the project applicant and the City have negotiated a “public benefits” package of \$100 million. If the Proposed Project is approved by the City Council, these benefits would include the creation of local jobs and implementation of workforce equity programs, up to \$80 million in programs for the construction of affordable housing and assistance for first-time homebuyers and renters; the balance of \$20 million would fund programs for students, families and seniors. In addition, the Draft Development Agreement includes a number of provisions that would have benefits to the local community irrespective of the ability to afford tickets to events at the Proposed Project. Among other things, the Draft Development Agreement would require the dedication of 100 general admission tickets to every LA Clippers basketball regular season home game for use by a community group at no charge. Another provision would allow the use of the Arena by the City, local schools, youth athletic programs, or local community-based charitable organizations designated by the City for up to 10 days per year on days that the Arena or surrounding facilities are available. The elements of this package would be part of the entitlement package presented to the City Council for its consideration.

Letter 28 does not address the EIR or raise any environmental issues.

**Letter 29**, from Tina Pool, expresses opposition to the Proposed Project. While the comment requests the City to “rescind the approval” of the Proposed Project, it should be noted that the City has been in the process of conducting environmental and other review of the Proposed Project for the last two and one half years, and has not yet conducted a City Council hearing related to the merits of the Proposed Project, nor has the City approved the Proposed Project. Letter 29 does not address the EIR or raise any environmental issues.

**Letter 30**, from Veronica Lebron of the Silverstein Law Firm, is an email conveying Letter 31 to the City. Letter 30 does not address or raise any environmental issues related to the IBEC EIR.

**Letter 31**, from Robert Silverstein of the Silverstein Law Firm, addresses a range of issues related to the City’s consideration of proposed GPAs 2020-001 and 2020-002, and related CEQA Exemptions. The only issue that addresses the IBEC EIR is a conclusory assertion that the two GPAs are part of the Proposed IBEC Project, and thus have been “illegally piecemealed” by not being addressed in the IBEC EIR. These same issues were raised in the commenter’s letter of June 16, 2020 (see Letter 22), and are discussed in Letter 22 Responses to Comments

Silverstein-41 and Silverstein-42 in Exhibit A, below. The conclusion of those responses is that under CEQA, including relevant case law, the City is neither required to analyze the General Plan Environmental Justice Element (GPA 2020-001) or the General Plan Land Use Element amendments (GPA 2020-002) as a component of the IBEC project, nor analyze the IBEC as a component of GPAs 2020-001 or 2020-002. Letter 31 does not otherwise address the IBEC EIR or raise any environmental issues related to the Proposed IBEC Project.

## **Analysis and Conclusion**

We have reviewed all of the attached correspondence for issues that may pertain to the EIR. All potential environmental issues raised in these comment letters were addressed in the Inglewood Basketball and Entertainment Center Project EIR. The comments addressed in this memorandum do not identify any environmental effects beyond those described in the Inglewood Basketball and Entertainment Center Project EIR, and no further analysis is required.

## **Exhibits**

- A. Detailed Responses to Comment Letter 22 .....A-1
- B. Additional Letters and Emails with Comments on the Proposed IBEC Project .....B-1



**EXHIBIT A**  
**DETAILED RESPONSES TO LETTER 22**

**EXHIBIT A  
DETAILED RESPONSES TO COMMENT LETTER 22**

**Letter  
Silverstein  
Response**      **Robert Silverstein, Letter**  
June 16, 2020

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- Silverstein-1      As requested, the City has included the commenter, as well as Kenneth and Dawn Baines, on the list of interested persons to receive notices related to the Proposed Project.
- The comment suggests that the Billboards Project, previously proposed by WOW Media, and the City’s Inglewood Transit Connector project are “components” of the Proposed Project. This suggestion is incorrect. The Billboard Project was proposed in June 2019, over a year after the publication of the NOP for the Proposed Project, and sponsored by entities unrelated to the project applicant. The Billboards Project was not a component of the Proposed Project, and as explained in the Final EIR, has been withdrawn and is no longer being processed by the City of Inglewood. Please see Response Silverstein-41.
- The City’s Inglewood Transit Connect (ITC) project is also a separate and independent project and is not a component of the Proposed Project. The NOP for the ITC project was published in July 2018, over six months after the publication of the NOP for the Proposed Project. As a proposed transit system that would provide connections from the South Prairie Avenue corridor to the Metro LAX Crenshaw line Downtown Inglewood Station, the proposed ITC, if developed, could be used by employees and patrons of the Proposed Project, along with serving patrons and employees of The Forum, Sofi Stadium, the mixed uses being developed within the Hollywood Park Specific Plan, and other nearby uses and residences. The Proposed Project would not rely upon the construction and operation of the proposed ITC; the Proposed Project’s TDM program provides for a shuttle system to provide connectivity from the Proposed Project to multiple Metro light rail stations on both the LAX Crenshaw line and the Green line. The analysis presented in Section 3.14 of the EIR does not assume the presence of the proposed ITC, although in compliance with the requirements of CEQA to account for all reasonably foreseeable cumulative projects, the proposed ITC is included on the list of Cumulative Projects included in Table 3.0-2, in Section 3.0 of the Draft EIR. Please see Response Silverstein-41.
- The City will add the commenter and Kenneth and Dawn Baines to the list of interested parties requesting notices related the previously proposed Billboard Project and the proposed ITC project.
- The comment states in a footnote that Assembly Bill (AB) 987 is unconstitutional. The comment does not state the reasons why, in the commenter’s view, the AB 987 statute is unconstitutional. For this reason, it is not possible to respond to this comment. The City notes further that under Public Resources Code (PRC) §21177(a), a claim cannot be

**EXHIBIT A  
DETAILED RESPONSES TO COMMENT LETTER 22**

raised in litigation under the California Environmental Quality Act (CEQA) “unless the alleged grounds for non-compliance with this division [CEQA] were presented to the public agency orally or in writing by any person during the public comment period provided by this division or before the close of the public hearing on the project before the issuance of the notice of determination.” The comment’s general reference to the unconstitutionality of AB 987 are insufficient to inform the City of the reasons for this claim. For this reason, the comment does not provide the City with sufficient specificity to enable the City to respond. (See *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2020) 47 Cal.App.5th 588, 618-619; *Mani Brothers Real Estate v. City of Los Angeles* (2007) 153 Cal.App.4th 1385, 1394 [petitioner must raise “exact issue” with agency in order to be able to assert claim in litigation].)

Silverstein-2

The comment states that the City has not responded to California Public Records Act (“CPRA”) requests submitted by the author or others in his law firm, citing CPRA requests submitted on April 22, April 23, and May 28, 2020. The comment later cites subsequent CPRA requests dated May 8, June 4, June 11 and June 12, 2020, although it is unclear whether or how the comment refers to these other requests. The comment states that the City’s incomplete responses to these requests has limited the author’s ability to participate in the environmental review process for the Proposed Project.

Some of the CPRA requests listed in this comment do not address the Proposed Project. Others do. The following discussion summarizes the status and relevance of these requests:

- On April 22, 2020, the City received an e-mail from the author’s law firm containing a CPRA request concerning various categories of documents.

First, the April 22 e-mail requested documents concerning improvements on South Prairie Avenue between or within 300 feet of 10200-10212 South Prairie Avenue. These improvements consist of public works projects to (1) install fiber-optic cable, and (2) resurface South Prairie Avenue. Neither improvement is related to the Proposed Project. See Response to Comment Silverstein-41. The City is gathering the documents responsive to this request. Responsive, non-privileged documents will be provided.

Second, the April 22 e-mail requests documents related to a proposal by WOW Media to construct and operate billboards. The billboards project is not part of the Proposed Project. See Response to Comment Silverstein-41. The City is gathering the documents responsive to this request. Responsive, non-privileged documents will be provided.

Third, the April 22 e-mail requests documents concerning signage at the Proposed Project. All documents that are part of the record of proceedings for the Proposed

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Project, including those related to signage, are available to at the record of proceedings web site established by the City. The web site is located at:

<http://ibecproject.com/>

The documents pertaining to signage at the Proposed Project consist primarily of the draft development agreement and draft design guidelines. Both documents were presented to the City Planning Commission for its hearing on June 17, 2020. The draft development agreement and design guidelines are attached to the staff report to the Planning Commission. The June 17 agenda packet is available on the City's web site. The June 17 agenda packet is also available on the record of proceedings web site for the Proposed Project.

- On April 23, 2020, the City received a letter from the author's law firm. The letter included a CPRA request concerning the City Council's hearing on March 24, 2020, pertaining to the Proposed Project. The City responded to this request by letter dated April 30, 2020.
- On May 8, 2020, the City received an e-mail from the author's law firm supplementing its April 22 e-mail and April 23 letter. Information concerning the April 22 e-mail is set forth above. With respect to the portion of the May 8 e-mail supplementing the April 23 letter, the City had already responded to this request on April 30, 2020.
- The comment references a CPRA request dated May 28, 2020. The City has not received a request dated May 28. The date may be a typographical error. The correct date may be May 8. See above.
- On June 4, 2020, the City received an e-mail from the author's law firm requesting documents related to the March 24 City Council hearing. The City responded to the request related to the March 24 City Council hearing in a letter dated April 30, 2020. The e-mail also requests video and audio recordings of the March 24 hearing. The e-mail also requests signed copies of documents. The City has communicated with the commenter on this issue and is continuing to gather information responsive to this request. Responsive, non-privileged documents will be provided.
- On June 11, 2020, the City received a letter from the author's law firm requesting certain documents pertaining to the Proposed Project site. The letter lists 23 categories of documents. Some of these categories request documents pertaining to the Proposed Project. These documents are available at the dedicated web site, at which the City is compiling, on an ongoing basis, the Proposed Project's record of proceedings. This web site is located at <http://ibecproject.com/>. Other categories of documents pertain to the Proposed Project, but they are not part of the record of proceedings because they are subject to the attorney/client privilege or other privilege, or are otherwise not public records; in those instances, the City will neither

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provide the documents nor post them to the dedicated web site. Other categories of documents requested in the letter are not relevant to the Proposed Project; in those instances, the City is gathering the recordings and documents responsive to these requests, and responsive, non-privileged documents will be provided.

- On June 12, 2020, the City received a letter from the author's law firm requesting information concerning the City Council's June 9, 2020, hearing. At that hearing, the City Council considered whether to adopt resolutions and findings to approve certain technical amendments to the General Plan Land Use Element, and to approve a General Plan Environmental Justice Element. These actions are not part of the Proposed Project. See Responses to Comments Silverstein-41 and Silverstein-42. The City is gathering the documents responsive to this request. Responsive, non-privileged documents will be provided. The City also notes that the documents are, and have been, available as attachments to the City Staff Report to the City Council for its consideration at the June 9, 2020, hearing.

The comment requests that the City take no decision on the Proposed Project until the requested documents have been provided. The City is not required to suspend action on a proposal based on the status of CPRA requests on the proposal under consideration that have been submitted. Moreover, as noted above, some of the CPRA requests seek documents that are not related to the Proposed Project.

The comment states that the author may seek to augment the record. Whether augmentation of the record with a particular document is appropriate cannot be addressed in the abstract. If a given document falls within the criteria for inclusion in the record (Pub. Resources Code, § 21167.6, subd. (e)), then the City will include that document in the record. If the commenter proposes to augment the record with certain documents, then the City will consider the proposal at the time that it is made. As noted above, however, some of the CPRA requests cited in the comment do not pertain to the Proposed Project, or pertain to documents that are not within the scope of the record of proceedings because they are privileged or otherwise excluded from the record. For this reason, the documents responsive to these requests would not be part of the record for the Proposed Project. Those that are relevant to the Proposed Project have already been included in the record, unless there is a specific reason, such as a privilege, why the document would not be included in the record.

The comment appears to be designed to suggest that the City has prevented the author, its clients, and the public from obtaining information concerning the Proposed Project. The City disagrees with this suggestion. The City has established a dedicated web site for the Proposed Project: <http://ibecproject.com/>. The City has maintained a contemporaneous, indexed copy of the record available on this web site throughout the environmental review process for the Proposed Project. The City has also sent notices and distributed environmental documents for the Proposed Project as required by CEQA. The author, the

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author's clients, and the public have therefore had unusually abundant opportunities to review documents concerning the Proposed Project. Nevertheless, neither the author nor its clients submitted timely comments on the Draft EIR.

Silverstein-3 The comment states that the author's firm downloaded documents from the City's web site on May 15, 2020, shortly after the City posted its agenda for the City Council's May 19, 2020, agenda, but the hyperlink to the staff report was disabled shortly thereafter.

This statement is correct. When the City initially posted the City Council's agenda packet for the May 19, 2020, Council hearing, the documents posted with the agenda included materials that are subject to the attorney/client privilege. The materials were marked as subject to this privilege. The inclusion of these materials as attachments to the staff report was a clerical error. As soon as this error was discovered, the materials were removed from the hyperlinked agenda packet. The disclosure of these materials was inadvertent and did not waive the attorney/client privilege. The author has been notified of these facts. The materials included in the administrative record for the Proposed Project redact this privileged information. The agenda item originally scheduled for the May 19, 2020, City Council hearing was rescheduled for a later hearing.

Silverstein-4 The comment states that the City has deprived the public of the opportunity to review the entire administrative record. This statement is incorrect. The entire record is available at the dedicated web site established for the Proposed Project:

<http://ibecproject.com/>

The City has not posted to the record those documents that are either (1) not required to be part of the record of proceedings, or (2) are subject to non-disclosure as a result of a recognized privilege. That is appropriate; the requirement to prepare the agency's record does not trump privileges or non-disclosure requirements that otherwise apply. (See, e.g., *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 216, 218 [privileged archaeological information in an EIR did not need to be disclosed]; *California Oak Foundation v. County of Tehama* (2009) 174 Cal.App.4th 1217, 1221 [Public Resources Code section 21167.6, subdivision (e), does not abrogate the attorney-client or the attorney work-product privileges].) None of the cases cited in the comment states otherwise.

The comment states that the City has interfered with the record, prejudicing public review. This statement is incorrect. The City has not included in the record those documents that are (1) not required to be part of the record of proceedings pursuant to Public Resources Code section 21167.6, or (2) subject to a privilege or a non-disclosure requirement.

Silverstein-5 Pursuant to the CEQA Guidelines (Sections 15105 and 15205(d)), and correspondingly pursuant to Chapter 12, Article 28, Section 12-100 of the City of Inglewood Municipal Code, the public review period for the Draft EIR for the Proposed Project was required

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to be 45 days, and is limited to a maximum of 60 days except under unusual circumstances. The Draft EIR was published on December 27, 2019 and public review extended through March 24, 2020, a period of 89 days. In recognition of the complexity of the Draft EIR, the City extended the comment period several times, including beyond the 60 limit established under Guideline 15105(a). The 45-day public review period required by the State Clearinghouse extended through February 10, 2020 (actually, 46 days due to the need to conclude the public review period on a weekday); extensions beyond that date did not require noticing through the State Clearinghouse, and were noticed through the County Clerk as required pursuant to Guideline 15087(d), through publication in a newspaper of general circulation, as authorized pursuant to Guideline 15087(a)(1), and through updated notices on the City's website.

Because the City chose to extend the public review period to nearly twice that required under CEQA, and to provide notice of each and every extension, the public was not denied an opportunity to provide comment on the Draft EIR. In fact, the public was provided an unprecedented amount of time to review and submit comments on the Draft EIR, and the Proposed Project EIR process cannot be fairly characterized as having been "fast-tracked."

During the latter part of the extended public review period for the Draft EIR, the COVID-19 pandemic emerged in California. On March 4, 2020, on day 69 of the Draft EIR public review period, Governor Newsom proclaimed a State of Emergency in California, and on March 19, 2020, on day 84 of the Draft EIR public review period, issued Executive Order N-33-20, establishing a Statewide Stay-at-Home order. These conditions all occurred following the conclusion of the required 45-day public review period. Further, because they were limitations on physical travel, they provided no obstacle to submittal of comments on the Draft EIR by direct mail or email. Thus, the COVID-19 pandemic did not coincide with the legally-required 45-day public review period, and did not inhibit the ability of the public or agencies to submit comments on the Draft EIR during the last 5 days of the 89-day public review period on the Draft EIR provided by the City.

The actions taken by public and private officials to implement stay-at-home and other public health directives, including decisions to postpone or reschedule the Olympics, major sports leagues, or other large public gatherings have no relevance to the process undertaken by the City to properly process and provide extended time for public review of the EIR for the Proposed Project.

Silverstein-6 The Final EIR for the Proposed Project was published on June 4, 2020, and, consistent with the requirements of CEQA Guideline 15088, contains good-faith responses to all comments submitted to the City during the 89-day Draft EIR public review period as well as comments received after the close of the comment period. The responses to comments provided in the Final EIR address comments submitted by other

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governmental agencies, organizations such as the Natural Resources Defense Council, as well as numerous other entities and individuals.

The comment notes comments “by other objectors like the Forum and IRATE,” and refers to “...objections about illegal precommitment to the project in violation of CEQA by the City’s entering into the Exclusive Negotiating Agreements (ENA) ... and other documents demonstrating that the impending approvals were a post hoc rationalization for decisions already made.” The City received no comments on the Draft EIR, and has received none since publication of the Final EIR, from The Forum, Inglewood Residents Against Takings and Evictions (IRATE), or representatives thereof, and thus there are no comments on or objections to the content of the EIR from the aforementioned entities. None of the comments received by the City during the Draft EIR comment period addressed the ENA or stated that the City had “precommitted” to the Proposed Project.

The comment asserts that the City’s entering into an ENA with the project applicant represented an “illegal precommitment to the project,” and that the EIR and related documents represent “*post hoc* rationalization for decisions already made.” These issues were adjudicated in *Inglewood Residents Against Takings and Evictions v. City of Inglewood* (Superior Court of California, County of Los Angeles, Case No. BS170333, December 27, 2018). The case addressed three related issues:

- Did the City violate CEQA in approving the ENA with the project applicant prior to conducting environmental review;
- Did the ENA constitute an approval of an essential step in the implementation of the Proposed Project; and
- Did executing the ENA foreclose consideration and approval of alternatives and mitigation measures?

In addressing these questions, the Court quoted the ENA which states: “The Parties in no way intended for this Agreement to waive or restrict the Public Entities’ exercise of their independent, discretionary judgment with regard to CEQA or a DDA for the development of the Proposed Project within the Study Area Site or any portion thereof, or any City discretionary decisions or determinations relative to Entitlements required for the Proposed Project.” In finding that execution of the ENA did not violate CEQA, the Court found that “[t]he ENA preserves all authority over approval to the City”, that “the ENA is not an essential necessary action...toward eventual implementation of the Clippers arena,” and that “the ENA does not commit the City to any course of action except that of good faith negotiations.” The Court further found that “[t]he City retained its discretion in the ENA to consider alternatives and mitigation measures,” and that “[t]he City’s execution of the ENA did not impermissibly foreclose consideration and approval of meaningful alternatives and mitigation measures.”

The plaintiff in this case filed a notice of appeal of the trial court’s decision to deny the petition. On May 4, 2020, the plaintiff filed a request for dismissal with the Court of



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Appeal. That same day, the Court of Appeal filed a dismissal order. The case is now completed. (*Inglewood Residents Against Takings and Evictions v. City of Inglewood* (Second Dist. Court of Appeal, Case No. B296760).) The trial court’s judgment is therefore final.

The trial court’s decision was correct. Under applicable law, the ENA does not constitute “approval” of the Proposed Project. In *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, the California Supreme Court held that “a preliminary public-private agreement for exploration of a proposed project” may constitute “approval” of a project, and thereby trigger the need for prior CEQA review, if the agreement, “viewed in light of all the surrounding circumstances, commits the public agency as a practical matter to the project.” (*Id.* at p. 132.) In this case, no such commitment occurred. The ENA established a period during which the City would work exclusively with the applicant to investigate the Proposed Project, and to negotiate in good faith concerning the terms under which the proposal might proceed. The City expressly reserved the right to adopt mitigation measures or to approve an alternative to the Proposed Project, including the “No Project” alternative. The ENA provided that no decisions regarding the Proposed Project would be made by the City until after the CEQA process had been completed. Under such circumstances, in agreeing to the ENA, the City did not “approve” the Proposed Project. (See *Cedar Fair, L.P. v. City of Santa Clara* (2011) 194 Cal.App.4th 1150, 1169-1171 [approval of “term sheet” for football stadium did not constitute approval of project under CEQA].) Please see Response to Comment Silverstein-44.

In the IBEC Draft EIR, the City considered the comparative impacts of seven alternatives to the Proposed Project, including five alternative sites, and identified and required 69 distinct mitigation measures, including 165 specific sub-measures. Thus, it is evident that the City’s consideration of both alternatives and mitigation measures in the EIR was extremely thorough and in no way hindered or limited by the prior execution of the ENA.

In sum, the comment’s assertion that the EIR is part of an effort to create post hoc rationalization for approval of the Proposed Project is factually and legally incorrect.

Silverstein-7 Final EIR, Chapter 3, Response to Comment Caltrans-5 addresses Caltrans’ request that the City further consider the identification of mitigation for cumulative impacts of the Proposed Project on the mainline segments of the I-405 freeway. The Draft EIR had previously identified mitigation for off-ramp conditions at the northbound and southbound off-ramps of I-405 at Century Boulevard. This type of mitigation is most commonly used in CEQA documents to reduce traffic congestion at off-ramp intersections which can cause backups that concomitantly result in impacts to the mainline freeway segments; it is much less frequent that it is determined feasible for individual development projects to address mainline freeway improvements.

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In this case, as part of its good faith effort to respond to this comment from Caltrans, the City further considered the potential to provide funding to feasibly and proportionally mitigate cumulative impacts to the I-405 freeway segments. Several meetings were conducted between the City, its consultants, and Caltrans, and agreement was reached on a fair share contribution to Caltrans' existing I-405 Active Traffic Management (ATM)/Corridor Management (CM) project. As described in a May 7, 2020 Technical Memorandum from the City's transportation consultant, Fehr & Peers, the total cost of the ATM/CM Project is \$29,000,000, and the fair share contribution of the Proposed Project is 5.1%, or \$1,524,900. Caltrans concurred in this assessment and determination of the fair share contribution.<sup>1</sup> The fair share contribution of \$1,524,900 is required through a new Mitigation Measure 3.14-24(h), added in the Final EIR, Chapter 3, Response to Comment Caltrans-5 and accepted by the project applicant. As is noted in the Mitigation Monitoring and Reporting Plan (MMRP), the payment of the required fair-share contribution is required to be completed prior to issuance of the first building permit for arena construction following excavation.

As such, not only did the City fully comply with the requirements for a good faith response articulated in CEQA Guideline § 15088, but Final EIR, Chapter 3, Response to Comment Caltrans-5 and the resulting Mitigation Measure 3.14-24(h) meet the standards established by the courts in the *California Clean Energy v. City of Woodland* case cited by the commenter.

- Silverstein-8 The analysis of operational emissions presented in Section 3.2, Air Quality, addresses operational emissions using significance thresholds established by the South Coast Air Quality Management District (SCAQMD) and reflecting State and federal air quality standards. The calculations of operational emissions account for all project-related sources, including stationary, mobile, and area sources. The assessment of mass emissions is provided on a peak daily basis, consistent with the SCAQMD thresholds. The analysis of operational emissions in the EIR also includes a Health Risk Assessment which, consistent with the approved Office of Environmental Health Hazard Assessment (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments*, accounts for exposures to all emissions sources over a 30-year period, including both construction and operational emissions. Similarly, the analysis of GHG emissions accounts for emissions of all sources of GHG emissions over the construction period and 30 years of Proposed Project operations. These methodologies represent the state-of-the-art for analysis of emissions associated with development projects like the Proposed Project and provide detailed analysis of project impacts.
- Silverstein-9 Please see Final EIR, Chapter 3, Response to Comment Channel-23.

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<sup>1</sup> Carlo Ramirez, Transportation Planner, Caltrans District 7 Division of Planning, *Email to Lisa Trifiletti*, May 14, 2020.

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Silverstein-10 The comment incorporates by reference “all prior objections to the project, including but not limited to objections/comments to the Project in the administrative record, or that should have been in the administrative record, dated prior to the public comment period beginning on December 27, 2019 and objections to the AB 987 certification.”

This statement, including reference to unknown materials that “should have been in the administrative record” is so general and unspecific that the City has no way to determine what environmental matters to which the commenter objects, and fails to meet the standards of incorporation by reference established in the CEQA, the CEQA Guidelines, as well as failing the standards for exhaustion of administrative remedies that have been established by the courts.

Public Resources Code (PRC) §21177(a) establishes that “[a]n action or proceeding shall not be brought pursuant to Section 21167 unless the alleged grounds for non-compliance with this division [CEQA] were presented to the public agency orally or in writing by any person during the public comment period provided by this division or before the close of the public hearing on the project before the issuance of the notice of determination.”

CEQA Guideline §15150(c) reinforces this concept in establishing the requirement for incorporation by reference in the context of an EIR, stating that “the incorporated part of the referenced document shall be briefly summarized where possible or briefly described if the data or information can be summarized. The relationship between the incorporated part of the referenced document and the EIR shall be described.” The comment’s broad and vague statement meets none of the requirements for incorporation by reference established in Guideline §15150(c).

As interpreted by the Courts, PRC §21177 mandates that the lead agency must be provided sufficient specificity as to the issue being raised so as to be able to respond. In *Mani Brothers Real Estate v. City of Los Angeles* (2007) 153 Cal.App.4th 1385, 1394, the California Court of Appeal, Second Appellate District cited a long line of Appellate Court cases in explaining the requirements for specificity:

The rationale for exhaustion is that the agency ““is entitled to learn the contentions of interested parties before litigation is instituted. If [plaintiffs] have previously sought administrative relief ... the [agency] will have had its opportunity to act and to render litigation unnecessary, if it had chosen to do so.”” (*Citizens Assn. for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151, 162–163.) The “exact issue” must have been presented to the administrative agency to satisfy the exhaustion requirement. (*Resource Defense Fund v. Local Agency Formation Com.* (1987) 191 Cal.App.3d 886, 894.)

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(See also *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2020) 47 Cal.App.5th 588, 618-619.)

The general and vague attempt to incorporate by reference comments and objections that are part of the record, or “should be” part of the record, fails to meet the requirement that the “exact issue” must be presented to the City, and thus fails to allow the City to understand and respond prior to considering whether to take action on the Proposed Project.

The comment includes a reference and quotation from PRC §21189.55 pertaining to the consideration of new information after the close of the public review period for an EIR. This section of CEQA was added in 2016 as part of a new Chapter 6.7 and applies to the judicial review of CEQA documents related to the Capitol Building Annex and State Office Building Projects (see PRC §§21189.50 to 21189.57). PRC §21189.57 explicitly limits the applicability of Chapter 6.7 to projects that are expressly addressed in Chapter 6.7. Because the Proposed Project does not meet any of the definitions of applicable projects in CEQA Guidelines §21189.50, PRC §21189.55 does not apply to the CEQA process for the Proposed Project. Nevertheless, in the interest in completeness and responsiveness, the City has considered and responded to all comments in this letter.

Silverstein-11 The present COVID pandemic does not undermine the legitimate analyses undertaken based on substantial evidence in the record that are included in the EIR. While the length of time that COVID health directives will disrupt activities that are described in the EIR are currently unknown, there is no evidence in the record to support a conclusion that such directives will extend into the period of planned project construction, starting in mid-2021, let alone project operations planned to start in the fall of 2024. Even if current conditions were to extend for a year and be in place during the initial stages of project construction, it is most likely that the construction activities would be declared “essential” and proceed as described in the EIR; to wit, the construction of Sofi Stadium, and numerous other major projects in the State of California, have proceeded despite COVID-related health directives in 2019. There is no reason for the City to assume that similar levels of construction activity would not occur in mid-2021 if current conditions continue to exist at that time.

There is no evidence of which the City is aware that predicts or even speculates that the COVID pandemic will continue for the more than four years when operation of the Proposed Project is anticipated to begin. Thus, the most reasonable current estimate of future conditions is that the information disclosed in the EIR represent the conditions that will exist at the time of initiation of project operations. Nevertheless, even if current COVID health directives were to remain in place for over four years, it is not reasonable to assume that such conditions would limit the effective use of mass transit systems, such as the LA Metro light rail system, yet also allow mass gatherings such as use of the Proposed Project arena for sold out basketball games or other events. Based on the

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current COVID-related health directives, if conditions exist where use of transit systems is limited for health reasons, it is also certain that full use, and potentially any use, of the Proposed Project arena would be prohibited. If physical distancing requirements are still in place, it is reasonable to assume that the capacity of the Proposed Project arena would be similarly limited and therefore use of automobiles by attendees, even with limited use of transit, would have lower levels of impact than disclosed in the EIR.

Furthermore, while the short-term effects of COVID have certainly reduced use of public transit as cited in the comment (both due to concerns about social distancing and spread on transit and to the stay-at-home orders reducing travel in general), the long-term effects on travel behavior after the COVID pandemic conditions end are not currently known. It is speculative to assume that transit will not be viable as a mode in the future.

Thus, the current COVID pandemic conditions do not undermine the adequacy, accuracy, or completeness of the EIR on the Proposed Project.

The comment also states that there are no statistics or studies to support the assumption that reduced parking or more bus lines will make people use buses, walk, or ride bicycles, and that Metro ridership has been declining in all major cities where public transit measures were improved and transit-oriented development policies were introduced. It is true that public transit use, particularly bus transit, has been declining in recent years in many cities. This phenomenon, however, is not relevant to the analysis in the Draft EIR. As described on Draft EIR pages 3.14-95 to 3.14-96 and further explained in Draft EIR Appendix K.1, Technical Memorandum #2, Project Travel Demand Estimates, the transit mode splits used in the Draft EIR for the Project were developed beginning with surveys of the travel behavior of Clippers fans actually attending basketball games at Staples Center in downtown Los Angeles. These were used to calibrate a transit mode share logit model developed specifically for the Draft EIR and calibrated to existing conditions that estimates transit utilization based on transit and driving travel time and travel costs. The logit model was then used to reflect the changes in transit access and service levels between Staples Center in downtown Los Angeles and the Project site in Inglewood to estimate the transit mode splits for the Project. Thus, the transit mode split estimates in the Draft EIR were rooted in actual conditions in Los Angeles.

Silverstein-12 The comment claims, based on one source cited in the comment (an analysis by Thomas Rubin), that public transit is not “ecologically green” and, as such, more GHG emissions and air pollution will be generated by the Project than assumed in the Draft EIR.

Rubin’s analysis specifically critiques the assumptions and analyses in a prior study published by Duke University. The authors of that analysis, however, are quoted in Rubin’s article as saying that the purpose of that analysis was “not to analyze fuel efficiency but rather to map out the U.S. supply chain for the manufacture of transit buses.”

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The comment makes the presumption that a single, decade-old study with particular assumptions is the sole basis for determining whether transit is “greener” than personal auto use. There is a large and growing body of recent scientific study on greenhouse gas emissions<sup>2</sup>, however, that supports the ecological benefits of public transit over single-occupancy vehicles. One of the key takeaways from the most recent studies is the transition from high-particulate matter diesel fuel buses, which were still predominant in 2010, to CNG and low-emissions diesel and biodiesel engines, which have been mandated across the county beginning with the 2007 model year and are now the predominant product.<sup>3</sup> These newer engines significantly reduce (or in the case of CNG, eliminate entirely) PM<sub>2.5</sub>, one of the worst effects on air quality. In the LA metropolitan region, transit ridership prior to the pandemic was strong relative to the rest of the nation. Although passenger loads vary tremendously by line, the Project Site is located in a part of the region that has generally high performing bus transit, particularly along La Brea Avenue, Century Boulevard, and Crenshaw Boulevard. Based on ridership data from Metro, several of those bus routes are in the top 25% for ridership on the system.

Although bus is the predominant mode, Metro has expanded, and continues to significantly expand, the light rail network, including the Crenshaw and Green Lines which will operate within the vicinity of the Proposed Project.

The Proposed Project TDM Plan (see Mitigation Measures 3.14-1(a) and 3.14-2(b)) would promote the use of transit (primarily light rail transit and to a lesser extent bus transit) through marketing and outreach, and through the use of passes, discounts and subsidies. Much of the TDM Plan is devoted to providing shuttle connectivity to existing and planned LA Metro light rail stations, to address the “first/last mile” challenge that often deters transit users. These programs would increase ridership and increase the “green” aspect of transit use associated with the Proposed Project.

LA Metro’s light rail system is largely powered by electricity, the supply of which is becoming increasingly green with California’s Renewable Portfolio Standard and with the LA Region’s Clean Power Alliance offering more options for purchasing clean, renewable power at competitive rates (<https://cleanpoweralliance.org/>). Further, bus transit has generally become “greener” since the 2010 referenced study was published, with fleets adding more hybrid-electric and fully-electric buses in the fleets. In fact, LA

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<sup>2</sup> Examples include “The Route to Carbon and Energy Savings: Transit Efficiency in 2030 and 2050.” McGraw, Shull, Miknaitis. November 2010. [https://www.apta.com/wp-content/uploads/Resources/resources/reports\\_andpublications/Documents/Route\\_to\\_Carbon\\_and\\_Energy\\_Savings\\_TCRP\\_J11\\_Task9.pdf](https://www.apta.com/wp-content/uploads/Resources/resources/reports_andpublications/Documents/Route_to_Carbon_and_Energy_Savings_TCRP_J11_Task9.pdf) and “Quantifying Greenhouse Gas Emissions from Transit.” September 10, 2018. American Public Transportation Association. [https://www.apta.com/wp-content/uploads/Standards\\_Documents/APTA-SUDS-CC-RP-001-09\\_Rev-1.pdf](https://www.apta.com/wp-content/uploads/Standards_Documents/APTA-SUDS-CC-RP-001-09_Rev-1.pdf)

<sup>3</sup> American Public Transportation Association, *2020 American Public Transportation Fact Book*, 2020. <https://www.apta.com/wp-content/uploads/APTA-2020-Fact-Book.pdf>

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Metro recently purchased 95 electric buses and the Metro Board has adopted a policy of converting Metro's entire fleet of buses to zero emission vehicles by 2030.<sup>4</sup>

Furthermore, most bus transit in LA has been operating with low-emission CNG buses for over a decade, which has significant benefits over the diesel buses that make up the basis of the Rubin critique. Even private charter buses based in the region are often powered by CNG, as many of the charter bus companies operate former LA Metro equipment (for example, Transit Systems, which is an operator of the Hollywood Bowl shuttles).

Finally, it should also be noted that the City's ECAP, CARB's 2017 Scoping Plan Update, the Proposed Project's LEED Gold certification requirements, and the SCAG 2016 RTP/SCS all call for improving the quality and the accessibility of public transit as a strategy for reducing GHG emissions.

As discussed in Silverstein-11, COVID-19-related changes to travel patterns are expected to occur in the short term. However, there is no reasonable expectation that this will become the permanent condition. As discussed in Response to Comment Silverstein-11, while transit agencies will likely continue with reduced capacity buses and trains for the next year, it is reasonable to expect that by the time indoor full capacity attendance at major event venues is determined to be safe and allowed, it would be equally safe to ride a fully occupied bus.

The challenge to the Proposed Project and public policymakers is to support that body of work with action that encourages people to choose transit even when they might have the opportunity to drive alone. There are many reasons besides environmental benefit that someone might choose to take transit to an event at the Project Site, not the least of which can include incentives the project applicant would be conditioned to provide to employees and patrons as part of the Proposed Project's TDM Program.

As can be seen from the discussion above, the decade-old article provided by the commenter does not reflect either the current state of transit and transit technology as a method of reducing GHG emissions, or the specific methods and types of transit that would be enhanced and incentivized as part of the Proposed Project GHG Reduction Plan.

Silverstein-13 Please see Responses to Comments Silverstein-5 and Silverstein-12.

Silverstein-14 The EIR included a stable and detailed description of the Proposed Project in Draft EIR Chapter 2, Project Description.

The information on the hotel component of the Proposed Project is presented in Table 2-2, page 2-18, and on pages 2-45 and 2-46 of the Draft EIR. Although acknowledging

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<sup>4</sup> <https://thesource.metro.net/2017/07/27/as-metro-pursues-electric-bus-fleet-by-2030-three-bus-contracts-go-to-board-on-thursday/>

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that the level of design of the hotel is currently less than of other components of the Proposed Project, the description provides information about the number of rooms (up to 150), height (up to six stories/100 feet), access, and anticipated building materials. The description also identifies uses, such as meeting rooms and restaurant uses, that would not be part of the hotel. Details about access from West Century Boulevard, and surface and structured parking is provided. The configuration of the proposed hotel use is clearly depicted in the Draft EIR on Figure 2-7, Conceptual Site Plan; Figure 2-18, Preliminary Landscaping Plan; Figure 2-20, Conceptual Sign Locations; Figure 2-22, Temporary and Permanent Bus Stop Relocations; and Figure 2-24, Bicycle and Electric Vehicle Parking. On Draft EIR page 2-55 it is explained that the hotel “would be LEED Gold certified under LEED BD+C Hospitality.” Infrastructure improvements necessary to support the hotel are depicted on Figure 2-26, Conceptual Potable Water Infrastructure; Figure 2-29, Conceptual Wastewater Infrastructure; Figure 2-30, Conceptual Drainage Infrastructure; and Figure 2-31, Conceptual Dry Utilities Infrastructure.

On page 2-85 of the Draft EIR, it is acknowledged that the exact timing of construction of the hotel is unknown, but that to ensure that the maximum impacts are described in the Draft EIR, it was assumed that construction of the hotel would overlap the construction of the other elements of the Proposed Project. The assumed construction schedule for the hotel is presented in Table 2-5, page 2-83 of the Draft EIR, as noted below:

- Site Preparation: July – August, 2021
- Drainage/Utilities/Trenching: September – October, 2021
- Grading/Excavation: October 2023
- Building Construction: February – September 2024
- Paving: September – October, 2024
- Architectural Coatings: August – October, 2024

Please also see Final EIR, Chapter 3, Response to Comment Channel-2 for further discussion of the detail, accuracy, and stability of the Project Description in the EIR.

Footnote 16, in this comment, includes assertions that the City considers hotel uses to be residential structures, and that as such, the proposed hotel use would not be a compatible use on the Project Site pursuant to the FAA grants by which the property was acquired by the City or the Successor Agency. These assertions are incorrect. Please also see Final EIR, Chapter 3, Response to Comment Channel-2. Chapter 12, Article 1, Section 12-1.35 of the City of Inglewood Municipal Code defines the term “dwelling” to be “a building or portion thereof designed for or occupied for residential purposes, including one-family, two-family, multiple dwellings, transitional housing, and supportive housing, **but not including hotels**, boarding and lodging houses” [emphasis added].

On July 1, 2020, the applicant and the City presented the Proposed Project to the Los Angeles County Airport Land Use Commission (ALUC) to determine whether the



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project is consistent with the Los Angeles County Airport Land Use Plan (ALUP). The Proposed Project presented to the ALUC for a consistency determination included a hotel with up to 150 rooms. Following a public hearing, the ALUC adopted a resolution finding that the Proposed Project is consistent with the ALUP. The findings included a determination that the Proposed Project “does not propose noise-sensitive uses, such as residential, education, and health-related (i.e. hospital) uses on the site within the [Airport Influence Area] of LAX.” (ALUC Resolution, Aviation Case No. RPPL2020000310, Project No. 2020-001033-(2).) Thus, both the City and ALUC have determined that, because the hotel use is not a residential use, it is not an incompatible use.

Silverstein-15 As noted above (see Response to Comment Silverstein-14), the comment states that the IBEC EIR’s project description is inadequate. The comment cites one aspect of the project description in support of this statement: the hotel proposed on the East Transportation Hub and Hotel site. The comment states that information presented on the hotel is too vague and unstable to comply with CEQA, citing the Court of Appeal’s recent decision in *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1. The City disagrees. The IBEC EIR includes sufficient information regarding the proposed hotel to analyze its impacts. (See Silverstein-14.)

The comment states that the applicant’s proposed Sports and Entertainment Center (SEC) Overlay Zone authorizes additional uses that are not identified or analyzed in the IBEC Draft EIR.

This statement is incorrect. The uses authorized under the SEC Overlay Zone are all uses that are identified as part of the IBEC EIR’s project description. The proposed uses are listed in IBEC EIR Table 2-2. They include, among other things:

- Retail shops, full service and quick service restaurants, kitchens, bars and food service (48,000 square feet)
- A full-service restaurant/bar (15,000 square feet)
- A coffee shop (5,000 square feet)
- A quick-service restaurant (4,000 square feet).

The SEC Overlay Zone authorizes these uses. The Project Description and the SEC Overlay Zone are therefore consistent with one another. The EIR analyzes the impacts of these uses. (See, e.g., IBEC Draft EIR, p. 3.14-3 [describing various scenarios analyzed in transportation analysis, including “ancillary uses” such as restaurants and community space]; Technical Appendix K.2 [including trip generation rates for ancillary uses, including hotel, restaurant, etc.] )

The same is true with respect to other uses authorized by the SEC Overlay Zone. The zone authorizes, for example, infrastructure and ancillary structures and uses that enable the use of the plaza area for outdoor events. The EIR identifies outdoor events in the

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plaza as a use that is contemplated. (IBEC Draft EIR, p. 2-18, Table 2-2.) The impacts of such events are analyzed wherever relevant throughout the document. (See, e.g., IBEC Draft EIR, pp. 3.11-2 [noise analysis included noise generated during plaza events], Technical Appendix K-3 [estimate of vehicle miles traveled includes scenario consisting of 4,000-person event in outdoor plaza].) The statement that these uses were not analyzed is therefore incorrect.

Uses are authorized under the SEC Overlay Zone only if they are ancillary or accessory to those primary uses set forth in the zoning. Such a provision is commonplace, and appears throughout the City's zoning code, as well as the zoning code of cities and counties throughout the state. Such a provision does not mean that the EIR is invalid. (See *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1450 [county was not required to analyze, as part of the project, the possibility that some residences would seek to construct second units on each parcel] (“*Save Round Valley*”).)

The comment states that the SEC Overlay Zone and SEC Design Guidelines allow the Planning Department Director to override development standards located elsewhere in the Zoning Ordinance. The SEC Overlay Zone and SEC Design Guidelines, however, provide specific guidance concerning what uses are authorized, and what design standards must be achieved. The Planning Department can approve uses and designs only if they are consistent with the specifications set forth in the SEC Overlay Zone and Design Guidelines. The SEC Overlay Zone and Design Guidelines, in turn, are consistent with the project as described and analyzed in the IBEC EIR.

The comment quotes at some length from *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1. The circumstances at issue in that case bear no relationship to the proposed SEC Overlay Zone here. In *Stopthemillenniumhollywood.com*, the zoning approved by the city provided the developer with the option of constructing offices, residences, commercial uses, or a mix of the three. Moreover, the EIR's project description “fail[ed] to describe the siting, size, mass, or appearance of any building proposed to be built at the project site” and that the proposed development regulations imposed only vague and ambiguous limits on what actually could be built. The public was therefore left in the dark regarding both the design, massing and scale of buildings, and the uses that they would contain – instead, the project was more or less a black box in which any number of uses or designs could be permitted. That approach violated CEQA because it provided the public with insufficient information to participate meaningfully in the environmental review process.

In this case, by contrast, such details are provided. The EIR's project description provides a detailed site plan, including renderings and cross sections. (IBEC Draft EIR, Chapter 2, Figures 2-17 through 2-17.) The EIR also includes a detailed list of the uses that are authorized at the site. (IBEC Draft EIR, Chapter 2, Table 2-2; see also Table 2-3 [description of characteristics of events at Arena].)

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Other EIRs have been upheld with project descriptions contained much more flexibility than exists here. In *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, for example, the project description allowed the developer to proceed with a mixed use project that emphasized either office or residential uses. Nevertheless, the EIR provided sufficient information to analyze the impacts of the project, regardless of which version of the project was actually built. Similarly, in *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, the project included both fixed and flexible elements, allowing certain uses to be moved around the site if, for example, hazardous materials precluded development in a particular area.

In this case, no such shift – of uses from one location to another, or from an office-oriented to a residential-oriented project – is proposed. To the extent there is any flexibility at all, it pertains to the design of the hotel, which is appropriate given that (1) the hotel has not yet been designed, (2) the hotel developer / operator has not been identified, and (3) sufficient information is provided to analyze the impacts of the hotel, when a specific design is presented. If a hotel is proposed that departs from the description in the EIR – if, for example, a 200-room hotel is proposed – then further CEQA review would have to be performed prior to approving such a hotel. Please see Response to Comment Silverstein-14 regarding the proposed hotel.

Silverstein-16 The comment asserts that delays in the Crenshaw Line construction and the possible future Centinela grade separation project will significantly affect the Draft EIR cumulative impact analysis and add more construction impacts than contemplated in the Draft EIR, also translating into operational limitations and a failure to serve the Project Site. The Draft EIR assumed opening of Crenshaw Line in mid-2020 (see Draft EIR page 3.14-53), not 2019 as incorrectly stated in the comment. The currently-anticipated delay in the opening of the Crenshaw Line to mid-2021 per the Los Angeles Times article cited in the comment would not affect analysis of Proposed Project operational impacts because the Proposed Project is not scheduled to open until the latter part of 2024. The Streetsblog article cited in the comment speaks of two years of a possible bus bridge to allow for construction of the Centinela grade separation, but also notes that the grade separation is not funded. If that construction were to occur prior to the Proposed Project opening in 2024, it would not affect the analysis of the operational impacts of the Proposed Project. If it were to occur later, the bus bridge would permit service to continue along the route.

In regards to construction impacts, the Draft EIR determined that cumulative construction impacts for the Proposed Project would be significant and unavoidable. Concurrent construction of the LA Metro Crenshaw line and the Centinela grade separation would not materially affect this conclusion given the distance between these projects and the Project Site (1.5 to 1.75 miles), with different access routes for trucks, etc.

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Silverstein-17 The March 24, 2020, agreement referred to in the comment is characterized as a “Settlement Agreement.” This characterization is inaccurate. Rather, the three-party agreement was entered into by entities that represent the project applicant, The Forum, and the City. The agreement is a “standstill agreement,” in which the parties agreed to not undertake certain specific actions for a defined period of time. Among other things, and with respect to the City’s obligations, during the period of the agreement, the City agreed to not release or certify the Final EIR, or adopt or approve the Proposed Project. The agreement did not limit any party from taking actions following the end of the period of the agreement, and the City agreed to take additional steps to ensure that other parties were not prejudiced by their agreement to not submit comments on the Draft EIR during the period of the agreement. There are no provisions of the March 24, 2020, standstill agreement that can be construed as “significant new information” pursuant to PRC §21092.1 and CEQA Guideline §15088.5.

On May 4, 2020, a company with common ownership as the LA Clippers (CAPPS LLC) completed the acquisition of The Forum from the Madison Square Garden Company (MSG) and all pending litigation between the parties was dismissed.

The comment states that the EIR does not analyze impacts associated with use of parking facilities by the Proposed Project. This comment is difficult to follow, but it appears to conflate a Citywide Permit Parking Ordinance adopted by the City of Inglewood in April 2020 with proposed amendments to the City Code that are specific to, and would be approved as part of, the SEC Overlay Zone that would be adopted to implement the Proposed Project.

With respect to the Citywide Permit Parking Ordinance, as discussed in the Final EIR, Chapter 3, Response to Comment Sambrano-9, the Citywide permit parking ordinance is intended to protect street parking throughout the City from potential encroachment by patrons attending events at SoFi Stadium. That is why the City adopted the program this year, prior to the anticipated opening of SoFi Stadium. This was also explained fully in all of the City’s public outreach materials regarding the ordinance at the time it was being adopted, including mass mailers, letter to residents, email blast, and FAQs.<sup>5</sup> As such, the ordinance is independent of, and not a part of, the Proposed Project. Please see Response to Comment Silverstein-44.

The comment claims that the citywide permit parking ordinance is inoperable without the Proposed Project because it has no independent utility without an approved Sports and Entertainment Complex. Similar to the discussion above, this claim is not accurate. The Proposed Project is not required for the parking ordinance to have utility, and such

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<sup>5</sup> City of Inglewood, Citywide Permit Parking Districts Program, mass mailer distributed prior to April 7, 2020, City Council hearing, April, 2020.

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an ordinance is not described as among the actions necessary to implement the Proposed Project in the EIR Project Description, Section 2.6. As explained above, the ordinance was adopted by the City in anticipation of the upcoming opening of SoFi Stadium, which is an approved sports and entertainment complex.

The Draft EIR did not assume that parking for the Proposed Project arena would take place in surrounding neighborhoods, and thus the assumptions of the Draft EIR are not affected by the City's adoption of the citywide parking permit ordinance. In addition, the Event Transportation Management Plan (see EIR Appendix K.4) includes an element directed at protecting neighborhoods from transportation-related impacts associated with events at the Proposed Project's arena. A portion of this plan addresses the potential for neighborhood parking intrusion. (See Event TMP, Element 8.)

The comment states that the City is considering a "stealth" ordinance that will increase the Proposed Project's impacts. This statement is inaccurate. The Draft EIR identifies the SEC Overlay Zone as a mechanism for implementing the Proposed Project. (IBEC Draft EIR, pp. 2-55, 2-89.) The City is following the same procedures with respect to consideration of the SEC Overlay Zone ordinance as it would for any ordinance.

The comment suggests that the EIR did not analyze the impacts associated with the SEC Overlay Zone's parking provision. The comment is incorrect. Draft EIR Chapter 3.14 provides a comprehensive analysis of multiple scenarios, including scenarios in which concurrent events are taking place at both SoFi Stadium and the Proposed Project. The Draft EIR assumed that parking for major events at the Proposed Project arena would occur at the onsite parking garages and within the Hollywood Park Specific Plan area (in the new parking lots constructed for SoFi Stadium), as well as at the Hollywood Park Casino. The analysis showed that sufficient parking would be available at those locations to accommodate Proposed Project parking needs. When there are concurrent events at SoFi Stadium, the Draft EIR assumed that some parking for the Proposed Project would occur at other off-site locations considered likely to be available and of enough size to be efficient for management and operation of a shuttle system. (See, e.g., Draft EIR, pp. 3.14-100 – 3.14-101, 3.14-331 – 3.14-347, 3.14-480 – 3.14-482; see Figure 3.14-23 [map showing location of off-street parking facilities likely to be used when Hollywood Park Specific Plan lots are unavailable due to concurrent event].) The SEC Overlay Zone's parking provisions are designed to enable the Proposed Project to use these off-site locations on those occasions when they are needed.

Silverstein-18 The comment states that the City has committed to approving the Proposed Project, prior to completing the CEQA process. The comment cites the City Council's decision on March 24, 2020, to approve an agreement between the City and other entities concerning the Proposed Project. The comment also states that the City violated the Brown Act in connection with its March 24, 2020, hearing.

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The City has already responded to the comment's claim that the City violated the Brown Act. In its response, the City described the actions taken at the March 24 City Council hearing and explained why those actions were consistent with the Brown Act. (See Letter from Kenneth R. Campos, City Attorney, City of Inglewood, to Robert Silverstein (April 30, 2020).)

The City disagrees that the March 24, 2020, agreement pre-committed the City to approving the Proposed Project. In the agreement, the City agreed to refrain from releasing the Final EIR or considering whether to certify the EIR or approve the Proposed Project, during a "standstill period" (as defined). The City also agreed to accept comments from MSG or IRATE, even if those comments were submitted after the close of the Draft EIR comment period. The City took no action on the IBEC EIR, or on the Proposed Project itself. Indeed, the agreement specifically provides that, in entering into the agreement, the City had not committed to approving the Proposed Project. Paragraph 14 of the agreement states:

14. Other than as expressly set forth herein, the City retains the absolute sole discretion to make decisions under CEQA with respect to the Proposed Project, which discretion includes: (i) deciding not to proceed with development of the Proposed Project, (ii) deciding to proceed with development of the IBEC Project, (iii) deciding to proceed with any alternative development of the Proposed Project, and (iv) deciding to modify the Proposed Project as may be necessary to comply with CEQA. There shall be no approval or commitment by the City regarding the IBEC Project unless and until the City undertakes environmental review as required in compliance with CEQA. MSG expressly agree that neither MSG nor IRATE shall, directly or indirectly, raise or object to, or support or join in any third party's objection to the existence of this Agreement as evidence of a prejudgment of the merits of the IBEC Project, in any action or proceeding, including any action or proceeding brought to attack, review, set aside, void or annul the certification of the EIR. MSG expressly agree that neither MSG nor IRATE shall, directly or indirectly, claim or assert, or support or join in any third party's claim or assertion, that this Agreement is evidence of a post-hoc rationalization in any action or proceeding, including any action or proceeding brought to attack, review, set aside, void or annul the certification of the EIR.

The City's commitments in the agreement stop far short of anything resembling project "approval," as that term has been understood by the Courts. The leading case on this issue is the California Supreme Court's decision in *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116. There, the Court considered whether approving a development

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agreement and taking other preliminary steps constituted “approval” of a proposed project, such that the CEQA process ought to have been completed before the agency took those steps. The Court adopted the following test for determining whether agency actions amount to “approval” of a project:

A CEQA compliance condition can be a legitimate ingredient in a preliminary public-private agreement for exploration of a proposed project, but if the agreement, viewed in light of all the surrounding circumstances, commits the public agency as a practical matter to the project, the simple insertion of a CEQA compliance condition will not save the agreement from being considered an approval requiring prior environmental review.

(*Save Tara, supra*, 45 Cal.4th at p. 132.)

In applying this principle to conditional agreements, a court must “look not only to the terms of the agreement but to the surrounding circumstances to determine whether, as a practical matter, the agency has committed itself to the project as a whole or to any particular features, so as to effectively preclude any alternatives or mitigation measures that CEQA would otherwise require to be considered, including the alternative of not going forward with the project. (See [Guidelines], § 15126.6, subd. (e).) In this analysis, the contract’s conditioning of final approval on CEQA compliance is relevant but not determinative.” (*Save Tara, supra*, 45 Cal.4th at p. 139.)

Following *Save Tara*, courts have ruled that an agency may enter into a “memorandum of understanding” or “term sheet” with a private developer, approve a budget for a public project, or enter into a project “siting agreement” identifying specific locations where a controversial project might be located. If such agreements make clear that the agency has not committed to the project, will not make a decision until after the CEQA process is completed, and retains discretion to approve an alternative or disapprove the proposal, then in approving the preliminary agreement the agency has not “approved” the project within the meaning of CEQA. (See, e.g., *Cedar Fair, L.P. v. City of Santa Clara* (2011) 194 Cal.App.4th 1150 [term sheet for football stadium]; *California Oak Foundation v. Regents of the University of California* (2010) 188 Cal.App.4th 227 [budget for athletic center]; *City of Santee v. County of San Diego* (2010) 186 Cal.App.4th 55 [siting agreement for reentry facility].)

In this case, the March 24 “preliminary agreement” commits the City to *delay* the CEQA process, and to accept late comments under specified circumstances. The agreement does not commit the City to approve the Proposed Project. The agreement affirmatively disclaims any such intent. No surrounding circumstances state, or suggest, that the City committed to approve the Proposed Project. The March 24 agreement constitutes far less commitment than other preliminary agreements that, according to the courts, do not

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constitute “approval” of a project for CEQA purposes. The claim that the City has pre-committed to approve the Proposed Project is therefore incorrect.

- Silverstein-19 See Response to Comment Silverstein-18.
- Silverstein-20 This comment is introductory to the following 20 comments regarding comments on the Draft EIR from Caltrans, Metro, LADOT, Los Angeles County Department of Public Works, and Culver City, each of which were responded to in the Final EIR. The comment asserts that the comments from these public agencies show that the Draft EIR’s assumptions are neither enforceable nor realistic, and that the Draft EIR and Final EIR therefore fail either to identify or mitigate various impacts. This is inaccurate. Each of the comments from the various agencies that are mentioned or quoted in these comments were fully responded to in the Final EIR, and did not lead to the identification of any previously unidentified new significant impacts, or a substantial increase in the severity of any significant impacts of the Proposed Project. Contrary to the implication of the comment, simply because an agency makes a comment does not in and of itself render the Draft EIR or Final EIR inadequate. For a more detailed consideration of each of these comments, please see Responses to Comments Silverstein-21 through Silverstein-39, below.
- Silverstein-21 This comment restates Final EIR, Chapter 3, Comments Caltrans-5 and Caltrans-6. However, the comment does not reflect the responses that were provided to the Caltrans comments in the Final EIR. No new significant impacts were identified by Caltrans. The City and its transportation experts coordinated with Caltrans staff before and during the Draft EIR public review period. Full responses to these Caltrans comments are provided in the Final EIR, Chapter 3 (see Responses to Comments Caltrans-5 and Caltrans-6).
- The first Caltrans comment cited in this comment is Final EIR Comment Caltrans-5. The comment claims that Caltrans identified significant impacts. In fact, the Caltrans comment correctly noted and agreed with the Draft EIR finding of significant cumulative impacts on State facilities including the I-405 freeway and requested a fair share mitigation agreement towards traffic management system improvements along the I-405. The response in the Final EIR was to add Mitigation Measure 3.14-24(h), requiring a fair share contribution towards Caltrans’ planned Active Traffic Management (ATM)/Corridor Management (CM) project. (See Final EIR, pp. 3-11 – 3-12 [Response to Comment Caltrans-5].) Regardless, the Final EIR did not determine that the impacts would be mitigated to insignificance, but rather determined them to be significant and unavoidable. No new significant impacts not previously identified in the Draft EIR resulted from the Final EIR Caltrans-5 comment and response.
- The second Caltrans comment cited in this comment is Final EIR Comment Caltrans-6. As noted in the Final EIR Response to Comment Caltrans-6, the Proposed Project’s commitment to a fair share contribution towards Caltrans’ ATM/CM project addresses the cumulative impacts identified in the Draft EIR that were cited in the Caltrans



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comment. (See Final EIR, pp. 3-11 – 3-12 [Response to Comment Caltrans-6].) The comment claims that Caltrans' proposal in their comment that the developer work with Caltrans to develop a fair share mitigation agreement show that there is no enforceable mitigation. To the contrary, the consultation requested by Caltrans in its comment did occur and agreement was reached (see the Responses to Comments Caltrans-5 and Caltrans-6 in the Final EIR), a point omitted by the commenter. The Mitigation Monitoring and Reporting Program on page 4-72 of the Final EIR requires that the payment to Caltrans be made prior to issuance of the first building permit for the Arena following excavation, and that the City of Inglewood Department of Public Works has the responsibility to monitor and ensure that the contribution has been made. Again, no new significant impacts not previously identified in the Draft EIR resulted from the Caltrans comment and response.

Please also see Responses to Comments Silverstein-7 and Silverstein-8 regarding Caltrans' confirmation of the adequacy of the fair share payment identified in Mitigation Measure 3.14-24(h).

As part of this comment, footnote 21 says that the City, through release of the Final EIR, has "failed to comply with all of Caltrans' original study directions to the City for inclusion in the EIR." In fact, the Draft EIR evaluated the potential for Proposed Project impacts at more freeway segments and ramps than were requested by Caltrans.

Silverstein-22 This comment restates Final EIR, Chapter 3, Comments Caltrans-7, -8, and -9. However, the comment does not reflect the responses that were provided to these Caltrans comments in the Final EIR. No new significant impacts or substantial increases in the severity of impacts were identified by Caltrans. The City and their transportation experts coordinated with Caltrans staff before and during the public comment period to address their comments. Full responses to these Caltrans comments are provided in the Final EIR (see Final EIR, Chapter 3, Responses to Comments Caltrans-7 through Caltrans-9).

The first Caltrans comment cited in this comment is from Final EIR Comments Caltrans-7 and Caltrans-8. The comment claims that Caltrans identified significant impacts for which the Draft EIR identified no mitigation measures. This claim is inaccurate. Caltrans raised a concern that there could be a secondary impact associated with implementation of Mitigation Measure 3.14-3(c) which could require widening of the off-ramp. Analysis was presented in the Response to Comment Caltrans-7 in the Final EIR responding to Caltrans' concern and demonstrating that there would not be a secondary impact and, as such, widening of the off-ramp would not be required.

The second Caltrans comment cited in this comment is Final EIR Comment Caltrans-9. The comment claims that Caltrans' comment demonstrates that the Draft EIR failed to identify all feasible mitigation measures. This claim is inaccurate. Final EIR Response to Comment Caltrans-9 describes in detail the reasons why the City concludes that no

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feasible mitigation measures are available at the three locations identified in Caltrans' comment. The response explains that the City investigated the feasibility of improvements at all three of these onramps, found that the improvements were infeasible, and explained why. The reasons include interference with existing HOV lanes, creating unsafe "trap" situations for certain lanes, creating unsafe intersection lane-shifts, inadequate right-of-way, loss of parking, physical constraints such as adjacent drainage channels, and disruption of existing bus stops. As the response explains, the City investigated the feasibility of these improvements in close consultation with both Caltrans and the City of Hawthorne. Although these improvements were found to be infeasible, the City identified the following mitigation measure to address impacts at the eastbound on/off ramps at I-105 and 120th Street:

**Mitigation Measure 3.14-2(p)**

*The project applicant shall work with the City of Inglewood, the City of Hawthorne, and Caltrans to investigate the feasibility of adding a second eastbound left-turn lane or extending the length of the single existing left-turn lane on 120th Street at the I-105 Eastbound On/Off Ramps within the existing pavement width and, if determined to be feasible within the existing pavement width, to implement the improvement.*

This measure has been incorporated into the MMRP. (See Final EIR, p. 4-28.) Because the feasibility of this measure is uncertain, and depends on determinations made by other agencies, the impact it addresses remains significant and unavoidable. (See Final EIR, p. 3-18 [Response to Comment Caltrans-9].)

Silverstein-23 This comment restates Final EIR, Chapter 3, Comments Caltrans-10. However, the comment does not reflect the response that was provided to this Caltrans comment in the Final EIR. The City and its transportation experts coordinated with Caltrans staff before and during the public comment period to address their comments. A full response to this Caltrans comment is provided in the Final EIR (see Final EIR, Chapter 3, Response to Comment Caltrans-10).

The comment claims that the Intersection Control Evaluation (ICE) screening should have been conducted as part of the Draft EIR to demonstrate the viability of the intersection modifications. This comment indicates a misunderstanding of the Caltrans project development process. As discussed in Final EIR Response to Comment Caltrans-10, Mitigation Measures 3.14-2(g) and 3.14-2(j) specify that implementation of the mitigation measures would require complying with the Caltrans project development process as local agency-sponsored projects. Conducting the ICE screening at these locations is a part of the Caltrans project development process. During development of the Draft EIR, the potential viability of the mitigation measures as proposed was discussed with Caltrans staff to ensure that the mitigation measures included in the Draft EIR met the CEQA standard for feasibility.

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- Silverstein-24 This comment asserts that major shakeups in transit service will “vastly affect the baseline assumptions, causing vague and imprecise mitigation measures”. The disclosure in the Final EIR related to the timing of both minor and major shakeups in transit service by no means suggests that baseline transit service assumptions were inappropriate or that the mitigation measures were therefore imprecise. Had Metro thought this was the case, they likely would have included such a comment in their comments on the Draft EIR. The Metro comment appears to be advisory in nature, to allow the general public to know that both minor and major transit service shakeups occur in December and June.
- There is no basis to support this comment’s assertion that there would be a “one-year impact,” which would be caused by the Metro rail operating plan C-3 being for one year (and not two years). At the time the Draft EIR was prepared, rail operating plan C-3 was the Metro Board’s adopted plan. The frequency for which this plan is updated is largely irrelevant, as it was the only plan endorsed by the Metro Board at the time the analysis was prepared. In other words, no other rail operating plan would have been more reasonable to have assumed in place for baseline conditions. While it is true that rail operating plan C-3 may be modified annually, that does not imply that the plan would not be operational and therefore be considered an inappropriate travel choice to assume in the baseline analysis.
- Contrary to the commenter’s opinion, no data provided in the Final EIR regarding the frequency of updates to rail operating plan C-3 rises to the level of significant new information under CEQA Guideline §15088.5(a).
- Silverstein-25 This comment asserts that the baseline analysis assumed more train capacity than realistically exists and therefore understated the transit impacts of the Proposed Project. The Draft EIR includes a lengthy discussion of planned Metro light rail system improvements that would be in place prior to the opening of the Proposed Project. Those planned improvements will result in more system capacity than currently exists. When analyzing train capacity, the Draft EIR relied the best available information which was that included in the Metro Board’s adopted rail operating plan C-3. Detailed evaluations were performed for both weekday and weekend pre-event and post-event peak hour conditions based on the train capacities and car capacity thresholds applied by Metro during each of these four specified time periods. This comment does not provide any documentation to support a conclusion that the transit impacts of the Proposed Project were understated.
- Silverstein-26 The possible future grade-separation project for the K Line at the Florence Avenue/Centinela Avenue intersection would not affect operations during events at the Proposed Project because that construction would be complete prior to the fall 2024 opening of the Proposed Project. It is possible that construction of the grade-separation project, if it were expeditiously designed, approved, and funded, could coincide with

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construction of the Proposed Project. This type of potential occurrence is precisely why a Construction Traffic Management Plan was recommended as Mitigation Measure 3.14-15 in the Draft EIR. That plan would be required to include identifying haul routes and arrival/departure information of trucks, and strategies to reduce employee and delivery trips during AM and PM peak hours. The plan would be required to be submitted to emergency service and transit providers so as to minimize any overlapping effects of concurrent construction activities associated with cumulative projects over which the City may have no authority. Thus, the Construction Traffic Management Plan is the mechanism to be used to avoid and minimize any effects associated with concurrent construction activity.

Furthermore, the Draft EIR already determined that cumulative construction impacts would be significant and unavoidable, and concurrent construction of the K line and the Centinela grade separation project would not materially affect this conclusion given the distance between these projects and the Project Site (1.5 to 1.75 miles), with different access routes for trucks, etc.

- Silverstein-27 The comment requests more specificity regarding shuttle bus operations during events. Final EIR, Chapter 3, Response to Comment Metro-19 contains the requested information (see Final EIR pages 3-236 and 3-237). This information provides more insight into shuttle bus operations (to the extent that information can currently be known). Contrary to the commenter's assertion, that information does not cause any new impacts that require mitigation.
- Silverstein-28 This comment raises issues that were raised in Final EIR, Chapter 3, Comments Metro-20 and -21, and asserts that impacts of shuttle buses at rail stations were not addressed in the Draft EIR and could have been considered significant impacts. Final EIR Responses to Comments Metro-20 and Metro-21 (Final EIR, Chapter 3, pages 3-237 and 3-238) describe why bus staging at rail stations would need to be evaluated in coordination with Metro at a later date. Final EIR Response to Comment Metro-20 indicates that given the number of rail stations and buses to be in circulation during major events, no more than two buses are expected to be present at a given rail station at a given point in time. This clearly would not rise to the level of a significant impact given this modest number of staged buses and typical presence during off-peak periods. The commenter is referred to Final EIR, Chapter 3, Responses to Comments Metro-20 and Metro-21 for more information.
- Silverstein-29 Comment 29 asserts that using an adjusted baseline violates CEQA. The comment further asserts that the cumulative impacts of the Clippers Project together with the NFL project evaded review in the IBEC EIR. Neither of these claims is correct.
- Contrary to the implication of the header of this comment ("Los Angeles Department of Transportation Comment re Incorrect Baseline."), LADOT's comment letter on the Draft EIR explicitly agreed with use of the Adjusted Baseline. This is included in the

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cited portion of that letter. The comment misleads by citing the LADOT comment letter and selectively omitting the first phrase in the quoted paragraph, which reads “[g]iven that the Proposed Project is not expected to be complete and operational until mid-2024, ...” This phrase is important because it sets the stage for the remainder of the quoted comment by showing that LADOT understands the basis for analyzing project impacts against an adjusted baseline rather than against an existing baseline.

The comment states that the use of an adjusted baseline was a legal error. This statement is incorrect. Under CEQA, the environmental setting as it exists at the time the agency commences the environmental review process “normally” serves as the baseline condition against which the project’s impacts are measured. (CEQA Guidelines, § 15125, subd. (a).) In this case, however, the use of physical conditions as they existed in early 2018 as the baseline would be misleading. That is because conditions at and around the Project site are dynamic, such that the physical setting will differ from those that existed in early 2018 by the time the Proposed Project commences operations in 2024. The current circumstances are therefore an instance in which a departure from the “normal” rule is warranted, a principle that has been recognized and endorsed by the California Supreme Court. (See *Neighbors for Smart Rail v. Exposition Metro Line Const. Auth.* (2013) 57 Cal.4th 439.)

The comment states that the Draft EIR analyzed project impacts against “an adjusted baseline of 2021.” The statement is factually incorrect. The Draft EIR analyzes impacts using an adjusted baseline of conditions that will exist after the Adjusted Baseline projects are constructed. The reasons for using an adjusted baseline, as well as the land use, transit, and roadway assumptions in the Adjusted Baseline, are explained in detail in Sections 3.0.5 and 3.14.2 of the Draft EIR (see pages 3-9 to 3-11, and pages 3.14-53 to 3.14-56). As stated on page 3.14-56 of the Draft EIR, “[b]ecause the HPSP projects and transportation projects listed above are all approved, funded, and/or under construction, it would be misleading to analyze the Proposed Project’s transportation impacts without taking into account these changes.” This approach is conservative. At that time, SoFi Stadium is expected to commence operations, and listed HPSP projects will have been completed. The transportation setting will therefore consist of more traffic and congestion than existed in early 2018, when the environmental review process for the Proposed Project commenced. The use of an adjusted baseline against to measure the Proposed Project’s impacts therefore results in more impacts than would occur if the “normal” approach to the environmental setting were used. It should be noted, moreover, that the EIR does describe existing conditions based on actual traffic counts performed and data obtained during the environmental review process.

Finally, the comment states that “the cumulative impacts of the Clippers Project together with the NFL project were not analyzed in the NFL project and evaded review in the IBEC EIR. ...” The Proposed Project was not proposed until June 2017 and could not

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have been anticipated at the time that the NFL Stadium analyses were undertaken. However, the comment that the Draft EIR did not analyze the combined impact of events at the NFL Stadium and at the Proposed Project is incorrect. As described on pages S-31, 3.14-8, and elsewhere in the Draft EIR, the analysis fully evaluates five concurrent or overlapping event scenarios, including a sold-out major event at the Proposed Project and sold-out NFL football game on a weekend day, and a sold-out major event at the Proposed Project and 25,000-person event at the NFL Stadium on a weekday evening. Each of those concurrent event scenarios was also fully analyzed with an overlapping event at The Forum. These analyses are presented in Section 3.14.5 of the Draft EIR.

Silverstein-30 The comment selectively quotes from Final EIR, Chapter 3, Comment LADOT-5 that addresses the Event Transportation Management Plan (Event TMP) (Draft EIR Appendix K.4) and mistakenly characterizes LADOT's letter as stating that the Draft EIR "understated the cumulative additional traffic of the Proposed Project together with the NFL stadium ..." In fact, LADOT's comment letter recognizes that "much of the analysis conducted has significant overlap" and provides its comments to "ensure that mitigation measures fully address potential project impacts." To that end, LADOT requested that inclusion of LADOT staff in required planning for event traffic management, particularly when concurrent events are held at the Proposed Project and the NFL Stadium. As stated in Response to Comment LADOT-3 in the Final EIR, planning for traffic management during overlapping or concurrent events at the Proposed Project and nearby event venues is anticipated in the Draft Event TMP. In the Final EIR, Responses to Comments LADOT-5 and LADOT-9 acknowledge the importance of interagency coordination and revised the Draft Event TMP in the Draft EIR to specifically include collaboration with LADOT (see Appendix K.4 in the Final EIR). Thus, the comment that there is no mandatory enforceable commitment for applicant to collaborate with LADOT is incorrect.

In addition, the City consulted with LADOT during preparation of the Final EIR regarding funding for ITS improvements at intersections in Los Angeles with unmitigated significant impacts. This collaboration led to development of an additional mitigation measure, described in Response to Comment LADOT-10 and included in the MMRP on page 4-71 of the Final EIR, which provides LADOT with a one-time contribution for ITS improvements prior to issuance of a Certificate of Occupancy.

The comment interprets the quoted comments from the LADOT letter to mean that mitigation of event traffic has been improperly deferred. In fact, as stated in on page 44 of the Draft Event TMP (Appendix K,4 of the Draft EIR), it "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

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available.” As set forth in the MMRP, planning and design of the Event TMP must commence at least 24 months prior to the anticipated completion date for the arena (currently estimated to occur in July 2024 and to be finalized at least six months prior to the issuance of a certificate of occupancy for the arena). Thus, there is a defined timeline for preparation of the Event TMP for the Proposed Project, and a process for including LADOT and other agencies. The comment did not identify any flaws or omissions in the Draft EIR that require the disclosure of missing information, new impacts, new mitigation measures or recirculation.

Silverstein-31 The comment asserts that the lack of disclosure of the County’s proposed traffic enhancements “fully questions the validity of the Draft EIR’s calculations.” As discussed in the Final EIR Response to Comment LACPDW1-2, the County did not make the City of Inglewood aware of these proposed improvements when consulted earlier in the EIR process, nor between that time and publication of the Draft EIR. The County Public Works’ comment simply requests disclosure, which was accomplished in the Final EIR. The County also requested assurance that de-facto right turn lanes were not assumed at the intersection of Century Boulevard/Gramercy Place. As noted in Final EIR Response to Comment LACDPW1-2, the analysis conducted in the Draft EIR did not assume the presence of de-facto right-turn lanes.

The referenced comment from LACDPW raises two details of the complex and extensive analysis of transportation and circulation in the Draft EIR. In suggesting that these detailed issues, fully addressed in Final EIR Response to Comment LACDPW1-2, represent a fundamental failure to fully disclose the impacts of the Proposed Project the commenter does not accurately convey the context in which the CEQA Guidelines use the phrase “good faith effort at full disclosure”. This phrase is not part of CEQA itself, but is used three times in the CEQA Guidelines, in each case to reflect that there are limits to what is required under CEQA. Guideline §15003(i) augments the policies established in CEQA by the Legislature found in PRC §§21000, 21001, 21002, and 21002.1, by adding policies declared by California courts, stating that “CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. Guideline §15151 reflects this policy in providing guidance on the standards of review for an EIR, stating that “[t]he courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.” In Guideline §15204, regarding the focus of review of a Draft EIR, it is stated that “[w]hen responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information provided by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” Thus, the reference to “good faith effort at full disclosure” is used in the CEQA Guidelines is to act as a moderator to reviewers, like the commenter, who may want to imply that anything short of perfection or inclusion of everything that any commenter may request represents a failure to

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comply with CEQA. Under both Guideline §15151 and §15204, the EIR has made a good faith effort at full disclosure of the impacts of the Proposed Project.

Silverstein-32 As discussed in Final EIR, Chapter 3, Response to Comment LACDPW1-2, the County did not make the City of Inglewood aware of these potential improvements when consulted earlier in the EIR process, nor between that time and publication of the Draft EIR. The LACDPW comment simply requests disclosure, which was accomplished in the Final EIR.

Silverstein-33 The comment noted was made by the Los Angeles County Department of Public Works and is addressed in the Final EIR, Chapter 3, in Response to Comment LACDPW-1-3. As noted in the response, the comment requested the shown change to the Regulatory Setting discussion in Draft EIR Section 3.7, Greenhouse Gas Emissions, in order provide additional specificity regarding SB 1383. There was no implication in the comment that the additional specificity related to an inadequacy in the analysis of GHG emissions in the Draft EIR, including methane emissions.

The comment states that oil well (API: 0403720016) is 449.6 feet from the Project Site and states it was “reabandoned in 2016”. The Draft EIR included a review of the DOGGR (now CalGEM) well finder website which currently indicates that Well 0403720016 has been plugged and abandoned (see Draft EIR, Section 3.6, page 3.6-6). Therefore, it is no longer in use and has been appropriately plugged (i.e., filled with cement) and capped such that any chance for methane gas emissions would be considered negligible.

As referenced by the comment, the Draft EIR accurately discloses that the closest known oil production well is approximately 1,200 feet northeast of the Project Site, and that the Project Site is not located within 300 feet of an oil or gas well or within 1,000 feet of a methane producing site (see Draft EIR, Section 3.6, page 3.6-9). The well that is located 1,200 feet from the site is categorized as “idle.” The use of the term “idle” in the Draft EIR for the status of the nearest oil well refers to wells that are not currently actively used and have not been plugged but are typically capped, meaning they are sealed at the surface. At a distance of 1,200 feet from the Project Site, a capped idle well would not be considered a significant risk at this distance for risk of exposure for visitors or workers at the Project Site. The Proposed Project would not otherwise exacerbate or have any effect on any potential hazards that may or may not be present at the location of this existing idle well. As is explained in the Draft EIR, “the potential for explosive methane gases impacting the Project site is low” (see Draft EIR, Section 3.6, page 3.6-9).

The statement that “the DEIR is non-specific as to whether any of the Project’s proposed 28-acre site is located within a methane zone” is misleading. In fact, as described above, the comment from LACDPW did not pertain to the analysis in the Draft EIR and was



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merely requesting additional specificity to be added to the Regulatory Setting discussion in Section 3.7.

Silverstein-34 As addressed above, the comment from the LACDPW pertaining to methane emissions related to the description of SB 1383 in the Regulatory Setting subsection of Section 3.7, Greenhouse Gas Emissions. The LACDPW found no inadequacy in the discussion of methane hazards and proximate oil wells in Section 3.8, Hazards and Hazardous Materials. The Draft EIR accurately discloses the closest production well to the Project Site at 1,200 feet and the fact that the well is listed as idle. The well mentioned in the comment (API: 0403720016) is not within 300 feet of the site, consistent with what is stated in the Draft EIR. This well is also plugged, meaning it has been filled with cement and does not provide a potential preferential pathway for methane. The Project Site is also not within 1,000 feet of a methane producing zone. Therefore, the Draft EIR logically and accurately concludes that the impact related to potential exposure hazards of methane gas is less than significant.

The greenhouse reduction goals are mentioned in the Draft EIR on page 3.7-23 under the discussion of AB 1383 and Section 3.7 of the Draft EIR provides the analysis of potential impacts related to greenhouse gases consistent with CEQA Guidelines. However, these reduction goals are a separate issue from the potential hazards related to any subsurface methane gas. As provided above, there is no data to suggest that there is a significant risk of exposure to methane hazards at the Project Site.

Silverstein-35 The comment asserts that the Draft EIR failed to disclose and analyze pedestrian flows. This assertion is inaccurate. Pedestrian flows are analyzed in the Draft EIR (see Draft EIR, Section 3.14, pages 3.14-132 through 3.14-136). The analysis in the Draft EIR identified a potential significant impact (see Impact 3.14-13) and described a mitigation measure that would reduce the identified impact to a less-than-significant level (see Mitigation Measure 3.14-13).

Final EIR Comment LACDPW1-6 requested clarification of the pedestrian flow management proposed, particularly in the southwest corner of the Project Site. As noted in Final EIR Response to Comment LACDPW1-6, the Event Traffic Management Plan required in Mitigation Measure 3.14-2(a) was provided in draft form in Appendix K.4 to the Draft EIR, and both described and illustrated specific measures to manage pedestrian flows at the southwest corner of the Project Site, including traffic control officers to manage vehicular/pedestrian interfaces during pre-event and post-event periods and a pedestrian bridge across Prairie Avenue. As such, this information was fully disclosed in the Draft EIR.

Silverstein-36 The comment asserts that Final EIR Comment LACDPW1-7 identifies a flaw and error in the Draft EIR's methodology. Final EIR Response to Comment LACDPW1-7 responds fully to the LACDPW comment. This response explains that the Draft EIR considers the potential for impacts at County intersections operating at LOS C, D, E and

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F for all County intersections analyzed for impacts during the typical AM and PM peak hours, as required by the County. It further explains that the City of Inglewood, as the lead agency, adopted different criteria for impacts during the evening pre-event and post-event hours, and the logic for that criteria (see Draft EIR page 3.14-62). The response further explains that LA County's preferred Intersection Capacity Utilization (ICU) methodology was used at all County intersections analyzed during the typical AM and PM peak hours and at most County intersections analyzed during the pre-event and post-event hours. The response explains that the exception was those intersections on or adjacent to the West Century Boulevard and South Prairie Avenue corridors where microsimulation modeling was appropriately used to properly capture the effects of coordinated signal timing plans, closely spaced intersections, queue spillbacks, imbalanced lane utilization, lane blockages, pedestrian flows, pick-up/drop-off events, and other considerations that are important to understand and account for in the assessment of the types of traffic flows created before and after major events (also see pages 3.14-18 and 3.14-19 in the Draft EIR). This is not a flaw but an improvement in the analysis methodology for those intersections. Finally, the response explains that mitigation measures are identified in the Draft EIR for significantly impacted locations in the County where such measures are feasible, and that a draft Event Traffic Management Plan was included as appendix K.4 to the Draft EIR.

In addition, in response to Comment LACDPW1-7, the City revised the Event TMP to provide for coordination with LACDPW with respect to streets managed by that department. (See Final EIR, pp. 3-36 – 3-39.)

The comment states that the Transportation Demand Management (TDM) program for the Proposed Project is required to include specific measures. The specific measures to be included in the TDM program are listed in Mitigation Measure 3.14-1(a) on pages 3.14-191 to 3.14-192 of the Draft EIR and in Mitigation Measure 3.14-2(b) on pages 3.14-195 to 3.14-199 of the Draft EIR.

Silverstein-37 The comment states that the analysis of GHG emissions in the Draft EIR is not based on substantial evidence, and cites comments on the AB 987 certification process, made six months prior to the Governor's certification. As described in Final EIR, Chapter 3, Response to Comment NRDC-2, the AB 987 certification process resulted in specific commitments to local direct GHG emission reduction measures which, if the Proposed Project is approved, are required to be imposed as conditions of approval. EIR Mitigation Measure 3.7-1(b) does not specifically mandate these particular measures, because it was not required to do so under CEQA in order to achieve net zero emissions, which would reduce Impact 3.7-1 to insignificance. Mitigation Measure 3.7-1(b) is consistent with the AB 987 reduction measures, and both Mitigation Measure 3.7-1(b) and the AB 987 commitments are intended to achieve net zero emissions under their respective methodologies.

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The entirety of the analyses of GHG emissions undertaken as part of the preparation of the EIR are based on substantial evidence in the Draft EIR Appendices and elsewhere in the record of proceedings, which has been posted and available for public review throughout and following the Draft EIR public review period. The comment includes no specific criticisms or challenges to the evidence contained in the Draft EIR Appendices, the Final EIR Appendices, or elsewhere in the publically-available record. In addition, the AB 987 analyses were based on extensive evidence provide to the California Air Resources Board (CARB) and subject to public review and careful and extensive review by CARB air pollution experts.

Silverstein-38 The comment states that Culver City had requested several extensions of the public comment period and submitted its comments on April 1, 2020. As stated in the introduction to the responses to the comment letter from Culver CityBus, on page 3-243 of the Final EIR, the letter was received by the City of Inglewood on March 31, 2020. The public review period for the Draft EIR was 89 days, from December 27, 2019 through March 24, 2020, as described above in Response to Comment Silverstein-5, as well as in Final EIR Response to Comment SCAQMD-1.

The comment incorrectly states that Culver City is adjacent to Inglewood. The municipal boundaries of the two cities do not adjoin. The comment goes on to claim that Culver City “will be immediately and negatively impacted by the proposed Project.” This statement is not supported by evidence in the Draft EIR, by information in the comment letter from Culver CityBus, nor by information in this comment.

The comment states that Culver CityBus’ comment letter raised the issue of sidewalk width, and quotes the sixth comment in the Culver CityBus letter adding emphasis to the suggestion that “the Project should consider widening the sidewalks within the vicinity of the project site to accommodate the thousands of attendees for Clippers games and other big events.” The comment states that “the DEIR (sic) may not simply respond to the Culver City comment and specify the width of the sidewalk, without addressing concerns and recirculating the DEIR for public review and comment.” In fact, the Draft EIR and the Final EIR do much more than specify sidewalk widths. Pages 3.14-132 through 3.14-136 present a detailed, quantitative evaluation of the pedestrian system around the Proposed Project site. Final EIR Response to Comment Culver CityBus-6 provides a detailed response to the issues raised about sidewalk widths and the Draft EIR included a detailed analysis of pedestrian access at the site and concludes that, as mitigated, impacts to pedestrian access would not be significant. Further information is provided in the Final EIR Responses to Comments Channel 30 through 33. Because there is no need to provide additional mitigation by widening the sidewalks beyond what would be included as part of the Proposed Project, no modifications to the streets would occur that are not disclosed and analyzed in the Draft EIR. No changes to the Draft EIR or Final EIR are necessary.

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The comment refers new information about a separate Billboard Project and relates it to its comment about the sidewalks adjacent to the Project Site. As explained in Responses to Comments Silverstein-1 and Silverstein-41, and stated on Final EIR page 2.13, the Billboard Project was proposed by WOW Media, an applicant different from and unaffiliated with the applicant for the Proposed Project, and was not a part of the Proposed Project. Further, the Billboard Project application is no longer being considered by the City. Thus, the Billboard Project, prior to its withdrawal was independent from and not part of the Proposed Project, and would not have met the standard for piecemealing or segmentation under CEQA; now that the Billboard project has been withdrawn, the issue is moot. Please see Response to Comment Silverstein-41.

Silverstein-39 This comment restates Final EIR, Chapter 3, Comment-Culver CityBus-7. However, the comment does not reflect Response to Comment CulverCityBus-7 that was provided in the Final EIR. Comment Silverstein-38, above, states that the Culver CityBus letter raised the issue of “the need for bicycle lanes.” In fact, as shown in the citation in Comment Silverstein-39, the Culver CityBus letter merely suggests that “the project should also consider adding bike lanes on South Prairie Avenue and West Century Boulevard.” As stated in the Final EIR Response to Comment Culver CityBus-7, Final EIR page 3-245, the Draft EIR estimated that fewer than 1% of attendee trips would be made by bicycle. No bike facilities are planned by the City of Inglewood on streets adjacent to the Project Site, including on the streets adjacent to the Project Site. The comment suggests that various items suggested in the Culver City letter would have their own secondary impacts if implemented, which were not studied in the Draft EIR. These items are not needed as mitigation for the Proposed Project and are not part of the Proposed Project and so did not need to be studied for secondary impacts. No new significant impacts are identified by this comment. Please see Response to Comment Silverstein-40 for an explanation of why recirculation is not required in response to this letter.

Silverstein-40 As described in Responses to Comments Silverstein-10 through Silverstein-39, there are no significant impacts of the Proposed Project that were not properly assessed in the Draft EIR. The vast majority of the comments were originally made by agencies on the Draft EIR. The Final EIR Responses to Comments provided thorough responses to those comments. In many instances, those responses were accompanied by follow-up meetings and other contacts with the agencies making the comments.

Comments Silverstein-10 through Silverstein-39 do not identify any significant impacts that were not disclosed in the Draft EIR, do not identify any impacts that are substantially more severe than disclosed in the Draft EIR, do not identify any feasible mitigation measures that were not identified and required of the Proposed Project to avoid or substantially lessen significant impacts that the applicant declined to adopt, and do not identify any feasible alternatives that would avoid or substantially lessen significant impacts of the Proposed Project that the applicant declined to adopt. Those

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comments also fail to identify any ways in which the Final EIR fails to provide good faith, complete, and accurate responses to comments made on the Draft EIR. CEQA Guideline §15088.5 identify the criteria which require recirculation of the Draft EIR prior to certification; Comments Silverstein-10 through Silverstein-39 do not identify any significant new information requiring recirculation. As such, neither the Draft EIR nor the Final EIR require circulation for additional review and comment.

Silverstein-41 The comment states that the City has engaged in piece-meal environmental review of the Proposed Project. According to the comment, the City should have analyzed, as part of the Proposed Project, the following, additional proposals: (1) a proposal by WOW Media to install two motion illuminated billboard signs; (2) the “hotel project”; (3) the ITC / General Plan Circulation Element; (4) ongoing road-improvements in and around the Proposed Project site; and (5) the City proposal to adopt a General Plan Environmental Justice Element. (Silverstein letter of June 16, 2020, pp. 39-41.)

*Timeliness of Comment.* The comment states that these proposals were not known to the commenter prior to March 24, 2020, when comments on the Draft EIR were due. The comment cites Public Resources Code section 21189.55 in support of this contention. The citation is not relevant to the Proposed Project. Section 21189.55 was enacted in 2018 as part of Assembly Bill 1826. That legislation applies to “Capitol Building Annex and State Office Building Projects.”

The comment states that none of these proposals were known or knowable until after March 24, 2020. This statement is not credible. Specifically:

- The Billboard proposal commenced environmental review in August 2019. At that time, the City circulated an initial study and proposed mitigated declaration for the project. In any event, on May 22, 2020, the City Manager informed the Billboard applicant that the City would not be moving forward with the proposal. The proposal is therefore no longer proposed or pending.
- The proposed hotel is part of the project, is included in the project description, and is analyzed throughout the IBEC EIR. (See, e.g., Draft EIR, pp. 2-45 – 2-46 [description of proposed hotel]; Draft EIR, Table 3.14-40 [estimate of vehicle miles traveled associated with hotel].) Despite this fact, the author did not submit a comment on this issue (or any other issue) during the Draft EIR comment period.
- The environmental review process for the ITC commenced on July 18, 2018, when the City issued a Notice of Preparation and Initial Study. The City also conducted a scoping meeting for the project. The author did not submit a comment on the NOP or participate in the scoping meeting. The IBEC Draft EIR addresses the ITC. (IBEC Draft EIR, pp. 3.14-140 – 3.14-141.) The author did not submit comments on the IBEC Draft EIR on this or any other topic.

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- Roadwork along the West Century Boulevard corridor has been ongoing since 2015. The work consists of upgrading traffic control systems, improving landscaping, and other related improvements along this corridor. The work has been visible and known for years. Phase 2 of this work is currently underway; it is scheduled for completion in August 2020. The work on South Prairie Avenue consists of installing fiber-optic cable and road resurfacing. The City recently completed this work along this segment of South Prairie Avenue.
- The City has been actively engaged in developing a proposed Environmental Justice (EJ) Element since October 2018. These efforts commenced in January 2019. They included community workshops, focus groups, and outreach at local festivals and events on multiple occasions in 2019. The author did not participate in these activities.

In light of these facts, the City does not agree with the statement that these proposals were unknown and unknowable prior to March 24, 2020. Moreover, under CEQA, the City is not required to provide a written response to comments submitted after the close of the comment period on the Draft EIR. (CEQA Guidelines, § 15088.) Nevertheless, the City provides the following, written response to this comment.

*General Principles.* Under CEQA, a “project” is “an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” (Pub. Resources Code, § 21065.) “Project” includes “the whole of an action.” (CEQA Guidelines, § 15378, subd. (a).) In general, the lead agency must analyze fully each “project” in a single environmental analysis. “This principle is designed to ensure ‘that environmental considerations do not become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences.’” (*Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263, 283-284; *Aptos Council v. City of Santa Cruz* (2017) 10 Cal.App.5th 266, 278 (“*Aptos Council*”).) The failure to consider “the whole of the project” is a CEQA violation often referred to as “piecemealing.” (*Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1222 (“*Banning Ranch*”).)

The California Supreme Court developed a legal test for analyzing piecemealing issues. Under this test, an “EIR must include an analysis of environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” (*Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376, 396 (“*Laurel Heights*”).) The “key word” in this test is “consequence.” (*Banning Ranch, supra*, 211 Cal.App.4th at p. 1225; see also *Aptos Council, supra*, 10 Cal.App.4th at p. 282 [“key term here is ‘consequence’”].) Thus, a central issue is whether the agency’s

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approval of the initial project will in some respect lead to approval of the latter or separate proposal.

In this case, the comment states that the City has “piece-mealed” its environmental review, citing the five specific examples listed above. The comment states that the City ought to have analyzed these five proposals as part of the IBEC in a single EIR. Each is discussed below.

*Billboards Project.* As noted above, on May 22, 2020, the City notified the applicant that it would not be going forward with the WOW Billboards proposal. The proposal is not pending, and is neither part of the Proposed Project, nor otherwise being considered by the City.

Even if the Billboards project were still pending, however, it would not be part of the IBEC proposal. The Billboards project and the IBEC are both located in the City of Inglewood, and the City is the lead agency for both proposals. In addition, the Billboards project would be located in close proximity to the IBEC, near the intersection of South Prairie Avenue and West Century Boulevard. The Billboards project, however, was proposed by WOW Media. WOW Media has no direct or indirect relationship with Murphy’s Bowl, the applicant for the IBEC proposal.

WOW Media proposed the Billboards project in connection with the impending opening of SoFi Stadium in the Hollywood Park Specific Plan area. The Billboards proposal was not contingent on the Proposed Project. Nor does the Proposed Project depend on the withdrawn Billboards proposal; instead, the Proposed Project includes its own signage, including moveable message signs, that are integrated into and fully analyzed as part of the Proposed Project. (See, e.g., Draft EIR, Chapter 3.1 – Aesthetics – analyzing lighting impacts of signs incorporated into IBEC.)

The comment appears to be based on the assumption that the WOW Media Billboards are part of, and would be integrated into, the Proposed Project. This assumption is incorrect. The WOW Media Billboards proposal consisted of two proposed billboards. Specifically:

- One billboard was proposed to be located at approximately 4027 West Century Boulevard, on the north side of West Century Boulevard. This site is west of the intersection with South Prairie Avenue, across the street from the Proposed Project site’s West Parking Garage. This location is not part of the Proposed Project site.
- One billboard was proposed to be located in public right-of way between 10204 South Prairie Avenue and 10200 South Prairie Avenue. This location is on the east side of South Prairie Avenue, south of the intersection with West 102<sup>nd</sup> Street. This location is adjacent to, but is not part of, the Proposed Project site. Rather, the location is southwest of the Arena, south of the pedestrian bridge that will span South Prairie Avenue between the Arena and the West Parking Garage.

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The comment states that the Billboard project will be “placed on property apparently soon to be owned or controlled by Murphy’s Bowl, pursuant to the draft Disposition and Development Agreement. (Exh. 39 at p. 21 [Disposition and Development Agreements].)” (Silverstein June 16, 2020, letter, p. 40.) As explained above, this statement is incorrect. Neither billboard was proposed to be located on land that has been proposed to be part of the Project Site or on land that has been proposed for disposition.

Case law involving analogous facts makes it clear that, even if the Billboards proposal remained pending, the proposal is not part of the Proposed Project. *Paulek v. California Department of Water Resources* (2014) 231 Cal.App.4th 35 is on point. In that case, the Department of Water Resources (“DWR”) devised a three-part plan to address seismic risks at a dam in Riverside County: (1) structural improvements to the dam itself; (2) replacing an “outlet tower” (a structure that diverts water to users and also allows for emergency releases); and (3) constructing an “emergency outlet extension” to channel water released during emergencies away from residential development in a downstream floodplain. The Draft EIR considering all three portions of the plan, but the Final EIR removed the emergency outlet extension; DWR wanted to analyze the emergency outlet extension in a separate CEQA process to allow for examination of additional alternatives. The court held that the removal of the emergency outlet extension from the EIR did not impermissibly segment environmental review. The extension was neither a foreseeable consequence, nor a future expansion, nor an integral part, of the dam remediation project. Instead, the extension served a different principal purpose: preventing flood damage during an emergency release. (231 Cal.App.4th at pp. 45-48; see also *Banning Ranch, supra*, 211 Cal.App.4th 1209, 1225 [EIR analyzing proposed park did not need to include concurrent development proposal on adjacent land, even though park and development would share main access road; although building the park’s access road could be “reasonably seen as easing the way” for the development, the construction of the road was “only a baby step toward” the development].)

These cases show that temporal or geographic proximity is not enough to require two proposals to be analyzed as parts of a single project. Instead, in order to be considered part of a single project, the proposals must be causally or legally connected in some manner, such that approval of one begets the other. That causal or legal link is missing here. That is particularly true given that the Billboards project is no longer a pending proposal. Thus, there is no pending application to which to forge a link.

The Billboard project was proposed to be located on the north side of West Century Boulevard, and on the east side of South Prairie Avenue. Both locations have never been proposed as part of the Proposed Project. In any event, as noted above, the City is not moving forward with the Billboard project, and the Billboard project is no longer pending.



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*Hotel.* As noted above, the proposed hotel is part of the Proposed Project, is included in the project description, and is analyzed throughout the IBEC EIR. (See, e.g., Draft EIR, pp. 2-45 – 2-46 [description of proposed hotel].) For this reason, the claim that the City has performed piecemeal review is incongruous. The City has never taken the position that the hotel is not part of the project. It is and is analyzed as such.

The comment states that the EIR provides insufficient details to analyze the Hotel component of the Proposed Project. (Silverstein June 16, 2020, letter, p. 41.) This statement is incorrect. The EIR consistently describes and analyzes the Hotel as follows:

Proposed uses consist of “[h]otel rooms, lobby area, administration offices, support areas, and parking.” (Draft EIR, Table 2-2, p. 2-18.)

Up to 150 hotel rooms. (Draft EIR, Table 2-2, p. 2-18.)

“The hotel could include amenities such as a lobby, business center, a fitness room, a guest laundry facility, a market pantry, and/or an outdoor gathering area. The hotel would not include meeting spaces or restaurant services. The hotel would be approximately six stories, with a maximum height of approximately 100 feet.” (Draft EIR, p. 2-45.)

The EIR provides sufficient information to analyze the impacts of the Hotel as part of the Proposed Project. Please see Response to Comment Silverstein-14. “Piece-meal” review has not occurred.

*ITC.* The Inglewood Transit Connector project (“ITC”) is a proposal to construct an Automated People Mover (“APM”) in public right of way. The APM would transport riders to and from the regional Metro Rail system to Downtown Inglewood, the Forum, the Los Angeles Sports and Entertainment District (“LASED”) which includes the new SoFi NFL stadium (currently under construction and scheduled to open in 2020), and the Proposed Project. The ITC would consist of an elevated APM system with dual guideways to allow for continuous trains to travel in each direction. The southern terminus of the ITC would be located at the intersection of West Century Boulevard and South Prairie Avenue.

The purpose of the ITC is to provide a convenient and efficient public-transit option to those travelling to or from the IBEC, SoFi Stadium, The Forum, or other destinations in the City along the proposed route. The ITC would provide a public transit option for those travelling from elsewhere in the Los Angeles region, in that the northernmost station would align with Metro’s Downtown Inglewood station on the Crenshaw/LAX line. ITC is a transportation project; its purpose and objectives are distinct from those associated with the IBEC. The ITC is proposed by the City, not by the Proposed Project applicant. While the ITC is designed to provide public-transit access to the IBEC (among other locations), the ITC is not located on the Proposed Project site. Rather, the

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ITC's southernmost station will be located near, but not within, the Proposed Project site. For these reasons, the ITC is not part of the IBEC.

The comment does not cite case law involving “piece-mealing” claims. One case that is often cited in support of such claims provides a helpful counterpoint. In *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, a developer applied to the city to construct a new home improvement center. In approving the project, the city adopted a condition of requiring the developer to relocate an adjacent roadway, as envisioned by the longstanding city and county plans. According to the Court of Appeal, “[o]ne way to evaluate which acts are part of a project is to examine how closely related the acts are to the overall objective of the project. The relationship between the particular act and the remainder of the project is sufficiently close when the proposed physical act is among the ‘various steps which taken together obtain an objective.’ [Citation.]” (155 Cal.App.4th at p. 1226; see also *id.* at p. 1228 [scope of project is determined by considering “whether the act is part of a coordinated endeavor”].) In this case, the developer’s objective was to open and operate a home improvement center in the city. “The commencement of business operations at the site is conditioned upon the completion of the realignment of [the road]. As a result, the road realignment is a step that [the developer] must take to achieve its objective.” (*Id.* at p. 1227.) Moreover, the realignment of the road and the home improvement center were related in time and physical location, and both activities would be undertaken by the same entity. These temporal and causal links indicated the activities were “part of a larger whole.” There were therefore “related acts that constitute a single CEQA project.” (*Ibid.*) Because the condition of approval required the developer to realign the store, it was immaterial whether the store and the road realignment had independent utility. (*Id.* at pp. 1228-1231.)

Here, functional links of this sort do not exist. The Proposed Project applicant is not required to construct or operate the ITC. The Proposed Project may benefit if the ITC is constructed, in that the ITC will provide Arena patrons with another option for accessing the site. But the IBEC is not dependent upon the ITC; the IBEC’s transportation plans have been designed without relying on the ITC. Instead, the IBEC incorporates a shuttle program connecting the IBEC to regional transit. (See IBEC Draft EIR, pp. 2-58 – 2-59; see also Final EIR, Appendix K.4 [Event Transportation Management Plan, including Transit Element].) Timing and funding for the ITC are uncertain, whereas the Proposed Project is scheduled to commence operations in 2024. The ITC proposal has a geographic scope that overlaps slightly with the Proposed Project, in that the southernmost station would be designed to serve as a public transit option for those travelling to or from the Arena, but the ITC is a linear proposal that stretches across the City, and has a project site that is entirely distinct from that of the Proposed Project. For these reasons, there is no credible evidence that the ITC should be considered part of the Proposed Project.

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The comment also states that the ITC is “relied upon” as a mitigation measure to address the Proposed Project’s transportation impacts. This statement is incorrect. The transportation analysis in the IBEC EIR does not assume that the ITC will be in operation and does not reduce vehicle trips based on the assumption that the ITC will be operational. The IBEC EIR explains why it would be inappropriate to assign trips to the ITC. (IBEC Draft EIR, pp. 3.14-140 – 3.14-141.) As the EIR explains, “[t]he mode split implications of the ITC were not considered due to the uncertainty of how it would be operated (i.e., hours of operation, headways, etc.).” (*Ibid.*) Thus, the proposal was too undeveloped and too uncertain to be cited and relied upon as a mitigation measure. The Proposed Project will instead provide a shuttle service connecting to nearby Metro stations. If the ITC comes to fruition, it may provide a link to regional transit that obviates the need for some of these shuttles. The Proposed Project does not, however, depend on that outcome.

*Public Works Improvements on West Century Boulevard and South Prairie Avenue.* Roadwork along the West Century Boulevard corridor has been ongoing since 2015. The work consists of upgrading traffic control systems, improving landscaping, and other related improvements along this corridor. Phase 2 of this work is currently underway; it is scheduled for completion in August 2020. The work was approved before the environmental review process commenced for the Proposed Project. The work will improve transportation conditions along, and the visual character of, the West Century Boulevard corridor. The work is unrelated to the Proposed Project.

The City is installing fiber optic cable along South Prairie Avenue as part of its program to upgrade the City’s ITS Network. The City recently completed this work along this segment of South Prairie Avenue. The City is also resurfacing portions of South Prairie Avenue as part of its ongoing maintenance of City streets. Neither project is related to the Proposed Project.

The comment states that the proposal to adopt a parking permit program is part of the Proposed Project. This statement is incorrect. Please see Response to Comment Silverstein-17.

*Environmental Justice Element.* The City Council approved the Environmental Justice Element on June 30, 2020. The Environmental Justice Element applies throughout the City, to all proposals, and not solely to one specific proposal or one particular area. The IBEC proposal is within the City and is therefore be subject to the Environmental Justice Element, but to no greater or lesser extent than any other development proposal. The record contains no evidence that approving the IBEC will be a reasonably foreseeable consequence of adopting the Environmental Justice Element. At most, the Environmental Justice Element contains policies that the City will use to evaluate the IBEC, just like any other development project proposed in the City.

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Nor has adoption of the Environmental Justice Element enabled the Proposed Project to evade CEQA review. The environmental review process for IBEC has been underway since early 2018 when the City issued its Notice of Preparation, almost a year before the City commenced community outreach for the Environmental Justice Element. In December 2019, the City issued a Draft EIR providing a comprehensive analysis of the IBEC proposal. The EIR included an analysis of the project through the lens of many of the same policy concerns that animate the Environmental Justice Element. (See, e.g., Draft EIR, pp. 3.12-15 – 3.12-17, Appendix S (ALH Urban and Regional Economics, *Inglewood Sports and Entertainment Venue Displacement Study* (July 2019)).) The City’s decision to consolidate those policy concerns in an Environmental Justice Element does not make the Proposed Project any more or less likely than before.

The opposite is also true. The Proposed Project is a significant proposal, but it does not purport to establish City-wide policy. Indeed, if approved, the Proposed Project will have no effect on City policy except with respect to those policies applicable to the Project site itself. The City’s decision whether to approve IBEC had no bearing on its decision to approve the Environmental Justice Element. As one Court summarized, the “key term” – “consequence” – is missing from the equation. (*Aptos Council, supra*, 10 Cal.App.4th at p. 282.)

Finally, as noted above, the second prong of the *Laurel Heights* test is whether “the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” (47 Cal.3d at p. 396.) In this instance, the Environmental Justice Element does not provide for, authorize, approve, or describe any particular development activity. It does not increase or change development densities or intensities. It does not authorize any particular land use. Although the Environmental Justice Element provides for evaluation by the City of its existing zoning regulations with a focus on promoting environmental justice policies, it does not include, result in, or authorize any development activity or other physical change to the environment, and does not mandate any specific changes to zoning regulations. For these reasons, the Environmental Justice Element is exempt from CEQA review under CEQA Guidelines sections 15060(c)(2) and 15061(b)(3) and falls within the Class 8 Categorical Exemption under CEQA Guidelines Section 15308, which applies to actions taken by regulatory agencies. Thus, even if there were some causal link between the Environmental Justice Element and the Proposed Project, there is no evidence that the Environmental Justice Element will “change the scope or nature of the [Proposed Project] or its environmental effects.” (*Laurel Heights, supra*, 47 Cal.3d at p. 396.)

Under these circumstances, case law confirms the common-sense conclusion that the City is not required to analyze the Environmental Justice Element as a component of the IBEC, nor is the City required to analyze the IBEC as a component of the

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Environmental Justice Element. (See, e.g., *Rodeo Citizens Assn. v. County of Contra Costa* (2018) 22 Cal.App.5th 214, 223-225 (“*Rodeo Citizens*”) [substantial evidence supported EIR’s consistent statements that improvements designed to recover propane and butane gas would not facilitate oil refinery’s ability to process heavier crude]; *Aptos Council, supra*, 10 Cal.App.5th at p. 282 [city not required to analyze as a single project separate proposals to modernize different chapters of its zoning ordinance]; *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1450 [county was not required to analyze, as part of the project, the possibility that some residences would seek to construct second units on each parcel] (“*Save Round Valley*”).)

Finally, the City notes the practical absurdity of the comment’s contention. Under the approach suggested by the comment, any contemporaneous proposal under review ought to be reviewed as a single project, in a single CEQA analysis. Under the comment’s approach, that principle would apply to planning efforts, public works, and private development projects proposed by different applicants, regardless of whether those various proposals depend upon one another, simply because they are proposed during the same general period. Such an approach would transform virtually every CEQA document into an unwieldy analysis of everything happening in the City at any given period of time, regardless of whether they are related to one another. The City believes that such an approach would paralyze the decision-making process and be unworkable.

Silverstein-42 The comment states that the City has engaged in piece-meal review of General Plan Land Use Element amendments. The comment also states that the amendment to the City’s Circulation Element is inconsistent with the correlation requirement in the State Planning and Zoning Law.

*Piece-mealing claim.* With respect to the general standards regarding such comments, please see the response to Silverstein-41. The City Council approved the amendments to the Land Use Element of the General Plan on June 30, 2020. The amendments do not alter land-use policy. The amendments apply throughout the City, to all proposals, and not solely to one specific proposal. The amendments therefore have independent utility and are not a necessary or essential component of any particular project. (*Banning Ranch, supra*, 211 Cal.App.4th at p. 1223.) The Proposed Project is located within the City and would therefore be subject to the amendments to the extent they are relevant to the Proposed Project, but to no greater or lesser extent than any other development proposal. The record contains no evidence that approving the Proposed Project will be a reasonably foreseeable consequence of adopting these amendments.

The EIR for IBEC concludes that with the proposed amendments that are included as part of the Proposed Project, the Proposed Project would be consistent with the Land Use Elements goals and objectives included in the General Plan. (Draft EIR, p. 3.10-34.) The General Plan Land Use Element amendments approved on June 30, 2020, were not necessary for approval of IBEC. Instead, the amendments are derived from existing

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standards and land use designations included in the General Plan. With respect to non-residential land uses, the General Plan and Municipal Code provide setback and landscape buffer requirements and include provisions that effectively define the maximum buildable area. The Land Use Element amendments use these existing standards and requirements to define a maximum building intensity for each non-residential land use designation. The amendments do not therefore allow for more intense development than is currently allowable.

Nor has adoption of the amendments enabled the Proposed Project to evade CEQA review. Environmental review for IBEC has been underway since early 2018 when the Notice of Preparation was issued. The IBEC EIR includes an extensive analysis of the extent to which the Proposed Project is consistent with applicable land-use policies. (IBEC Draft EIR, Chapter 3.10.) Under such circumstances, City staff concludes that the City does not need to analyze the proposed Land Use Element amendments as a component of the Proposed Project. Case law supports this conclusion. (See, e.g., *Rodeo Citizens*, *supra*, 22 Cal.App.5th at pp. 223-225; *Aptos Council*, *supra*, 10 Cal.App.5th at p. 282; *Save Round Valley*, *supra*, 157 Cal.App.4th at p. 1450.)

Finally, as noted above, the second prong of the *Laurel Heights* test is whether “the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” (47 Cal.3d at p. 396.) In this instance, the amendments to the General Plan Land Use Element do not provide for or describe any particular development activity, do not increase or change development densities or intensities from those already included elsewhere in the General Plan and Municipal Code, and do not authorize any particular land uses that are not already authorized under the current General Plan. Rather, the amendments incorporate into the Land Use Element population density and non-residential building intensity information derived from existing limitations and standards in the General Plan and the Municipal Code. For these reasons, the amendments would not result directly or indirectly in environmental impacts. They are therefore exempt from CEQA review pursuant to CEQA Guidelines §§15060(c)(2) and 15061(b)(3). The amendments also constitute “minor alterations in land use limitations” under CEQA Guidelines Section 15305 because they “do not result in any changes in land use or density,” but instead clarify uses and densities that are already embodied in existing General Plan policies. Moreover, there are no unusual circumstances that would render this categorical exemption inapplicable under CEQA Guidelines section 15300.2.

Under these circumstances, case law confirms the common-sense conclusion that the City is not required to analyze the General Plan Land Use Element amendments as a component of the IBEC, nor is the City required to analyze the IBEC as a component of the amendments. (See *Aptos Council*, *supra*, 10 Cal.App.5th at p. 282 [city not required

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to analyze as a single project separate proposals to modernize different chapters of its zoning ordinance].)

*Circulation Element Amendments.* The entitlements requested by the applicant include amending the General Plan Circulation Element. The amendments consist of updating maps and text to reflect the proposal to vacate portions of West 101st Street and West 102nd Street and to show the location of the Proposed Project. The City Council would also have to approve the vacation of these streets, and to adopt findings required in connection with such an approval.

These amendments are designed to ensure that the Circulation Element shows the City's road network in the event the City approves the Proposed Project.

The EIR explains why these actions are needed if the Proposed Project is to go forward:

The Arena Site also includes a portion of West 102nd Street that would be vacated as part of the Proposed Project. The portion of West 102nd Street that would be vacated is approximately 900 feet long, from South Prairie Avenue on the west to 3820 West 102nd Street to the east. This portion of West 102nd Street includes narrow sidewalks on both the north and south sides of the street, a few trees and minimal landscaping on the north side of the street, and overhead utility lines and poles on the south side of the street.

(IBEC Draft EIR, p. 2-15.)

The West Parking Garage Site also includes a portion of West 101st Street that would be vacated as part of the Proposed Project. The portion of West 101st Street that would be vacated is approximately 350 feet long, between the Airport Motel on the west and the Sunshine Coin Laundry building to the east. This portion of West 101st Street includes narrow, separated sidewalks on both the north and south sides of the street, two mature trees on the north side of the street and one mature tree on the south side of the street, streetlights on the south side of the street, and overhead utility lines and poles on the north side of the street.

Portions of the West Parking Garage Site are temporarily being used for construction staging by the City of Inglewood Public Works Department.

(IBEC Draft EIR, p. 2-16.)

The site plan shows why it is necessary to vacate these streets:

- West 102nd Street is an east/west road that bisects the Arena site. The footprint of the Arena is directly atop West 102nd Street between South Prairie and South Doty Avenues. If the Arena is constructed, this particular segment of West 102nd Street will cease to exist.

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- West 101st Street is an east/west road that bisects the West Parking Garage site. The footprint of the West Parking Garage is directly atop the eastern portion of the block of West 101st Street between South Flowers Street and South Prairie Avenue. If the West Parking Garage is constructed, this particular segment of West 101st Street will cease to exist.

The EIR addresses whether vacating these streets will result in physical environmental effects. (See IBEC Draft EIR, pp. 3.10-30 – 3.10-31.) The EIR concludes that this impact will not be significant.

The comment states that this is a “late disclosed” change. This statement is false. The abandonment of these streets was disclosed in the Draft EIR. The author did not submit comments on the Draft EIR on this or any other issue.

The comment states that the abandonment of these streets is inconsistent with the Circulation Element. The comment does not identify a particular goal or policy in the Circulation Element with which this proposal is purported to be inconsistent. Rather, the comment states that any proposal that involves vacating a street is necessarily inconsistent with the Circulation Element. No goals or policies in the Circulation Element support this view. In particular, the General Plan’s Circulation Element does not contain a goal or policy that prohibits the City from considering an application to vacate a public street. Moreover, a project need not be in perfect conformity with each and every General Plan policy. Rather, General Plans are aspirational documents, and it may be impossible to satisfy every policy therein, given the various issues that a General Plan must address. In light of these policies, a city’s determination regarding a project’s consistency with its General Plan is generally accorded significant deference. In this case, the City’s elected officials are best suited to determine whether a particular project is consistent with the City’s General Plan.

Silverstein-43 The comment states that an EIR must analyze whether a project is consistent with the General Plan. This comment is misleading. CEQA Guidelines section 15125, subdivision (d), states: “(d) The EIR shall discuss any *inconsistencies* between the proposed project and applicable general plans, specific plans and regional plans.” (Emphasis added; see *The Highway 68 Coalition v. County of Monterey* (2017) 14 Cal.App.5th 883, 894 [focus is in plans with which project is inconsistent; EIR need not discuss policies with which project is consistent].)

The IBEC EIR contains a discussion of the extent to which the project is inconsistent with applicable plans. This discussion appears throughout the document, in the context of the specific resource addressed by the plan at issue. (See, e.g., IBEC Draft EIR, Chapter 3.10, discussion of Impact 3.10-2 at pp. 3.10-32 – 3.10-35.)

The comment states that the Proposed Project is inconsistent with “Environmental Justice Principles,” citing comments by the Natural Resources Defense Council. The



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City disagrees. Please see IBEC Final EIR, Chapter 3, Responses to Comments, Response NRDC-4.

The comment also references comments by the State Legislature. The State Legislature did not submit comments on the IBEC Draft EIR. The reference is therefore unclear.

The comment intimates that the Environmental Justice Element is mandatory. This statement is misleading. In 2016, the State of California passed Senate Bill 1000 (SB 1000) which established California Government Code section 65040.12(e) directing cities and counties to address environmental justice in their general plans. Cities and counties may choose to adopt a separate standalone Environmental Justice Element or address environmental policies throughout the General Plan. The City approved a standalone Environmental Justice Element on June 30, 2020. City staff has analyzed the extent to which the Proposed Project is consistent with the policies set forth in this element and has concluded that the project is consistent. This analysis is reflected in draft findings that staff is presenting to the City Council for its consideration.

Silverstein-44 The comment states that the City violated the Brown Act in approving agreements to settle four lawsuits. This statement is incorrect. Please see Response to Comment Silverstein-2.

The comment states that the agreement approved by the City on March 24, 2020, constitutes significant new information. This statement is incorrect. In approving the agreement on March 24, the City did not take any action on the Proposed Project or constrain the City's authority to approve a mitigation measure or alternative, including the "no project" alternative. Please see Response to Comment Silverstein-18 for a discussion of the California Supreme Court's decision in *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, and its applicability to the March 24 agreement.

The comment incorporates by reference claims advanced by other parties concerning the City's approval of the ENA. The comment does not explain why or how these claims are relevant to the March 24 agreement. The comment therefore does not provide the City with sufficient information to be able to respond. (PRC §21177; *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2020) 47 Cal.App.5th 588, 618-619; *Mani Brothers Real Estate v. City of Los Angeles* (2007) 153 Cal.App.4th 1385, 1394.)

With respect to the litigation concerning the ENA, the plaintiffs and petitioners in those cases have filed dismissals. None of those claims is pending. With respect to the claim that the City violated CEQA by approving the ENA, a trial court entered judgment denying that petition. (*Inglewood Residents Against Takings and Evictions v. City of Inglewood* (Los Angeles Superior Court, Case No. BS170333), Hearing on Petition for Writ of Mandate, Ruling on Submitted Matter (December 27, 2018).) The plaintiff in that case filed a notice of appeal of the trial court's decision to deny the petition. On

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May 4, 2020, the plaintiff filed a request for dismissal with the Court of Appeal. That same day, the Court of Appeal filed a dismissal order. The case is now completed. (*Inglewood Residents Against Takings and Evictions v. City of Inglewood* (Second Dist. Court of Appeal, Case No. B296760).) Please see Response to Comment Silverstein-6.

Silverstein-45 The comment makes reference to PRC §15186(a). The correct reference to §15186(a) should be to the CEQA Guidelines, which is Title 14, Division 6, Chapter 3, Sections 15000 – 15387 of the California Code of Regulations, and not the Public Resources Code, which includes CEQA as Sections 21000 - 21189. Assuming that the reference is to the CEQA Guidelines, its applicability to the Proposed Project is incorrect. Guideline §15186(b) defines projects to which this section is applicable as

“a project located within one-fourth mile of a school that involves the construction or alteration of a facility that might reasonably be anticipated to emit hazardous emissions, or that would handle an extremely hazardous substance or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified in subdivision (j) of Section 25532 of the Health and Safety code, that may impose a health and safety hazard to persons who would attend or would be employed at the school,…”

The Proposed Project meets none of these standards. The Draft EIR Section 3.2, Air Quality, clearly recognizes the presence of nearby schools and education uses. Figure 3.2-2, Draft EIR page 3.2-21, identifies the Dolores Huerta Elementary School, the Morningside High School, and the early childhood education facility, as “Air-Sensitive Receptors.” As is described in Figure 3.2-4, Draft EIR page 3.2-99), the closest school to the Project Site, the Lennox School District’s Delores Huerta Elementary School, is located outside the 1 in a million cancer isopleth for the combined construction and operational health risk assessment conducted in the EIR. Thus, the Proposed Project would not emit hazardous emissions.

The Draft EIR includes clear and unambiguous consideration of the potential impacts of the Proposed Project on schools in the vicinity of the Project Site, irrespective of whether they are located in the Inglewood Unified School District, or other neighboring districts. In footnote 38, the commenter has misleadingly cited a figure (Draft EIR Figure 3.13-3) which identifies the schools within the Inglewood Unified School District. The purpose of Draft EIR Figure 3.13-3, situated in the Public Services section of the Draft EIR, is to support the analysis of the impact of the Proposed Project on public schools. As is explained on Draft EIR page 3.13-62, because the Project Site is located within the IUSD, project employees could request an inter-district attendance permit to an IUSD school for parent employment reasons; thus, information about IUSD schools was relevant for inclusion in that section of the Draft EIR. However, as discussed below, for other impact analyses, information on potentially affected schools is presented irrespective of the particular district with which the school is affiliated, if any.

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As discussed above, the Draft EIR Air Quality analysis clearly identifies the presence of the Dolores Huerta Elementary School, the Morningside High School, and the early childhood education use in Figures 3.2-2 and 3.2-4. Further, on Draft EIR page 3.8-19, the relationship of the Project Site to nearby schools is clearly presented, including specific information about proximity to the Dolores Huerta Elementary School in Lennox (620 feet, or 0.12 miles, from the Project Site), the Morningside High School in Inglewood (985 feet, or 0.19 miles, from the Project Site), as well as the referenced early childhood education use that is located immediately south of the Project Site on West 104<sup>th</sup> Street.

Draft EIR Impact 3.8-3, Draft EIR page 3.8-37 to -39, describes the hazardous emissions and hazardous materials that would be used, stored and/or handled within 0.25 miles of an existing or proposed school, and Impact 3.8-9, Draft EIR pages 3.8-52 to -53 describes the same issues in the cumulative context. During construction, it is noted that “the Proposed Project would require use of limited quantities of hazardous materials, including fuels, oils and lubricants for construction equipment; paints and thinners; and solvents and cleaners.” None of the hazardous materials used during construction would fall into the category of extremely hazardous substances. In the case of both Impact 3.8-3 and Impact 3.8-9, the Dolores Huerta Elementary School and other schools or educational uses within 0.25 miles of the Project Site would be exposed to on negligible, less than significant, risks “[b]ecause a comprehensive and enforceable set of federal, State, and local laws and regulations govern the transport, storage, use and disposal of hazardous materials and wastes to reduce the potential for accidental release and exposure of people and the environment, and because the type and quantity of hazardous materials used at the Proposed Project and other cumulative projects would be small and typical of current development and business operations...” The Draft EIR also describes that during operations “the Proposed Project would involve the use of relatively small quantities of common hazardous materials including paints and thinners, cleaning solvents, fuels, oils, low risk medical wastes, and lubricants. The operation of the Proposed Project would not involve the types of hazardous emissions that are typical of industrial land uses and which require source regulation and permitting.”

For the reasons explained above, the Proposed Project would not result in hazardous emissions or involve the handling of extremely hazardous substances. As such, CEQA Guideline §15186 does not apply to the Proposed Project and was not required to be complied with in the development of the EIR.

Contrary to the assertion in the comment, the analysis of human health hazards in the Draft EIR is extensive, detailed, with fully articulated explanations of both the methodology and the results. Not only did Draft EIR Section 3.2, Air Quality, include a regional Health Impact Assessment to determine potential health consequences of regional pollutants such as ozone and small particulate matter, but it also included a

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detailed Health Risk Assessment (HRA), consistent with the OEHHA guidelines examining the cancer risks associated with local exposures to project related pollutants over a 30+ year construction and operational period. The methodology for the HRA is presented in Draft EIR, Section 3.2, Air Quality, pages 3.2-54 through 3.2-61, including Tables 3.2-11, 12 and 13. The results of the HRA are discussed under Impact 3.2-3, on Draft EIR pages 3.2-97 through 3.2-102, including Tables 3.2-31 through 3.2-36, and Figure 3.2-4.

Because cancer risk is based on long-term (i.e., lifetime) exposures, the EIR analyses assumed exposures over an extended period that varies depending on the type of use. For residential receptors, the period is conservatively defined as 30.25 years (from third trimester in utero, forward), 24 hours per day, 365 days per year. For intermittent land uses, such as schools, day care centers, or work, total exposure is defined for shorter periods of time, such as 8 hours per day, approximately 188 days per year, and for a shorter period (e.g., 7 years for a school). Detailed explanation of the cancer risk exposure parameters used in the Health Risk Assessment is provided in Draft EIR Table 3.2-11, page 3.2-58.

The results of this land use specific modeling is that at the same general location, a use like the Early Childhood Education Facility or a school pose less risk than the adjacent residential uses. This differential modeling is reflected in Figure 3.2-4, reproduced in the comment, which depicts the combined construction and operational incremental increase in cancer risk at a dense grid of receptor locations around the Project Site, including the Dolores Huerta Elementary School and at the Early Childhood Education Facility where it is indicated that the increased risk at each location would be less than one in a million.

As described above and presented in the Draft EIR, the analyses of human health hazards in the EIR is painstakingly detailed, substantive, consistent with guidance of both OEHHA and the SCAQMD, and anything but cursory. Please also see Final EIR, Chapter 3, Response to Comment NRDC-11 for further discussion of the consideration of human health impacts in the Draft EIR.

Silverstein-46 Section 3.14 of the Draft EIR presents all relevant impacts of the Proposed Project on traffic, transportation and circulation during construction and operation of the Proposed Project. The Dolores Huerta Elementary School is situated on 104<sup>th</sup> Street (a two-lane collector street) west of Prairie Avenue. The school can be accessed by the signalized intersection at Prairie Avenue/104<sup>th</sup> Street and the all-way stop-controlled 104<sup>th</sup> Street/Freeman Avenue intersection. Since the school is situated directly on 104<sup>th</sup> Street, changes in traffic volumes on this street are a good measure of how school impacts may be judged. The section of 105<sup>th</sup> Street that runs from South Prairie Avenue to South Freeman Avenue does not carry substantial traffic and the intersections are not signalized, thus not warranting analysis.

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The traffic analysis considers impacts of the Proposed Project traffic at the intersections of 104<sup>th</sup> Street and South Prairie Avenue, as well as at Hawthorne Boulevard, the two key signalized intersections serving the Dolores Huerta Elementary School. In addition, the segment of 104<sup>th</sup> Street from South Prairie Avenue to South Freeman Avenue was evaluated in the Neighborhood Street impact analysis. Table 3.14-16 of the Draft EIR shows that the ancillary land uses would cause the weekday daily volume on this segment of 104<sup>th</sup> Street to increase from 3,900 vehicles (Adjusted Baseline No Project) to 4,500 vehicles (Adjusted Baseline Plus Ancillary Land uses). Similarly, Table 3.14-32 of the Draft EIR shows that a Major Event at the Proposed Project would cause the weekday daily volume on this segment to increase from 3,900 vehicles (Adjusted Baseline No Project) to 4,500 vehicles (Adjusted Baseline Plus Major Event). These increases are not considered to be significant because the resulting volume would remain well below the capacity of a two-lane collector street and the impact criterion established on page 3.14-63 in the Draft EIR for residential collector street segments. Moreover, elementary schools are known to have peak school-related travel periods (i.e., from 8 to 9 AM, and from 2 to 3 PM) that typically do not overlap with most peak travel at the Proposed Project.

The Project would not alter access to the school directly from 104<sup>th</sup> Street, nor from either Prairie Avenue or Freeman Avenue. Multiple project scenarios (e.g., Ancillary Land Uses, Daytime Events, and Major Events) are found to cause significant impacts at the Prairie Avenue/104<sup>th</sup> Street intersection. Mitigation Measure 3.14-3(I) includes operational improvements to increase the capacity of the intersection and to better accommodate left-turns from Prairie Avenue onto westbound 104<sup>th</sup> Street.

Please see Response to Comment Silverstein-45 for a discussion of the consideration of health and safety impacts, including air pollution effects, on schools in the vicinity of the Project Site.

Silverstein-47 Section 3.8 of the Draft EIR, Hazardous Materials and Hazards, was based on two technical memoranda prepared by EKI which was supported by an independent database review of the project site and surrounding area. Specifically, the EKI reports included reviewing database records for all the project parcels and database records of up to one mile from the project site. A soil and soil gas sampling program was implemented based on the database records to evaluate surface soils for the potential presence of contaminants of concern indicated by the database records and site reconnaissance of current land uses.

The potential hazards of asbestos are discussed in the Draft EIR on page 3.8-4 and specifically addresses the potential health hazards associated with demolition of structures that could include asbestos containing materials (ACMs). Page 3.8-7 mentions the 3901 West 102nd Street location as a site that is associated with disposal of 33 tons of asbestos. Page 3.8-33 of the Draft EIR discusses the regulatory requirements for the

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identification, removal, and disposal of ACMs which is regulated under 8 CCR 1529 and 5208. Therefore, any demolition activities that would be associated with the proposed project would be required to evaluate the structure for the potential presence of asbestos by a state certified contractor, and any ACMs discovered must be removed and disposed of in a manner that is protective of human health for the workers and the public consistent with 8 CCR 1529 and 5208, OSHA requirements, and the South Coast Air Management District. Adherence to these regulatory requirements would also be protective of any sensitive receptors in the vicinity of the project site including schools.

Otherwise, the Draft EIR recognizes the potential for contaminants of concern to be present at the site. Page 3.8-43 of the Draft EIR states that “based on available information about past uses and existing levels of contaminants in soil samples analyzed from each part of the Project Site, the potential exists to create a significant hazard to the public or the environment as a result of exposure to existing contamination.” As a result, Mitigation Measure 3.8-4 is required for all project construction activities, to ensure that a Soil Management Plan is prepared and implemented to protect workers, the public, and the environment from any contaminants that may be present in the subsurface.

Implementation of Mitigation Measure 3.8-4 would ensure that construction activities can be conducted to identify, isolate, and confirm the potential presence of suspect soils. Therefore, considering the investigative work that has already been completed for the site combined with mitigation that provides the means to address known and potentially discoverable contamination during construction, there is justification for a determination of less than significant impacts with mitigation and no need for any further investigation.

As described above, all the issues associated with hazards that are addressed in this comment were fully considered in the Draft EIR. As such, none of the criteria for recirculation established in CEQA Guidelines §15088.5 are triggered, and there is no need for recirculation of the Draft EIR.

Silverstein-48 Contrary to the assertion of the commenter, the Mitigation Monitoring and Reporting Program (MMRP) that was included in the Final EIR, and which has been subsequently refined for presentation to the City Council, meets all of the requirements established in CEQA and reflected in CEQA Guideline §15097(e). Contrary to the assertion that the MMRP “focuses mainly on temporary construction impacts,” the MMRP includes 69 distinct mitigation measures, including 165 specific sub-measures, addressing construction and operational phases of the Proposed Project, measures addressing an extensive set of operational scenarios (including conduct of concurrent events at the Proposed Project, The Forum, and/or Sofi Stadium), under both Adjusted Baseline and Cumulative conditions. In addition to all of the mitigation measures identified in the EIR, the MMRP includes construction and operational Project Design Features, elements of the Proposed Project that have been designed into the project for the express

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purposes of avoiding or substantially lessening environmental effects, as well as Conditions of Approval that are required pursuant to the Proposed Project's certification under AB 987 (PRC §21168.6.8). Again, contrary to the assertion in the comment, the mitigation measures included in the MMRP include actions that are to be taken to reduce significant impacts to less than significant in some cases, and in other cases to reduce the magnitude of those impacts to the maximum extent feasible.

Mitigation Measure 3.14-2(h) was added in the Final EIR based on consultation between the City and Caltrans. It provides that "[t]he 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." The MMRP clearly denotes that the project applicant is responsible for implementation of the measure, in consultation with Caltrans, and the City's Department of Public Works, Transportation & Traffic Division is responsible to monitor the implementation of the measure and confirm that the payment has been made. The payment to Caltrans is required to be made prior to the City's issuance of the first building permit for Arena construction (following the excavation phase), giving Caltrans more than 2 years to complete the improvements prior to the first major event at the Proposed Project arena. Thus, the MMRP provides substantive detail on the amount, use of, responsible parties, and timing of this measure, and is not "silent on this arrangement" as asserted in the comment.

The comment misleadingly conflates the contributions to Caltrans' I-405 ATM/CM program provided for in Mitigation Measure 3.14-24(h) with the provisions of Mitigation Measure 3.14-2(j) (obliquely cited as MMRP p. 53), which address mitigation improvements at the I-105 westbound off-ramp at Crenshaw Boulevard. The measure itself calls for the widening of the westbound off-ramp. Preliminary review by the City suggests that this measure would be feasible. However, because the measure falls entirely within Caltrans right-of-way, it would be required to be processed by Caltrans through its project development process, which includes a variety of steps including, potentially a cooperative agreement between the agencies, a permit engineering evaluation report, project study report, project report, environmental and engineering studies, project design and construction. It is typical that these steps in the Caltrans process take a number of years.

Rather than simply determining that the mitigation is infeasible, the MMRP directs that prior to the Certificate of Occupancy, the project applicant is required to work with the cities of Inglewood and Hawthorne, along with Caltrans to determine the feasibility of the improvements. If it is determined to be feasible, the improvements either need to be completed, or the project applicant needs to provide "adequate security" for the estimated cost of the improvements, thereby assuring the financial ability to implement the measure. Because the City cannot guarantee that the measure is feasible and can be

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implemented prior to the opening of the Proposed Project arena (the triggering impact is a Major Event at the arena) because the measure is within the authority of another agency (Caltrans) and is required to go through a design and permitting process overseen and implemented by the other agency, it has determined and would make findings that the impact is considered Significant and Unavoidable. This finding is consistent with the provisions of CEQA Guideline §15091(a)(2) and is neither improper deferral of mitigation nor a “gross subversion” of CEQA, as asserted in the comment.

Silverstein-49 The comment claims that the Statement of Overriding Considerations is unsupported. The City disagrees.

First, the comment states that the Statement of Overriding Considerations renders the Proposed Project inconsistent with various elements of the City’s General Plan. The comment does not identify any specific inconsistencies. For this reason, no response can be provided.

Second, the comment claims that the statement of overriding considerations must address the overriding benefits that outweigh each of the project’s significant and unavoidable impacts. The statute does not require such an impact-by-impact statement of overriding considerations. Rather, the statute requires that the lead agency adopt a finding concerning those impacts where “[s]pecific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.” (Pub. Resources Code, § 21081, subd. (a)(3).) For those impacts that are identified as “significant and unavoidable,” the lead agency must adopt a finding that “specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.” (Pub. Resources Code, § 21081, subd. (b).) The statement of overriding considerations prepared by City staff, and recommended for approval by the City Planning Commission, includes this information. Among other things, the statement (a) lists the impacts identified as “significant and unavoidable,” and (b) describes the overriding benefits of the project that outweigh those impacts. The statement therefore complies with both the letter and spirit of the statute.

The comment states that the benefits cited in the statement are not supported by substantial evidence. This statement is incorrect. The statement cites the evidence upon which it relies. Please see Draft Development Agreement, Exhibits C, H-1, H-2 and H-3 (community and air quality benefits); HR&A, *Economic and Fiscal Impact Report: Inglewood Basketball and Entertainment Center*, May 2020; *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



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10, 2020). The City believes that these reports, as well as other information in the record, constitute substantial evidence of the Proposed Project's benefits.

The comment states that the City does not have sufficient evidence of the infeasibility of alternatives that consists of a smaller project, or that would involve developing the Project site with less intensive uses. This statement is incorrect. The City's findings cite a detailed memorandum addressing the feasibility of alternatives, including alternatives that involve a smaller project, or alternative uses of the site. (See Memorandum from Brian D. Boxer, AICP, ESA, to Christopher Jackson, Fred Jackson, and Royce Jones, City of Inglewood (June 12, 2020).) The EIR contains additional information on alternatives considered for analysis but rejected as inconsistent with basic project objectives or infeasible. (See IBEC Draft EIR, Chapter 6.3; see also IBEC Final EIR, Responses to Comments NRDC-4 and Channel-40 through Channel-47.

Silverstein-50 The comment states that proposed amendments to the Inglewood International Business Park Specific Plan (IIBP Specific Plan) are unlawful. This statement is incorrect.

The City approved the IIBP Specific Plan in 1993. The purpose of the IIBP Specific Plan was to encourage the redevelopment of the site as a campus-like business park. The IIBP Specific Plan encompasses portions of the Proposed Project site. As set forth in an analysis of alternative uses of the site:

These parcels have remained vacant and underutilized despite the City's efforts to encourage investment and redevelopment. 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. None of the City's economic development goals, as expressed in the City's adopted plans and policies, will be achieved.

(Memorandum from Brian D. Boxer, AICP, ESA, to Christopher Jackson, Fred Jackson, and Royce Jones, City of Inglewood (June 12, 2020), p. 5.)

As this memorandum notes, portions of the Proposed Project site are located within the IIBP Specific Plan area. The uses authorized under the IIBP Specific Plan focus on the development of the area as a business park. The Proposed Project is not consistent with those uses. For this reason, if the City approves the Proposed Project, the City would amend the IIBP Specific Plan so that the policies it contains do not apply to those

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Proposed Project parcels that are located within the IIBP Specific Plan area if developed with the Proposed Project. If the amendments are approved, then the policies set forth in the IIBP Specific Plan will no longer apply to the parcels within the IIBP Specific Plan area that are included in the Proposed Project site if developed with the Proposed Project. The IIBP Specific Plan will continue to apply, however, to all other parcels located within the specific plan area not developed with the Proposed Project.

The comment states that the amendment of a specific plan necessarily constitutes a variance, such that variance findings are required. The comment is incorrect. Amending a specific plan is a legislative act. The local legislature that adopted a specific plan in the first instance has discretion to amend it. Doing so does not constitute a variance or spot zoning. Rather, doing so reflects a change in the exercise of local, legislative decision-making. If a specific plan is amended so that it does not apply to particular parcels, then none of the specific plan policies applies to the parcels that are no longer subject to the plan. If those policies do not apply to the parcels at issue, then no variance is needed, and variance findings need not be adopted.

Silverstein-51 [no bracketed comment]

Silverstein-52 The comment states that the EIR does not contain sufficient information regarding the Proposed Project's consistency with the General Plan or IIBP Specific Plan. This statement is incorrect. With respect to General Plan consistency, please see Response to Comment Silverstein-43. With respect to IIBP Specific Plan consistency, if the Proposed Project is approved, then the IIBP Specific Plan will be amended such that its policies do not apply to any portions of the Project Site within the IIBP Specific Plan area if developed with the Proposed Project. Because the IIBP Specific Plan and the policies set forth therein will no longer apply, no inconsistency will exist. (See *Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 543.) The street widening and open space contemplated by the IIBP Specific Plan will not occur on the Project Site. The Proposed Project incorporates, however, a publicly accessible plaza that will provide significant open space in the area. (See IBEC Draft EIR, pp. 3.13-43 – 3.13-44 [description of plaza], 2-22, 2-40 – 2-41 [description and views of plaza area].)

Silverstein-53 The comment states that there is insufficient evidence to support the findings necessary to grant a variance. The applicant has not requested a variance. Please see Response to Comment Silverstein-50.

Silverstein-54 The comment states that amending the Specific Plan boundary constitutes impermissible "spot zoning." The term "spot zoning" is inherently imprecise. The courts have not identified a specific test for determining when spot zoning has occurred, or when the approval of spot zoning is impermissible. As a general matter, however, the phrase refers to the practice of zoning a discrete parcel of land in a manner that restricts uses in a manner that does not apply to similarly situated surrounding parcels, where there is no rational basis for distinguishing between the parcel and its surroundings. (See, e.g., *Ross v.*

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*City of Yorba Linda* (1991) 1 Cal.App.4th 954.) Impermissible spot zoning may also occur where the agency singles out a particular parcel for greater uses than those of its surroundings. (*Foothill Communities Coalition v. County of Orange* (2014) 222 Cal.App.4th 1302, 1311-1314.) A claim that impermissible spot zoning has occurred must generally show that the agency's decision was based on retaliation or some other nefarious purpose unrelated to the actual regulation of land use. (See, e.g., *City and County of San Francisco v. Bullock* (1996) 50 Cal.App.4th 1886 [no evidence that exercise of zoning power was motivated by improper purposes].) The Courts recognize that the exercise of the zoning power invariably involves drawing lines and making distinctions between parcels. This exercise is impermissible, however, only when the line-drawing exercise becomes completely arbitrary or based entirely on improper motives.

In this case, portions of the Project Site are located within the IIBP Specific Plan area. If approved, the City will amend the IIBP Specific Plan to exclude those portions of the Project Site from the IIBP Specific Plan such that its policies do not apply to the Project Site if developed with the Proposed Project. Given the history of the site, however, the claim that this exercise of the zoning power constitutes impermissible "spot zoning" is unintelligible. The IIBP Specific Plan has been in place since 1993. Despite the City's longstanding encouragement of redevelopment of the area, that has not occurred. The areas within the IIBP Specific Plan area not developed with the Proposed Project will still be subject to these policies should development interest emerge for a business park, and such development could still be implemented. The Project Site is not being singled out, however, for an impermissible reason. The City's former vision for the area, as a business park, has not come to fruition. A new vision – the Proposed Project – is being proposed. The City's interest in facilitating that alternative vision is not evidence of spot zoning. Rather, it is evidence of the City's desire to put the property to productive use, rather than having the area continue to languish in its largely vacant state.

The comment states that the Proposed Project will benefit visitors from other communities, rather than City residents and businesses. The comment is not substantiated. In any event, the City Planning Commission disagreed with this view. City staff notes that there is abundant evidence supporting the conclusion that the Proposed Project, if approved, would benefit City residents and businesses. This evidence is set forth in the Statement of Overriding Considerations, and in comments and testimony that has been submitted. The comments and testimony provided by local residences and businesses has not been uniformly supportive, but the vast majority of those providing comments and testimony have encouraged the City to approve the Proposed Project.

Silverstein-55 The comment states that the City has not cited a substantial public need justifying the benefits conferred on the Proposed Project, particularly in light of the narrow sidewalks in the area, and amendments to the IIBP Specific Plan so that those of the Proposed

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Project's parcels that are within the IIBP Specific Plan boundary would not be subject to the IIBP Specific Plan.

The comment appears to be based, not on the existing, physical characteristics of the site, but on policies set forth in the IIBP Specific Plan that would be implemented if and when the IIBP Specific Plan area is developed as a business park.

To the extent the sidewalks are narrow, that is an existing condition, not an impact of the Proposed Project. The City has analyzed impacts associated with pedestrians traveling to and from the Project Site, based on those existing conditions, and the pedestrian improvements proposed as part of the Proposed Project. (See IBEC Draft EIR, Chapter 3.14 – see, e.g., Figure 3.14-5 [Existing Pedestrian Facilities], pp. 3.14-132 – 3.14-136 [evaluation of pedestrian access], 3.14-248 – 3.14-249 [impact evaluation and mitigation to provide pedestrian access].) Please see Responses to Comments Silverstein-35 and Silverstein-38 addressing sidewalk widths and pedestrian access,

The IIBP Specific Plan includes policies that would require larger setbacks if the area developed as a business park. If the Proposed Project is approved, then those policies will not apply to the Proposed Project.

The Proposed Project site has been largely vacant for decades. Proposals to develop the site as a business park have not proven to be viable. Thus, the existing setting does not consist of a business park with large setbacks. Rather, the existing setting consists of a largely vacant site with sidewalks that vary from five to eight feet in width. The Proposed Project includes a pedestrian bridge across South Prairie Avenue, a large plaza, and other sidewalk and wayfinding improvements designed to accommodate pedestrians. A project variant provides that, if the project applicant is able to obtain easements from property owners on the north side of West Century Boulevard, a second pedestrian bridge will span that roadway as well. The IBEC EIR analyzes these improvements and concludes that, as mitigated, the site will provide adequate access to pedestrians.

The comment refers to the Project Site as an “island.” This description is inaccurate. Under existing conditions, the Project Site and surrounding parcels are generally designated and zoned for commercial and industrial uses. (IBEC Draft EIR, Figures 2-5 and 2-6.) If the Proposed Project is approved, then the General Plan designation of the Commercial properties would be changed to Industrial so the entire site would have an Industrial designation. For certain parcels, vestigial residential zoning designations (which do not conform to the corresponding General Plan designation for those parcels) would be rezoned. One use that would be an “island” if it were approved in this location would be residential, in light of the incompatibility of such uses with the proximity to LAX and the Federal Aviation Administration (FAA) grant program that was used to acquire much of the site. (See Response to Comment Silverstein-59.) The Proposed Project, however, does not include residential uses. Thus, the comment that the Proposed Project would result in an island with discordant land-use designations and

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zoning is false. The record does not support the claim that the City is arbitrarily conferring preferential General Plan or zoning designations on the Project Site.

The comment states that the changes to land-use policy are being made solely to serve private needs. It is unclear why the consideration of private needs is an improper consideration when a local agency exercises its legislative authority over land-use. In any event, such an exercise becomes improper only where it is retaliatory or based on some other improper purpose that does not relate to the use of land. There is no evidence of such improper use here.

In addition, the Proposed Project, if approved, will confer significant benefits on City residents and businesses. These benefits are described in the Statement of Overriding Considerations endorsed by the City Planning Commission. Please see Responses to Comments Silverstein-49 and Silverstein-54.

Silverstein-56 The comment states that the City should not approve the Proposed Project's proposed subdivision map because (1) the Proposed Project is not consistent with the City's General Plan, as required by Government Code section 66473.5, and (2) the City must deny the map based on the criteria set forth in Government Code section 66474.

The entitlements currently requested by the applicant do not include a subdivision map. For this reason, the comment is not relevant to the entitlements requested by the applicant.

The entitlements contemplate that the applicant may apply for a subdivision map or lot line adjustment in the future. At that time, the City will apply the standards set forth in the Subdivision Map Act with respect to consideration of the proposed map.

The City has performed a detailed analysis of the extent to which the Proposed Project is consistent with the City's General Plan. That analysis, referred to as the "General Plan Consistency Analysis," is attached to the City Council's staff report. The analysis concludes that, if the City Council approves the requested entitlements, the Proposed Project will be consistent with the City's General Plan. Staff notes that this same analysis would be relevant to the City's consideration of a proposed subdivision map or lot-line adjustment.

With respect to the criteria set forth in section 66474, the comment does not explain the basis for its position, other than citing the significant and unavoidable impacts disclosed in the EIR. The contention appears to be that, if a project will have significant and unavoidable impacts, then an agency cannot approve a tentative subdivision map or lot-line adjustment. There is no case law supporting this position. Instead, CEQA provides that an agency can approve a project despite its significant and unavoidable impacts, if the agency finds that the project's benefits warrant overriding those impacts. (Pub. Resources Code, § 21081, subd. (b).)

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In a footnote, the comment cites a recent, published decision issued by the Fourth District Court of Appeal: *Golden Door Properties v. County of San Diego* (2020) – Cal.App.5th – [2020 WL 3119041]. The footnote is unrelated to the comment pertaining to the Subdivision Map Act. Instead, the *Golden Door* decision focuses on the criteria that emission reduction credits, or “offsets,” must meet to serve as CEQA mitigation for a project’s greenhouse gas emissions. For additional information on the *Golden Door* decision, please see Response to Letter 18 (NRDC).

Silverstein-57 The comment states that the Proposed Project is not suitable for the site. The opinion expressed in the comment is noted. Staff observes that the majority of those providing comments or testimony to the City have expressed strong support for the Proposed Project. This support is not unanimous, as evidenced by the comment. Nevertheless, it is accurate to note that those residents and businesses that support the Proposed Project vastly outnumber those who are opposed.

The comment states that the ordinance violates the Subdivision Map Act by allowing ministerial lot line adjustments. Lot line adjustments, if any, would be subject to both the Subdivision Map Act and the City’s subdivision code. Under certain circumstances, lot line adjustments may be ministerial. (See Gov. Code, § 66412; *Sierra Club v. Napa County Board of Supervisors* (2012) 205 Cal.App.4th 162, 179-180.) The Lot Line Authorization provision in Section 6 of the proposed Zoning Code Amendment ordinance states that lot lines may be adjusted in accordance with the provision of Government Code §66412(d), which exempts lot line adjustments between four or fewer parcels from the Subdivision Map Act. There is no basis for the commenter’s assertion that lot lines are being or would be proposed for five or more parcels in contravention of the Subdivision Map Act.

The comment notes that certain parcels are owned by the City’s Successor Agency. The comment is noted. The City will comply with procedural requirements associated with the disposition of these parcels.

Silverstein-58 The comment states that new information exists that the proposed Disposition and Development Agreement violates the Surplus Land Act, citing the inclusion of a proposed hotel in the Proposed Project.

The evidence cited in support of this claim consists of an appellate brief filed in a lawsuit alleging that, in entering into an Exclusive Negotiating Agreement (“ENA”) with the Proposed Project Applicant, the City pre-committed to the Proposed Project, in violation of CEQA. The appellate brief argued that the ENA precluded the City from considering affordable housing as an alternative use of the site, as required by the Surplus Land Act (Gov. Code, § 54220 et seq.). As noted above, the trial court denied the petition, ruling that the City had not pre-committed to the Proposed Project. (*Inglewood Residents Against Takings and Evictions v. City of Inglewood*, Case No. BS170333 (Los Angeles County

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**DETAILED RESPONSES TO COMMENT LETTER 22**

Superior Court.) The plaintiff appealed this ruling but subsequently dismissed its appeal. For this reason, the trial court's judgment is now final.

Another lawsuit raised directly the applicability of the Surplus Land Act to the Proposed Project site. (*Uplift Inglewood Coalition v. City of Inglewood*, Case No. BS172771 (Los Angeles County Superior Court).) In that case, the trial court ruled that the portions of the Project Site that are owned by the City or the Successor Agency are not surplus lands within the meaning of the Surplus Land Act. For this reason, among others, the City was not required to make the land available for the development of the parcels as affordable housing, parks or open space. The trial court's ruling also provides a detailed history of the site, including the FAA's grant funding program, and the City's efforts to redevelop the area for uses that are compatible with the noise contours created by proximity to LAX runways.<sup>6</sup>

Regarding the commenter's assertion that the Project includes a residential structure, see Response to Comment Silverstein-14. The proposed hotel does not alter the analysis set forth in the trial court's judgment. There, the trial court ruled that the Project Site was not surplus, and therefore not subject to the Surplus Land Act, because the City held the land for purposes of economic development with uses compatible with the Project Site's proximity to LAX and with the FAA's grant program. The development of a portion of the site for a hotel is consistent with those purposes.

Silverstein-59 The comment states that the disposition and development agreement is based on fraud and is therefore invalid.

The comment contains no evidence that such fraud occurred. The exhibit cited in support of this claim consists of a newspaper article published in September 2018. The article discusses a Superior Court ruling in a lawsuit filed by MSG Inc., the former owner of The Forum. The article describes allegations made by MSG in that lawsuit. Such allegations by an entity suing the City are not evidence that such events occurred; rather, they are simply allegations by one party against another. These allegations have not proceeded to trial. MSG has dismissed its lawsuit.

The comment states that the site formerly contained residences that the City acquired and then demolished. This statement is correct. The EIR describes the site's history. As the EIR explains, most of the Project site (approximately 23 acres) has been and remains vacant and 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 objective of this program was to acquire sites with incompatible land uses due to the

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<sup>6</sup> *Uplift Inglewood Coalition v. City of Inglewood*, Case No. BS172771 (Los Angeles County Superior Court), Judgment Entered November 14, 2019.

**EXHIBIT A  
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noise levels of airport operations. Under that program, the FAA and the City of Inglewood approved the acquisition of several parcels on the Project Site. The residences were acquired because they are incompatible uses. (See IBEC Draft EIR, pp 3.10-4 – 3.10-5; see also Memorandum from Brian D. Boxer, AICP, ESA, to Christopher Jackson, Fred Jackson, and Royce Jones, City of Inglewood (June 12, 2020), pp. 3-4 [history of FAA grant program]; *Uplift Inglewood Coalition v. City of Inglewood*, Case No. BS172771 (Los Angeles County Superior Court), Judgment Entered November 14, 2019 [describing history of site, including acquisition of residential uses under FAA’s grant program].)

Since that time, the City has engaged in efforts to redevelop the area with uses that are compatible with its proximity to LAX. These efforts include the approval of the Inglewood International Business Park Specific Plan in 1993. The plan calls for redevelopment of a portion of the area as a campus-like business park. Since the mid-1980s and up until the current IBEC Project proposal, the City has sought to attract a variety of uses to the Project Site but has not been able to generate momentum or build interest in the site from private sector developers.

The comment states that the City cleared the site of residential uses to facilitate the development of the Proposed Project. This statement is incorrect. The acquisition of these properties preceded the IBEC proposal by well over a decade. The City has a longstanding policy of seeking to develop the Proposed Project site for uses that are compatible with the noise contours generated by the LAX runways. The Proposed Project is one such use. At the time the City acquired the parcels, however, the Proposed Project had not been proposed, however, so the City did not have this particular use in mind.

Silverstein-60 In responding to the comments provided in this letter, the City has at points provided additional clarification or expanded upon information and analyses provided in the Draft and/or Final EIRs. For the most part, the comments raise issues about the Draft EIR that were previously considered and addressed in the Final EIR, or raise procedural issues regarding the City’s implementation of CEQA or non-CEQA aspects of the City’s process to review and consider the merits of the Proposed Project. The comments and responses do not constitute “significant new information” as defined in CEQA Guidelines section 15088.5(a), in that they do not: (1) identify any significant impacts that were not disclosed in the Draft EIR, (2) identify any impacts that are substantially more severe than disclosed in the Draft EIR, (3) identify any feasible mitigation measures or alternatives that were not identified and required of the Proposed Project to avoid or substantially lessen significant impacts, or (4) establish that the Draft or Final EIRs were so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. Therefore, neither the Draft EIR nor the Final EIR require circulation for additional review and comment.



**EXHIBIT B**

**ADDITIONAL LETTERS AND EMAILS WITH COMMENTS ON THE PROPOSED IBEC PROJECT**

**From:** [Veronica Lebron](#)  
**To:** [Fred Jackson](#); [Mindala Wilcox](#)  
**Cc:** [Esther Kornfeld](#); [Naira Soghatyan](#); [Robert Silverstein](#)  
**Subject:** Comments & Objections to April 13, 2020 Planning Commission Special Meeting Agenda Items 5.d and 5.e; Advance Notice Request  
**Date:** Monday, April 13, 2020 6:54:17 PM  
**Attachments:** [4-13-20 \[SCAN\] Advance Notice Request; Comments & Objections to Notices of Exemption; Agenda Items 5.d and 5.e.PDF](#)

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Without wavier of our objections to tonight's Planning Commission meeting going forward, please include the attached in the record for the identified matters and please distribute to the Planning Commissioners. Please confirm receipt. Thank you.

Veronica Lebron  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: [\(626\) 449-4200](tel:(626)449-4200)  
Facsimile: [\(626\) 449-4205](tel:(626)449-4205)  
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April 13, 2020

**VIA EMAIL [fjackson@cityofinglewood.org](mailto:fjackson@cityofinglewood.org);  
[mwilcox@cityofinglewood.org](mailto:mwilcox@cityofinglewood.org)**

Fred Jackson, Senior Planner  
Mindy Wilcox, AICP, Planning Manager  
City of Inglewood, Planning Division  
1 West Manchester Boulevard, 4th Floor  
Inglewood, CA 90301

Re: Advance Notice Request and Comments and Objections to Notices of Exemption for, and of General Plan Amendment GPA-2020-01 and GPA-2020-02; CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037

Dear Mr. Jackson and Ms. Wilcox:

**I. INTRODUCTION AND ADVANCE NOTICE REQUEST.**

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Praire Ave., Inglewood. Please keep this office on the list of interested persons to receive timely notice of all hearings and determinations related to the proposed approval/adoption of the General Plan Amendments and Categorical Exemptions listed above (“Project(s)”).

Pursuant to Public Resources Code Section 21167(f) and all applicable rules and regulations, please provide a copy of each and every Notice of Determination issued by the City in connection with these Projects. We incorporate by reference all Project objections raised by others with regard to both the present Notices of Exemption and amendments/adoption of General Plan Elements. To the extent the Projects are part of or interrelated with the Clippers IBEC project, we incorporate by reference all public comments/objections to the IBEC project as well as its Draft EIR.<sup>1, 2, 3</sup>.

<sup>1</sup> See <http://ibecproject.com/>

<sup>2</sup> We specifically request that all the hyperlinks in this letter be downloaded and printed out, submitted to the agency, and be included in the City’s control file and record

for the Project, as duly provided by applicable case law.

<sup>3</sup> See [http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900\\_IBEC\\_Community\\_letters\\_1.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900_IBEC_Community_letters_1.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900\\_IBEC\\_Community\\_letters\\_2.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900_IBEC_Community_letters_2.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_Inglewood\\_Residents\\_Against\\_Takings\\_Evictions\\_Comments.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_Inglewood_Residents_Against_Takings_Evictions_Comments.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_without\\_Exhibits.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_without_Exhibits.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_EXHIBITS\\_1-4.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_EXHIBITS_1-4.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_EXHIBIT\\_5.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_EXHIBIT_5.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_EXHIBITS\\_6-7.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_EXHIBITS_6-7.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_EXHIBITS\\_8-10.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_EXHIBITS_8-10.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190222-AB900\\_IBEC\\_Comment\\_Climate\\_Resolve.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190222-AB900_IBEC_Comment_Climate_Resolve.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190304-AB900\\_IBEC\\_NRDC.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190304-AB900_IBEC_NRDC.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190422-AB900\\_IBEC\\_MSG\\_Supp\\_Lette\\_re\\_IBEC\\_App\\_Tracking\\_No-2018021056.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190422-AB900_IBEC_MSG_Supp_Lette_re_IBEC_App_Tracking_No-2018021056.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190422-AB900\\_IBEC\\_MSG\\_Supp\\_Lette\\_re\\_IBEC\\_App\\_Tracking\\_No-2018021056.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190422-AB900_IBEC_MSG_Supp_Lette_re_IBEC_App_Tracking_No-2018021056.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190621-IBEC\\_Comment\\_NRDC\\_Clippers\\_response\\_6-21-19.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190621-IBEC_Comment_NRDC_Clippers_response_6-21-19.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900\\_Inglewood\\_Comment\\_Opposition\\_to\\_Supplemental\\_Application.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900_Inglewood_Comment_Opposition_to_Supplemental_Application.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900\\_Inglewood\\_Comment\\_resident\\_letters.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900_Inglewood_Comment_resident_letters.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900\\_Inglewood\\_Comment\\_Resident\\_Letters\\_1.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900_Inglewood_Comment_Resident_Letters_1.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900\\_Inglewood\\_Comment\\_Resident\\_Letters\\_2.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900_Inglewood_Comment_Resident_Letters_2.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-Final\\_Inglewood\\_Community\\_Letters.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-Final_Inglewood_Community_Letters.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-MSG\\_AB\\_987\\_Letter\\_re\\_Supplemental\\_Application\\_with\\_exhibits.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-MSG_AB_987_Letter_re_Supplemental_Application_with_exhibits.pdf), <http://opr.ca.gov/ceqa/docs/ab900/20190628-IBEC.pdf>, [http://opr.ca.gov/ceqa/docs/ab900/20190729-Public\\_Counsel\\_letter\\_RE\\_AB\\_987\\_Inglewood\\_Arena\\_Project.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190729-Public_Counsel_letter_RE_AB_987_Inglewood_Arena_Project.pdf),

This letter is also an **Advance Notice Request** that the City of Inglewood Department of City Planning, the City Clerk's office, and all other commissions, bodies and offices, provide this office with advance written notice of any and all meetings, hearings and votes in any way related to the above-referenced proposed Projects and any projects/entitlements/actions related to any and all events or actions involving these Projects.

Your obligation to add this office to the email and other notification lists includes, but is not limited to, all notice requirements found in the Public Resources Code and Inglewood Municipal Code. Some code sections that may be relevant include Public Resources Code Sections 21092 and 21092.2.

This Advance Notice Request is also based on Government Code § 54954.1 and any other applicable laws, and is a formal request to be notified in writing regarding the Projects, any invoked or proposed CEQA exemptions, any public hearings related to the Draft or Final EIR for the IBEC project, together with a copy of the agenda, or a copy of all the documents constituting the agenda packet, of any meeting of an advisory or legislative body, by email and mail to our office address listed herein. We further request that such advance notice also be provided to us via email specifically at: [Robert@RobertSilversteinLaw.com](mailto:Robert@RobertSilversteinLaw.com); [Esther@RobertSilversteinLaw.com](mailto:Esther@RobertSilversteinLaw.com); [Naira@RobertSilversteinLaw.com](mailto:Naira@RobertSilversteinLaw.com); and [Veronica@RobertSilversteinLaw.com](mailto:Veronica@RobertSilversteinLaw.com).

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[http://opr.ca.gov/ceqa/docs/ab900/20190903-AB900\\_IBEC\\_Community\\_Letters.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190903-AB900_IBEC_Community_Letters.pdf),  
[http://opr.ca.gov/ceqa/docs/ab900/20190903-AB900\\_IBEC\\_Inglewood\\_Community\\_Letters-2.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190903-AB900_IBEC_Inglewood_Community_Letters-2.pdf),  
[http://opr.ca.gov/ceqa/docs/ab900/20190909-AB900\\_IBEC\\_MSG\\_OPR\\_Letter\\_September\\_2019\\_with\\_exhibits.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190909-AB900_IBEC_MSG_OPR_Letter_September_2019_with_exhibits.pdf),  
[http://opr.ca.gov/ceqa/docs/ab900/20191112-AB900\\_IBEC\\_AB987\\_Inglewood\\_Residents\\_Against\\_Takings\\_and\\_Evictions%20.pdf](http://opr.ca.gov/ceqa/docs/ab900/20191112-AB900_IBEC_AB987_Inglewood_Residents_Against_Takings_and_Evictions%20.pdf),  
[http://opr.ca.gov/ceqa/docs/ab900/20191114-Barbara\\_Boxer\\_GHG\\_Emissions\\_Commitment\\_Letter.pdf](http://opr.ca.gov/ceqa/docs/ab900/20191114-Barbara_Boxer_GHG_Emissions_Commitment_Letter.pdf),  
[http://opr.ca.gov/ceqa/docs/ab900/20191127-AB900\\_IBEC\\_AB987\\_Resident\\_Letters\\_Supplement\\_to\\_GHG\\_Emissions\\_Commitment.pdf](http://opr.ca.gov/ceqa/docs/ab900/20191127-AB900_IBEC_AB987_Resident_Letters_Supplement_to_GHG_Emissions_Commitment.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20191127-AB900\\_IBEC\\_AB987\\_Resident\\_Letters\\_Supplement\\_to\\_GHG\\_Emissions\\_Commitment\\_2.pdf](http://opr.ca.gov/ceqa/docs/ab900/20191127-AB900_IBEC_AB987_Resident_Letters_Supplement_to_GHG_Emissions_Commitment_2.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20191127-AB900\\_IBEC\\_AB987\\_MSG\\_Forum\\_Supplement\\_to\\_GHG\\_Emissions\\_Commitment.pdf](http://opr.ca.gov/ceqa/docs/ab900/20191127-AB900_IBEC_AB987_MSG_Forum_Supplement_to_GHG_Emissions_Commitment.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20191205-AB987\\_IBEC\\_Comment\\_MSG\\_Forum.pdf](http://opr.ca.gov/ceqa/docs/ab900/20191205-AB987_IBEC_Comment_MSG_Forum.pdf).

Finally, to the extent that an advance written request is required for any and all City hearings regarding the above-referenced project to be recorded and/or transcribed, this letter shall constitute that advance written request. Please include this letter in the record for this matter.

Please, acknowledge receipt of the Advance Notice Request above.

Please also provide a current time line of all scheduled and anticipated events, including hearings or approvals of any type, related to the Projects.

## **II. OBJECTIONS TO THE LACK OF ADEQUATE AND CONSISTENT NOTICE AND REQUEST TO RESCHEDULE THE APRIL 13, 2020 HEARING.**

On April 13, 2020, our office came across the City's *special* meeting agenda for the Planning Commission's Special Meeting on April 13, 2020, at 7:00 p.m. The agenda included Items 5(d) and 5(e) related to the Projects – i.e., amendments to the General Plan.

Based on information we have obtained, the City of Inglewood (“City”) is closed for COVID-19 reasons effective April 13 through April 27, 2020. Yet we were informed at approximately 6:00 p.m. tonight that despite the shutdown of City Hall, this Planning Commission hearing is proceeding nonetheless. That is an outrage to the concept of transparency and public participation.

We hereby object to the City's short imposed deadlines, special meetings, inadequate and inconsistent notices, and particularly, to the notice of the special meeting on April 13, 2020 during this time of the COVID-19 crisis. Moving forward with the Projects would also be in violation of the Brown Act's open meetings requirements and any decision taken today will be invalid.

We therefore request that the City reschedule the Special Meeting of April 13, 2020 and properly circulate the notice and all documents related to the Projects, including but not limited to the drafts of the Land Use and Environmental Justice Elements, to afford meaningful opportunity to the public and public agencies to comment on the proposed amendments to the General Plan – prior to any approval. The City's failure to reschedule and duly circulate the documents prior to the respective approvals of the Projects will constitute an abuse of discretion and failure to proceed in a manner required by law.

We also request that the City postpone any action or hearing on General plan amendments until and unless 90 days after the stay-at-home orders have been lifted by the California Governor. State and Planning and Zoning laws necessitate public participation for all actions, whereas the presently-utilized remote participation is often disrupted because of connection problems. The City should not take advantage of these unfortunate times, where people are fighting against the virus and some people are fighting for their lives, to rush through projects of such magnitude as amendments to the City's General Plan.

We also object to the City's imposition of strict deadlines for non-essential projects during the COVID-19 crisis given that – as evidenced by the recent letter of the League of California Cities to the Governor asking for tolling of all deadlines – city staffing shortages affect the efficiency of their work. We request that the City toll and extend its deadlines for public comment period on all environmental documents, including the Notices of Exemption for the Projects, until after the COVID-19 crisis is contained and the Governor lifts stay-at-home orders.

### **III. LACK OF MEANINGFUL OPPORTUNITY FOR PUBLIC PARTICIPATION PARTICULARLY FOR COVID-19 REASONS.**

The City cannot approve the Projects or Notices of Exemption or related findings because it cannot make a finding that those are consistent with the City's General Plan, as the City has not duly circulated the documents for the public to review and comment upon.

Further, the City may not be able to satisfy the public participation requirement under Cal. Gov't Code § 65351, which provides: "During the preparation or amendment of the general plan, the planning agency shall provide opportunities for the involvement of citizens, public agencies, public utility companies, and civic, education, and other community groups, through public hearings and any other means the city or county deems appropriate."

To the extent that the Projects, specifically, the General Plan amendments, are also interrelated with and being piecemealed from the IBEC project and its DEIR, the Projects will unavoidably facilitate or be used in furtherance of the IBEC project. In turn, the City may not rely on Categorical Exemptions to approve the Projects because doing so would facilitate the IBEC project, which project will have significant, unmitigable impacts. In other words, the use of Categorical Exemptions is facially improper because the Projects are being used to facilitate and expedite approval of the IBEC project and its DEIR. Accordingly, the approval of the instant Projects will cause or contribute to direct or

indirect physical impacts to the environment. Piecemealing the Projects out of the IBEC project and its review is independently a violation of CEQA.

**IV. THE PROPOSED LAND USE AND ENVIRONMENTAL JUSTICE ELEMENTS ARE INTERRELATED WITH THE IBEC PROJECT AND THEREFORE ARE ILLEGALLY PIECEMEALING FROM IT.**

These rushed proposed General Plan amendments come at a time when the Clippers IBEC project is being processed and promoted. The IBEC project itself requires zoning changes and amendments to the General Plan's Land Use Element.

The IBEC project has been severely criticized for its 42 environmental adverse impacts, including GHG emissions by bringing in millions of cars, causing severe traffic impacts, and adversely impacting the disadvantaged community of Inglewood, including their health and safety.

The IBEC project has been criticized for its conflicts with environmental justice principles.

Therefore, it appears that the City's efforts to amend the General Plan and include Land Use Element Amendments and the Adoption of an Environmental Justice Element on such a rushed basis, without adequate process for the public, and with zero environmental review in an obvious effort to piecemeal this issue away from where it should be analyzed as part of the IBEC project CEQA review, aims to further the IBEC project without properly and timely disclosing that purpose to the public.

**V. THE LAND USE ELEMENT AMENDMENT MAY NOT BE ADOPTED DUE TO LACK OF A CIRCULATED DOCUMENT FOR PUBLIC REVIEW AND COMMENT.**

The draft Land Use Element amendment was not available online or was not locatable in a place on the City's website that the public would easily or logically identify. Therefore, it was impossible for the public to see the amendments to be able meaningfully to comment on them. The proposed amendments may not be adopted on this additional ground.



**VI. CEQA EXEMPTIONS ARE INAPPLICABLE FOR THE GENERAL PLAN AMENDMENTS AND THE CITY HAS NOT MET ITS BURDEN TO INVOKE THE EXEMPTION.**

The City's invoked Exemptions for the proposed Projects - i.e., general plan amendments and adoption of the elements – are in error. Pursuant to the Notices, the City invokes Categorical Exemptions under CEQA Guidelines Sections 15061(b)(3) and 15060(c)(2), by claiming a “common sense” exemption.

Guidelines Section 15061(b)(3) reads:

“(3) The activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” (Emphasis added.)

Based on the quoted language, CEQA requires certainty that there is no possibility that the activity in question may have a significant effect on the environment. There cannot be such certainty where the proposal is to “clarify” the densities in the Land Use Element, where the draft Land Use Element amendment was never properly circulated to the public, and where – in the case of the common sense exemption – it is the duty and burden of the agency to prove with certainty that the Projects will have no environmental impacts.

Moreover, to the extent the Projects here are interrelated to the IBEC project and facilitate it or its components, as clearly appears to be the case, the Projects may not invoke any common sense exemption at all.

The Projects cannot be approved using categorical exemptions since it is impossible for the City to demonstrate the “certainty” of no potential environmental impacts. Exemptions from CEQA's requirements are to be construed narrowly in order to further CEQA's goals of environmental protection. See Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster (1997) 52 Cal.App.4th 1165, 1220. Projects may be exempted from CEQA only when it is indisputably clear that the cited exemption applies. See Save Our Carmel River v. Monterey Peninsula Water Management Dist. (2006) 141 Cal.App.4th 677, 697.

**VII. CONCLUSION.**

We respectfully request that the City cancel the Planning Commission of April 13, 2020 related to the Projects, duly circulate the draft amendments to the public for public comment, conduct meaningful environmental review, including as part of a recirculated IBEC project Draft EIR, and not further process the subject Projects as stand-alone approvals, much less based upon categorical exemptions under CEQA.

Very truly yours,

*/s/ Robert Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl

**From:** [Veronica Lebron](#)  
**To:** [Louis Atwell](#); [Mindala Wilcox](#); [Yvonne Horton](#)  
**Cc:** [Esther Kornfeld](#); [Naira Soghatyan](#); [Robert Silverstein](#)  
**Subject:** California Public Records Act Request | IBEC Project SCH 2018021056; Billboard Project Case No. EA-MND-2019-102  
**Date:** Wednesday, April 22, 2020 5:16:57 PM

---

Dear Public Works Officials:

This is a public records request made pursuant to Government Code § 6250, et seq.

Please provide the following documents:

1) All documents and communications - from January 1, 2020 through the date of your compliance with this request - which relate or refer to the public works, construction, or improvements on **S. Prairie St., between 10200-10212 S. Prairie St.** or within 300 feet of same in each direction, including but not limited to the purpose of these ongoing improvements and or construction, the associated projects and applicants that the construction/improvement work is related to, as well as any road or sidewalk widening plans for the noted area on S. Prairie St.;

2) All documents and communications - from January 1, 2018 through the date of your compliance with this request - which relate or refer to the **IBEC Project's (aka Murphy's Bowl) SCH 2018021056** proposed signage, or signage that would be used, in whole or in part, in connection with events at the proposed IBEC project including but not limited to communications from the planner, the City's various departments, Mayor Butts and Council members, as well as the Applicant Murphy's Bowl, LLC and its representatives and agents;

3) All documents and communications - from January 1, 2018 through the date of your compliance with this request - which relate or refer to the **Billboard Project EA-2019-102 by WOW Media, Inc.** and the installation of motion billboard signs on S. Prairie St. between 10200-10204 S. Prairie St., including but not limited to communications from the planners, the City's various departments, Mayor Butts and Council members, as well as WOW Media, Inc. and its representatives and agents.

Govt. Code § 6253.9(a) requires that the agency provide documents in their native format, when requested. Pursuant to that code section, **please also provide the requested documents, including all applications, in their native and electronic format.**

Because I am emailing this request on April 22, 2020, please ensure that your response is provided to me by no later than **May 2, 2020**. Thank you.

Also, **please include** this correspondence and CPRA request in the administrative record and council files for both the IBEC Project and the Billboard Project, as described above.

Thank you.

Veronica Lebron  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: (626) 449-4200  
Facsimile: (626) 449-4205  
Email: Veronica@RobertSilversteinLaw.com  
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=====

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=====

Message

**From:** Veronica Lebron [Veronica@robertsilversteinlaw.com]  
**Sent:** 5/1/2020 7:04:46 PM  
**To:** Artie Fields [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ac3ecaf73edc4c538f3344c6ac33b5d9-Artie Fields]; Alex Padilla [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc84bb897dac418a995d07762397a18b-Alex Padilla]; Eloy Morales Jr. [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=07c9b1e9657a4657b5036d0fd25d17ac-Eloy Morales J]; Fred Jackson [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7154513b3a5468cab5e42bf795b937b-Fred Jackson]; gdolson@cityofinglewood.org; James Butts [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9b93f1c960c40a6bca9bd40977f3940-James Butts]; Ken Campos [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=00c613199f8d4e558197d4b5a6c297fd-Ken Campos]; Mindala Wilcox [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b46bfd8a1e12482fb4f973bea21d23c4-Mindala Wilcox]; Ralph Franklin [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a774d983c3fe4be5a854b0e82a38bafc-Ralph Franklin]; Wanda Brown [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=50de847afde7413fa2672542e1f397c8-Wanda Brown]; Yvonne Horton [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=112c1fcb52164d5d9721a08db5ba3485-Yvonne Horton]  
**CC:** Esther Kornfeld [Esther@robertsilversteinlaw.com]; Naira Soghatyan [Naira@robertsilversteinlaw.com]; Robert Silverstein [Robert@robertsilversteinlaw.com]  
**Subject:** Objections to Improper Recordings; IBEC Project Case No. SCH 2018021056  
**Attachments:** 5-1-20 [SCAN] Objections to Improper Recordings; IBEC Project Case No. SCH 2018021056.PDF

Please see attached. Please confirm receipt.

Thank you.

Veronica Lebron  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
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WWW.ROBERTSILVERSTEINLAW.COM

May 1, 2020

**VIA EMAIL [yhorton@cityofinglewood.org](mailto:yhorton@cityofinglewood.org)**

Yvonne Horton, City Clerk  
City Clerk's Office  
City of Inglewood  
1 Manchester Blvd.  
Inglewood, CA 90301

**VIA EMAIL**

**[mwilcox@cityofinglewood.org](mailto:mwilcox@cityofinglewood.org)**

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

Re: Objections to Improper Recordings;  
IBEC Project Case No. SCH 2018021056

Dear Ms. Horton and Ms. Wilcox:

Please include this letter in the administrative record for the IBEC DEIR and matter.

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Prairie Ave., Inglewood. Please keep this office on the list of interested persons to receive timely notice of all hearings and determinations related to the proposed approval of the IBEC Project, Case No. SCH 2018021056.

It has come to our attention that the video and audio quality of the City's recordings related to the IBEC project – mandatory for inclusion in any administrative record for litigation challenging the validity of the IBEC EIR – are so poor as to be frequently unintelligible. This is true, for example, and without limitation, of the March 24, 2020 hearing, posted at

<https://www.facebook.com/751594431603489/videos/141867820568859/>

and for the August 15, 2017 hearing, posted at

<https://www.facebook.com/cityofinglewood/videos/1420166261412966/>

Yvonne Horton, City Clerk  
Mindy Wilcox  
City of Inglewood  
May 1, 2020  
Page 2

Moreover, based on our review of these project hearing videos, the videos have been edited, i.e., the taping is stopped then resumed, without any notification of why or warning that it will be, or clarity as to what has been omitted.

We object that the City's frequently inaudible and amateurish recordings are a violation of Pub. Res. Code 21167.6(e) governing record content. In particular, the City's recordings violate Pub. Res. Code § 21167.6(e), which sets the content of the record and requires "any transcripts or minutes" of the agency proceedings to be included in the record. Obviously, the recordings must be clear, audible and unedited/unaltered in the first place in order for complete and accurate transcripts to be prepared, as CEQA requires. Accordingly, we are putting the City on notice that its faulty recordings are a form of spoliation of evidence for which the City and project applicant will be liable.

While the City might, and we demand that it will, henceforth create clear quality and unadulterated recordings for the benefit of the public and any future judicial proceedings, it appears impossible that the City can rectify its prior spoliation of evidence, i.e., of the actual proceedings, statements and objections made at past hearings or meetings. Has the City had certified court reporters at all past IBEC-related hearings or meetings, and are transcripts presently in existence and publicly available?

Please explain how the City intends to address this situation. Thank you for your response and prompt attention to this matter.

Very truly yours,

*/s/ Robert P. Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl

cc: James T. Butts, Jr, Mayor (via email [jbutts@cityofinglewood.org](mailto:jbutts@cityofinglewood.org))  
George W. Dolson, District 1 (via email [gdolson@cityofinglewood.org](mailto:gdolson@cityofinglewood.org))  
Alex Padilla, District 2, (via email [apadilla@cityofinglewood.org](mailto:apadilla@cityofinglewood.org))  
Eloy Morales, Jr., District 3 (via email [emorales@cityofinglewood.org](mailto:emorales@cityofinglewood.org))  
Ralph L. Franklin, District 4 (via email [rfranklin@cityofinglewood.org](mailto:rfranklin@cityofinglewood.org))



Yvonne Horton, City Clerk  
Mindy Wilcox  
City of Inglewood  
May 1, 2020  
Page 3

Wanda M. Brown, Treasurer (via email [wbrown@cityofinglewood.org](mailto:wbrown@cityofinglewood.org))  
Artie Fields, Executive Director (via email [afields@cityofinglewood.org](mailto:afields@cityofinglewood.org))  
Kenneth R. Campos, City Attorney (via email [kcampos@cityofinglewood.org](mailto:kcampos@cityofinglewood.org))  
Fred Jackson, Senior Planner (via email [fljackson@cityofinglewood.org](mailto:fljackson@cityofinglewood.org))

**From:** [Veronica Lebron](#)  
**To:** [Fred Jackson](#); [Mindala Wilcox](#)  
**Cc:** [Esther Kornfeld](#); [Naira Soghbatyan](#); [Robert Silverstein](#)  
**Subject:** Objections to General Plan Amendments and Notices of Exemption for, and of General Plan Amendment GPA-2020-01 and GPA-2020-02; CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037  
**Date:** Tuesday, May 26, 2020 12:32:26 PM  
**Attachments:** [5-26-20 \[SCAN\] Objections to General Plan Amendments & Notices of Exemption.PDF](#)

---

Please include the attached letter in the administrative record for **both** the above-referenced matters **and** the Inglewood Basketball and Entertainment Center (IBEC) SCH No. 2018021056 project and its administrative record.

Please confirm receipt. Thank you.

Veronica Lebron  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: [\(626\) 449-4200](tel:6264494200)  
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May 26, 2020

**VIA EMAIL fljackson@cityofinglewood.org;**  
**mwilcox@cityofinglewood.org**

Fred Jackson, Senior Planner  
Mindy Wilcox, AICP, Planning Manager  
City of Inglewood, Planning Division  
1 West Manchester Boulevard, 4th Floor  
Inglewood, CA 90301

Re: Objections to General Plan Amendments and Notices of Exemption for,  
and of General Plan Amendment GPA-2020-01 and GPA-2020-02; CEQA  
Case Nos. EA-CE-2020-036 and EA-CE-2020-037

Dear Mr. Jackson and Ms. Wilcox:

Please include this letter in the administrative record for **both** the above-referenced matters **and** the Inglewood Basketball and Entertainment Center (IBEC) SCH No. 2018021056.

**I. INTRODUCTION.**

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Prairie Ave., Inglewood. Please keep this office on the list of interested persons to receive timely notice of all hearings and determinations related to the City's proposed adoption of the General Plan Amendments for the Land Use Element and adoption of the Environmental Justice (EJ) Element ("Project(s)") and their Categorical Exemptions.

This is a further follow up to our April 13, 2020 objection letter about the Projects. (Exh. 1 [April 13, 2020 Objections to GP Amendments].)

Please provide a current time line of all scheduled and anticipated events, including hearings or approvals of any type, related to the Projects.

## **II.    PIECEMEALING AND PIECEMEAL APPROVAL OF THE GENERAL PLAN AMENDMENT OF THE LAND USE ELEMENT VIOLATES CEQA AND STATE PLANNING AND ZONING LAWS.**

The Land Use Element amendment is proposed both as: (A) an *approval action* for the IBEC Project at Section 2.6 (DEIR, p. 2-88 [Exh. 2])<sup>1, 2</sup>, and (B) an alleged stand-alone action outside of the IBEC Project, presented on April 1, 2020 –after the close of the IBEC DEIR’s public comment period of March 24, 2020. The IBEC DEIR does not provide any detail as to land use amendments, including the density or setbacks in proposed zone changes. (DEIR, p. 2-88 [Exh. 2].)<sup>3</sup> The stand-alone Land Use amendment supplies those details.

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<sup>1</sup> For the IBEC DEIR, see <https://saoprceqap001.blob.core.windows.net/60191-3/attachment/a-wQrPYfgqX6rH7Pl0zmRPEvEaRCdDy9wtEOIK6Lkzx9y2kM5Y76yA2pvL0h1Nhm4o1xu79V9PavU-kk0> (Exh. 2 [IBEC DEIR, Section 2.6].)

<sup>2</sup> We specifically request that all the hyperlinks in this letter be downloaded and printed out, submitted to the agency, and be included in the City’s control file and administrative record for the Project and for the IBEC Project.

<sup>3</sup> **Long after** the release of the DEIR on December 27, 2019 and the close of the public review period on March 24, 2020, the Project Applicant presented its own draft of the proposed amendments to the land use, circulation, and safety elements on May 4, 2020 (also the date of close of escrow between Murphy’s Bowl and MSG Forum). See details at [http://ibecproject.com/IBECEIR\\_031888.pdf](http://ibecproject.com/IBECEIR_031888.pdf). (Exh. 3 [May 4, 2020 Draft of GP Amendments].) Not surprisingly, the IBEC Applicant *repeatedly inserted* the respective language for a new land use of the sports complex into the industrial zoning-allowed uses, goals, and policies in the Land Use Element. The Applicant also *removed* the designation of 102<sup>nd</sup> Street as a “collector street” (i.e., requiring a specific width and not subject to closure) from the Circulation Element, to allow its vacation. Both changes demonstrate that the Project is **inconsistent with** the existing General Plan and Land Use & Circulation Elements, contrary to the DEIR’s finding of consistency. And both changes are illegal since it is the Project that must be consistent with the General Plan, not the opposite. Finally, the after-the-fact presentation of the General Plan amendments rather than incorporating those in the IBEC DEIR makes the IBEC DEIR fatally flawed, including because these omissions impaired informed meaningful public comment and informed public participation.

The review of both actions shows that they are **interrelated and complementary** parts of a single **coordinated endeavor** to achieve **increased density and intensity** to further, first and foremost, the **IBEC Project** currently proposed for City approval.<sup>4</sup>

**A. Residential Density Increases.**

At the outset, we object to the City's *labeling* of the proposed amendments as "clarifications," which misinforms and downplays the scope and impact of the amendments.

The Land Use Element amendments *add* a number of people for each dwelling unit and, for that purpose, use the California Department of Finance's 3.02 multiplier. The 3.02 multiplier is not supported by substantial evidence, since the majority of new projects are comprised of primarily single and one-bedroom units for a maximum two occupants. Moreover, the City could choose lower multipliers, such as the 2.7 multiplier from SCAG.<sup>5</sup> The City's choice of a bigger multiplier leads to a higher *allowable* density, which, in turn, will lead to more impacts (e.g., traffic increase, GHG increase, utility usage, need for public services, and open space).

Specifically, the density of the major mixed-use projects in the amendments furthers the IBEC Project's proposed hotel, for which the IBEC DEIR did not provide any detail beyond the approximate number of "up to 150 rooms." The new standard will allow the Project to enlarge and modify the IBEC DEIR's vague, and legally non-compliant project description.

---

<sup>4</sup> The City's agenda for the Public Hearing on May 6, 2020, included three items, two of which are the General Plan amendments described here, and the third is listed as related to parking districts to accommodate major event patrons. Although the issue has been pulled out from the PC agenda, it was agendaized for the City Council agenda of May 5, 2020. The staff report for the May 5, 2020 agenda on the issue shows the parking districts are associated with the IBEC project.

<sup>5</sup> Other jurisdictions have been using SCAG's more conservative 2.7 multiplier (e.g., City of Glendale, South Glendale Community Plan, see <https://www.glendaleca.gov/home/showdocument?id=42160>).

**B. Building Intensity Increases: Industrial Zone.**

The Land Use Element amendments also propose “building intensity” increases, which specifically intensifies the industrial land use designation.

Based on the table in the Resolution, the **industrial** use is provided at **1380% building intensity**. Notably, the IBEC Project proposes to redesignate commercial lots into industrial. (DEIR, p. 2-88.) The stand-alone amendment will qualify the IBEC lots for the maximum 1380% building intensity. Apart from the Resolution, the staff report mentions that those intensity parameters are related to the setbacks and landscaping. The IBEC Project has been criticized for its inadequate setbacks and landscaping. The proposed amendments will further the IBEC Project by purportedly making it consistent with the General Plan, again implicating clear piecemealing violations in and from the IBEC DEIR.

We further object to the City’s failure to explain in the proposed stand-alone Land Use Element amendment *what* the proposed percentage intensities *practically* mean, to allow informed decisionmaking and comment.

**C. Building Intensity: Medical Office Uses.**

The proposed amendments include a separate intensity for hospital-medical/residential land use designation set at 390%. This is applicable to the 25,000 sq. ft. “Sports Medicine Clinic,” included in the project. (DEIR, p. S-4). We similarly object to the City’s failure to explain the practical meaning of the proposed intensities, and to the obvious piecemealing violations in and from the IBEC DEIR.

**D. Lack of Baseline Disclosure to Enable Meaningful Informed Public Comment.**

Neither the IBEC DEIR nor the recently published Resolution for General Plan Land Use Element density/intensity provides the *existing* density/intensity, therefore depriving the public – and decisionmakers – from setting the baseline conditions and consequently assessing the scope of the increases in density/intensity. CEQA requires setting the correct baseline for any project in order to begin/enable any environmental review.

**E. The Invoked CEQA Exemptions Are Improper.**

The City's invoked two CEQA exemptions under Guidelines §§ 15061(b)(3) and 15060(c)(2) are improper as both require a finding that the project *may not* have an environmental impact. Such finding cannot be made in this case. As shown above and with the example of the IBEC Project, the proposed amendments have the *potential* to impact the environment directly or indirectly. Moreover, in the staff report only, the City appears to invoke an exemption under CEQA Guidelines § 15305 for "minor alterations" related to less than 20% slope. The exemption is inapplicable since it applies to "minor" alterations and it is for specific physical development projects.

To comply with CEQA, the IBEC DEIR must be recirculated to include the proposed General Plan amendments, and provide opportunities for public review and comment. The proposed General Plan amendments of the Land Use Element – whether together with the IBEC Project or separate from it – cannot proceed without CEQA review and should incorporate all the missing information about the scope of practical changes, their impacts, and the baseline assumptions, as indicated above.

**III. PIECEMEALING OF THE GENERAL PLAN AMENDMENT:  
CIRCULATION ELEMENT.**

The City's Land Use Element amendment was improperly adopted because of the lack of corresponding amendments to the Circulation Element of the General Plan, as mandated by the correlation requirement under Govt. Code § 65302. The City may not allow more people per unit and more intensity per commercial/industrial/medical structure, yet piecemeal the issue of related traffic/pedestrian circulation and adopt those separately.

The IBEC Project includes amendments to the Circulation Element, but those are purportedly narrow and limited to "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." (DEIR, p. 2-88; pdf p. 228.)

The limited General Plan amendments of the Circulation element disclosed in the IBEC DEIR violate CEQA's mandate of good faith disclosure. Also, the IBEC DEIR's limited Circulation element amendment and the lack of the Circulation Element Amendment to support the actual land use changes of the IBEC Project and the Density/Intensity of the General Plan Land Use Element amendments violate the correlation requirement under Govt. Code § 65302.

**IV. PIECEMEALING OF THE GENERAL PLAN AMENDMENT AND  
PIECEMEAL ADOPTION OF THE ENVIRONMENTAL JUSTICE  
ELEMENT, LACK OF PROPER NOTICE, NON-CONCURRENT  
ADOPTION, MISLEADING INFORMATION, AND IMPROPER USE OF  
EXEMPTIONS.**

**A. The IBEC DEIR Failed to Disclose EJ Element Adoption.**

The IBEC DEIR downplayed EJ (DEIR, p. 3.12-16; pdf p. 1010 [Exh. 4]). It did not disclose the need for adoption of the EJ Element despite Section 2.6 (Approval Actions) amendments to three elements of the General Plan, *necessitating* an EJ Element *concurrent* adoption under Govt. Code § 65302(h)(2). We raised objections to the City's EJ piecemealing on April 13, 2020, which we incorporate by reference herein.

**B. Lack of Proper Notice.**

We object to the City's inadequate notice of the adoption of the EJ Element, especially in these COVID-19 critical times. The City published a Notice of Exemption on April 1, 2020, included it in two Planning Commission agendas, and yet produced the *link* to the actual text of the Draft EJ element only in the agenda packet for its May 6, 2020 hearing.<sup>6</sup> The City provided limited time and possibility for the public to find out about the text of the EJ Element and to review it prior to any amendments.

That workshops were conducted with the public on the EJ Element is irrelevant. During the workshops, the public was merely surveyed about concerns and had no chance to see the actual amendments and thus to participate "*during* the preparation" of the amendments. Gov't Code § 65351.

**C. Misleading Information in the EJ Element and its Prior Outreach.**

The City's EJ Element, as well as the workshops leading to it, have strayed from the EJ Element principles to ensure the *health* of the disadvantaged communities, as contemplated and mandated by the State Planning and Zoning Laws. The EJ workshops were reportedly focused on affordable housing. (Exh. 6 [Article re EJ Workshop].)

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<sup>6</sup> Based on our office's continuous searches for the agenda packet for the May 6, 2020 hearing, it was not posted on the City's website until April 30, 2020 at 8:05 pm. (Exh. 5 p. 10 [City Agendas page printout on May 1, 2020].)



The City's EJ Element acknowledges that the majority of Inglewood's population constitutes a disadvantaged community; yet, it focuses on *additional funding* Inglewood is eligible for, instead of proposing practical development policies to avoid air pollution and to protect the health of the population. (Exh. 7 p. 5 [EJ Element].)<sup>7</sup>

Moreover, the City's EJ Element does nothing more than propose what is **already guaranteed**; e.g., "no net loss of affordable housing" (EJ Element, p. 23) is guaranteed under AB 2222 in 2014,<sup>8</sup> "compliance with state and federal environmental regulations in project approvals" (EJ Element, p. 16).<sup>9</sup> Other policies in the provision of housing simply reiterate *aspirational* rather than *mandatory* policies (EJ Element, pp. 22-23).

The majority of EJ policies promote Developer-favored and community disfavored transit-oriented development (TOD) – i.e., higher density and reduced or no parking, which should be re-evaluated in view COVID-19's social distancing rules and long-term behavioral changes, resulting in the underlying assumptions undergirding the City's analysis being called into question.

Moreover, the EJ Element proposes vague measures to improve connectivity, with their own potential impacts. For example, the EJ Element does not explain what the EJ's "traffic calming measures" or "promote pedestrian movement" mean. Typically, one of the commonly known "traffic calming" methods is merging/removing lanes on arterial streets with heavy traffic and widening the sidewalks instead, to reduce the flow of cars and improve pedestrian walking experience. *Assuming* that is among the *unidentified* traffic-calming measures, such measure may have its own impacts, such as shifting the traffic from central streets onto the adjacent narrower streets and resulting in more traffic

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<sup>7</sup> <https://www.cityofinglewood.org/DocumentCenter/View/14211/Environmental-Justice-Element>

<sup>8</sup> [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140AB2222](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB2222)

<sup>9</sup> Also, the City's incorporation of "compliance" with state and federal regulations for GHG emissions violates the "additionality" principle, as such compliance is included in the baseline assumptions of every project. See p. 32 at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf> (Exh. 8 [Additionality].)

gridlock and associated delays in response times of emergency, fire, and police services, and/or pedestrian safety issues. All such issues should have been disclosed, analyzed and mitigated. They were not, thus constituting additional violations of law.

Last, the drafted EJ Element ignored numerous concerns raised by the public, including danger to bike riders, constrained parking, unsafe buses (EJ Element, Appendix A, p. 1); more police patrols needed in the City (EJ Element, Appendix A, p. 2); “the Clipper’s arena and Forum area have huge increases in traffic and pollution from traffic. Rents are also skyrocketing”, more bike lanes needed, “overcrowdings is also an issue and there is an increase in the spread of diseases due to overcrowding, rents are increasing the most near the stadiums.” (Appendix A p. 4, EJ Element.)

In sum, the drafted EJ Element sets low and vague standards for EJ and will thereby induce and rubberstamp any large-scale residential or commercial transit-oriented developments, and particularly the IBEC Project, relying on illusory mitigation measures, such as mass transit, unspecified traffic calming methods, vacation of streets or merging of lanes, and reduced parking. The IBEC Project has been repeatedly criticized for its environmental inequity.<sup>10</sup> With the EJ element as proposed, the *IBEC Project will evade* the EJ mandates under state laws meant to ensure the health of Inglewood’s disadvantaged population and such population’s genuine involvement in the land use decisions prior to any large scale project approval, particularly the IBEC Project approvals. As a reasonably foreseeable consequence of the proposed lower standards, the proposed EJ Element will fail to identify and mitigate EJ violations when projects – and particularly the IBEC Project – severely impact human life and safety, which is a CEQA concern.

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<sup>10</sup> See e.g, NRDC’s comment (“project that has little or **no social utility for the residents of Inglewood** who will bear the **brunt of these impacts** - including more air pollution in an already heavily-polluted area - and **who are not the target audience for expensive professional basketball ticket**”) [http://ibecproject.com/IBECEIR\\_029924.pdf](http://ibecproject.com/IBECEIR_029924.pdf); or public community comments (“project will have a **very damaging impact on our environment in terms of air quality as well as noise, traffic** and more. Can you please think about **all the cars spewing emissions** in our community? What are the **real impacts to our children and our older people?**”) [http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900\\_IBEC\\_Community\\_letters\\_1.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900_IBEC_Community_letters_1.pdf) (**Exh. 9 [NRDC and Public Comments].**)

**D. The EJ Element Adoption Is Not Exempt from CEQA, Due to Its Potential to Cause Environmental Impacts.**

The City's invoking of the common sense exemption for the adoption of the EJ Element is inappropriate in view of the Element's *potential* to cause environmental impacts and *potential* to allow large scale projects, such as the IBEC Project, to evade mitigation of health and other environmental impacts on the population. The absence of an accurate, stable and finite project description, as well as the vagueness of the proposed measures (e.g., traffic calming, promoting pedestrian flows) makes the proposed EJ policies further *capable* of causing unmitigated environmental impacts.

The analysis of the inapplicability of CEQA exemptions in the Land Use Element section, supra, applies here as well; we incorporate it by reference.

**V. CONCLUSION.**

We respectfully request that the City Council reject the proposed Land Use Element amendments and Environmental Justice Element and require staff to supplement the missing information and comply with the law as detailed above. We also request that the City review the proposed amendments to the General Plan and their impacts *in conjunction with* the IBEC Project, and to fully disclose, evaluate and mitigate those in the IBEC DEIR, as either *part of* the IBEC Project or – at a minimum – cumulatively as *related projects*. Finally, we object to the City's use of categorical exemptions, and request meaningful CEQA review of impacts of both Projects.

Very truly yours,

*/s/ Robert Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl  
Encls.

**Note to Reader:**

**All Exhibits attached to this letter are a part of  
the Administrative Record and can be found at  
[ibecproject.com](http://ibecproject.com)**

# **EXHIBIT 1**

**From:** [richard.garcia](#)  
**To:** [Mindala.Wilcox](#)  
**Subject:** Clippers Arena  
**Date:** Monday, June 8, 2020 11:13:03 AM

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Hi,

Will you be removing Church's Chicken on the corner? If yes, I know there will be retail/restaurants built. Re-locate Church's in there. If not, I love Louisiana's Fried Chicken. They are the best. I like the one on Manchester/Normandie.

Do you know if the Clippers will have a Clippers store selling their merchandise? I would love that.

If you planning on big name retail over there like Walmart. That's a Hell to the No. Anything but Walmart.

I notice there's no handicap parking close to Staples Center. Will there handicap parking close to the Clippers Arena? There's should should free parking for the disabled.

Where's the public hearing at? Address? I may go.

Richard  
A Huge Clippers Fan

On Sun, Jun 7, 2020, 1:40 PM Mindala Wilcox <[mwilcox@cityofinglewood.org](mailto:mwilcox@cityofinglewood.org)> wrote:

Thank you for your comments on the Draft Environmental Impact Report (DEIR) for the Inglewood Basketball and Entertainment Center. A response to your comments has been provided in the Final Environmental Impact Report (FEIR) which can be found on the following webpage:

<https://www.cityofinglewood.org/1036/Murphys-Bowl-Proposed-NBA-Arena>

Also attached to this email for your reference is the Planning Commission public hearing notice for June 17, 2020.

Respectfully,

**Mindy Wilcox, AICP** : Planning Manager : City of Inglewood  
Economic and Community Development Department

Planning Division : One Manchester Boulevard : Inglewood, CA 90301  
V(310) 412-5230 : [mwilcox@cityofinglewood.org](mailto:mwilcox@cityofinglewood.org)

**E**XCELLENCE in Public Service. **C**OMMITMENT to Problem Solving. **D**ETERMINATION to Succeed.



PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL.

**From:** [Veronica Lebron](#)  
**To:** [Aisha Thompson](#); [Mindala Wilcox](#); [Yvonne Horton](#)  
**Cc:** [Esther Kornfeld](#); [Naira Soghatyan](#); [Robert Silverstein](#)  
**Subject:** Deprived of Public Participation during June 9, 2020 City Council Meeting  
**Date:** Tuesday, June 9, 2020 2:38:29 PM

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Dear City Clerk, Mayor and City Council Members:

We have repeatedly attempted to call the City at the telephone number indicated on the City Council Agenda for June 9, 2020.

However, we have continuously received an auto response that the access code was not recognized. Please see attached the video of our failed attempts to call today.

Let the record reflect that we have been deprived of the possibility to submit a public comment during the meeting, in violation of the Brown Act.

We have also watched the meeting and obtained a new code 0833144#. However, we were unable to connect and participate in the meeting, other than in "listening mode" and we were not provided the opportunity to speak despite dialing the available mode of raising the hand.

Please include this correspondence in the administrative record of both General Plan Amendments before you today, as well as the administrative record for the IBEC DEIR.

Thank you.

Veronica Lebron  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: [\(626\) 449-4200](tel:(626)449-4200)  
Facsimile: [\(626\) 449-4205](tel:(626)449-4205)  
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Website: [www.RobertSilversteinLaw.com](http://www.RobertSilversteinLaw.com)

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The information contained in this electronic mail message is confidential information intended only for the use of the individual or entity named above, and may be privileged. The information herein may also be protected by the Electronic Communications Privacy Act, 18 USC Sections 2510-2521. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone (626-449-4200), and delete the original message. Thank you.

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June 9, 2020

**VIA EMAIL fljackson@cityofinglewood.org;**  
**mwilcox@cityofinglewood.org**

Fred Jackson, Senior Planner  
Mindy Wilcox, AICP, Planning Manager  
City of Inglewood, Planning Division  
1 West Manchester Boulevard, 4th Floor  
Inglewood, CA 90301

Re: Further Objections to General Plan Amendments and Notices of Exemption  
for, and of General Plan Amendment GPA-2020-01 and GPA-2020-02;  
CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037

Dear Mr. Jackson and Ms. Wilcox:

Please include this letter in the administrative record for **both** the above-referenced matters **and** the Inglewood Basketball and Entertainment Center (IBEC) SCH No. 2018021056. This letter applies to **both** June 9, 2020 City Council hearing Agenda Items PH-1 and PH-2.

**I. INTRODUCTION.**

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Prairie Ave., Inglewood. Please keep this office on the list of interested persons to receive timely notice of all hearings and determinations related to the City's proposed adoption of the General Plan Amendments for the Land Use Element and adoption of the Environmental Justice (EJ) Element ("Project(s)") and their Categorical Exemptions.

Please also provide us timely notice of any filing of the Notice of Exemption or Notice of Determination under Pub. Res. Code § 21167(f) for **both** the amendment of the Land Use Element and the adoption of the Environmental Justice Element.

This is a further follow up to our April 13, 2020 and May 26, 2020 objection letters about the Projects. (**Exh. 1** [May 26, 2020 Objections to GP Amendments, which includes April 13, 2020 Objection as an Exhibit].)

**II. THE CITY'S PROPOSED AMENDMENTS/ADOPTION OF LAND USE AND ENVIRONMENTAL JUSTICE ELEMENTS VIOLATE CEQA'S MANDATE FOR AN ACCURATE, STABLE, AND FINITE PROJECT DESCRIPTION.**

CEQA's standard for a project description is well-settled:

“An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.’ (Cit. omit.) A **narrow view** of a project could result in the fallacy of division, that is, overlooking its cumulative impact by separately focusing on isolated parts of the whole. (Id., at p. 1144, 249 Cal.Rptr. 439.) An **accurate, stable and finite** project description is the sine qua non of an informative and legally sufficient EIR; the defined project and not some different project must be the EIR's **bona fide** subject. (Cit. omit.) ‘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.’ (Cit. omit.)” Burbank-Glendale-Pasadena Airport Authority v. Hensler (1991) 233 Cal.App.3d 577, 592. (Emph. added.)

The Court's statement pertaining to the EIR's need for an “accurate, stable and finite” and “bona fide” project description applies to all projects under CEQA. The City's project descriptions in both Land Use and Environmental Justice Element amendments/adoption do not pass muster under these standards.

**A. Land Use Element Amendment.**

The Land Use Element project description is flawed, including because of: (1) piecemealing from the IBEC Project; and (2) vague or incomplete Project description.

It is settled that “the selection of a narrow project as the launching pad for a vastly wider proposal frustrate[s] CEQA’s public information aims . . . [The] calculated selection of its truncated project concept [is] not an abstract violation of CEQA.” County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 199–200; Pub. Res. Code § 21168.5. The City here has used a *narrow* project description – Land Use Element amendment or even worse “clarification” – to avoid disclosure of the accurate project description of the planned amendments. Only in conjunction with the IBEC Project can *some* of the proposed density and building intensity changes be fully comprehended and evaluated.

For example, the IBEC DEIR discloses only cursory information about the hotel planned on the IBEC site: “An up to 150-room limited service hotel and associated parking would be developed east of the Parking and Transportation Hub Structure.” IBEC DEIR, p. S-6. (Exh. 2 [IBEC DEIR].) Later, on May 7, 2020 – through the IBEC Project Applicant’s proposed Overlay Zone proposals included in the IBEC administrative record and unannounced to the unwitting public – it became clear that the hotel will have at least two types of rooms:

“(C) Hotel. Two (2) parking spaces, plus one (1) parking space for each bedroom or other room that can be used for sleeping purposes up to ninety (90) rooms, plus one (1) parking space for each additional **two (2) bedrooms or other rooms that can be used for sleeping purposes in excess of ninety (90) rooms.**” (Exh. 3, pdf p. 9 [SE Overlay Zone Proposals, May 7, 2020], *emph. added.*)

Thus, the proposed Land Use Element density clarifications allowing the highest density of up to 85 units per acre for mixed-use residential projects will enable the IBEC Project to build a hotel of up to 150 rooms accommodating much more population than before and still be in alleged substantial conformance with the General Plan’s *new* Land Use Element density.

Also, the IBEC Project Overlay Zone proposal – if adopted – indicates that any lot line adjustments of the adjoining parcels to the current IBEC Project will be allowed and will require only a ministerial approval. Put differently, if the vaguely described hotel site in the IBEC DEIR needs a lot line adjustment and expands into the adjoining parcels, then such expansion will automatically be covered by the new intensity/density in the Land Use Element. (Exh. 3, pdf p. 14 [SE Overlay Zone].)

Another example of inadequate project description in the Land Use Element Amendments is the *vague* building intensity of the industrial and commercial zones. In particular, the proposed 1380% building intensity for industrial obtains practical significance and clarification only in conjunction with the IBEC Project. Thus, as disclosed by the IBEC Project Applicant's own draft of the Overlay Zone on the site, the IBEC arena will have no setbacks:

“Section 12-38.95.2 Front Yard, Side Yard, and Rear Yard Setbacks

(A) Sports and Entertainment Complex. No front yard, side yard, or rear yard shall be required, except as provided in the SEC Design Guidelines.

(B) Hotel. Front yard, side yards, and rear yards shall conform to the requirements of Section 12-16.1 of this Chapter.” (Exh. 3 pdf p. 8 [SE Overlay Zone].)

The “Sports and Entertainment Complex” is what includes all IBEC Project components (e.g., retail, medical office, arena), other than the hotel site. Thus, the elimination of setbacks in the IBEC Project sheds light onto the otherwise vague building intensity percentages in the proposed Land Use Element amendments.

The IBEC Project proposes a Land Use Element map and text amendment to *add* the IBEC Project and its proposed uses in the specified location and *strikes* from the General Plan everything that may hinder the Project, such as the collector street, 102nd Street, from the Circulation Element. (Exh. 4 [IBEC Project's Applicant Murphy's Bowl's Proposed General Plan Amendments in IBEC Project].) Also, the IBEC's proposed land use amendments indicate that there are *other unidentified* uses, such as “complementary transportation and circulation facilities,” “in addition to” parking serving the arena and related uses for approximately 4,125 vehicles. (Id. at pdf p. 3.)

Thus, the Land Use Element amendments – because of piecemealing from the actual projects pending before the City and particularly the IBEC Project, as well as their inaccurate and vague description – provide a narrow and curtailed project description in violation of CEQA. The inadequate description further deprives the public and the decisionmakers of the ability to properly comprehend and evaluate the full scope and the “environmental price tag” of the proposed Land Use Amendments, and subverts CEQA's environmental protection mandates. Natural Resources Defense Council, Inc. v. City of Los Angeles (2002) 103 Cal.App.4th 268, 271.

The City also violates CEQA's accurate project description mandate by labeling the Land Use Amendments as "clarifications." "Where the agency provides an inconsistent description portraying the Project as having "no increase" while at the same time allowing for substantial changes in the existing conditions, [it] fails to adequately apprise all interested parties of the true scope and magnitude of the project, amounting to prejudicial abuse of discretion for failure to provide a stable and consistent project description." San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 657. "By giving such conflicting signals to decisionmakers and the public about the nature and scope of the activity being proposed, the Project description [is] fundamentally inadequate and misleading." Id. at 655-657. A conflicting project description results in understated impact analysis. Id. at 672.

The City's project description is misleading and inaccurate, and violates CEQA.

**B. Inadequate Project Description of the Environmental Justice Element.**

"Where the agency uses an erroneous or entirely speculative project description as justification for its approval of the Project, but never intended to actually proceed with that project, such a situation would constitute much more insidious conduct than a failure to comply with CEQA. CEQA contemplates serious and not superficial or pro forma consideration of the potential environmental consequences of a project." Burbank-Glendale-Pasadena Airport Authority v. Hensler (1991) 233 Cal.App.3d 577, 593 (internal quotes marks om.). Such is the situation with the Environmental Justice (EJ) Element's project description, rendering it inadequate.

While the Project description claims to ensure environmental justice to Inglewood's disadvantaged community, the proposed measures – which solely require compliance with the *existing* state mandates in place or further bless transit-oriented development and completely ignore public concerns about the bus, street, or bicycling safety and lack of parking, as well as air pollution, traffic, and rent increases due to bigger projects, such as the stadiums – mislead the public about the proposed "safeguards." The proposed EJ Element fails to safeguard against health impacts or promote public participation.

The City's drafted EJ Element constitutes not only a CEQA violation for its inaccurate project description, but "more insidious conduct" for its misleading and empty assurances to the disadvantaged population.

**III. THE CITY'S RESPONSES TO OUR OBJECTIONS ARE UNAVAILING AND LACK GOOD FAITH.**

General Plan amendments under both CEQA and state planning and zoning laws require meaningful public participation, which includes meaningful good faith responses to public comments. The State of California requires citizen participation in the preparation of the General Plan. Gov't Code § 65351 provides: "During the preparation or amendment of the general plan, the planning agency shall provide opportunities for the involvement of citizens, public agencies, public utility companies, and civic, education, and other community groups, through public hearings and any other means the city or county deems appropriate." (Emphasis added.)

CEQA requires "good faith reasoned" responses as well. "The requirement of a detailed statement helps insure the integrity of the process of decision by precluding stubborn problems or serious criticism from being swept under the rug." Sutter Sensible Planning, Inc. v. Board of Supervisors (1981) 122 Cal.App.3d 813, 820-821.

The City's responses to our May 26, 2020 comment letter did not evince good faith, as detailed below.

**A. Neither the Land Use Element Amendment nor the EJ Element Adoption Qualifies for a Common Sense Exemption.**

The City's arguments in support of its categorical exemptions and particularly including the common sense exemption are unsupported, especially given that the City is rewriting – and increasing – the density and intensity of all City zones to accommodate first and foremost the IBEC project pending before the City, and similar large scale projects<sup>1</sup>. First, substantial evidence is not argument or speculation, but facts or a reasonable inference supported by facts. Guidelines § 15064(f)(5).

Second, the City's reliance on Davidon in the June 9, 2020 Staff report for the EJ Element Adoption for the proper judicial review standard applied for categorical exemptions and the common sense exemptions is misplaced. Davidon distinguishes the

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<sup>1</sup> The City does not respond to our objection of IBEC Project piecemealing – in both Land Use and EJ Element Amendment cases – short of claiming that the General Plan amendments are not a "consequence" of the IBEC Project. Apart from the City's misperception of the applicable terms, the City ignores our basic claim that both the Land Use and EJ Element were or should have been part of the IBEC Project to legally enable the Project, and not its reasonably foreseeable consequence.

common sense exemption from other categorical exemptions and attaches no *implied finding* of substantial evidence of no significant impacts:

“In the case of the common sense exemption, however, the agency’s exemption determination is not supported by an implied finding by the Resources Agency that the project will not have a significant environmental impact. Without the benefit of such an implied finding, the agency must itself provide the support for its decision before the burden shifts to the challenger. Imposing the burden on members of the public in the first instance to prove a possibility for substantial adverse environmental impact would frustrate CEQA’s fundamental purpose of ensuring that government officials “make decisions with environmental consequences in mind.” (Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 283, 118 Cal.Rptr. 249, 529 P.2d 1017.)” Davidon Homes v. City of San Jose (1997) 54 Cal.App.4th 106, 116.

Finally, the City’s arguments for the common sense exemption for both Land Use and EJ Elements – which is essentially a first-tier issue of whether the activity is a project under CEQA – is inaccurate in view of well-settled case law:

“First and foremost, we point out that we are not dealing with an abstract problem. Again, this case does not involve – as the tone of some of defendants’ arguments suggest – the question whether any LAFCO approval of any annexation to any city may have a significant effect on the environment. This is not the case of a rancher who feels that his cattle would chew their cud more contentedly in an incorporated pasture. No one makes any bones about the fact that the impetus for the Bell Ranch annexation is Kaiser’s desire to subdivide 677 acres of agricultural land, a project apparently destined to go nowhere in the near future as long as the ranch remains under county jurisdiction. The city’s and Kaiser’s application to LAFCO shows that this agricultural land is proposed to be used for “residential, commercial and recreational” purposes. Planning was completed, preliminary conferences with city agencies had progressed “sufficiently” and development in the near future was anticipated. In answer to the question whether the proposed annexation would result in urban growth, the city answered: “Urban

growth will take place in designated areas and only within the annexation.”

It therefore seems idle to argue that the particular project here involved may not culminate in physical change to the environment.” Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 281.

And again:

“Moreover, there is no evidence regarding the possible cumulative effect of repetitive tests of this nature in the same area. Finally, it cannot be assumed that activities intended to protect or preserve the environment are immune from environmental review. (See, e.g., Dunn–Edwards Corp. v. Bay Area Air Quality Management Dist. (1992) 9 Cal.App.4th 644, 11 Cal.Rptr.2d 850; Building Code Action v. Energy Resources Conservation & Dev. Com. (1980) 102 Cal.App.3d 577, 162 Cal.Rptr. 734.)” Davidon Homes v. City of San Jose (1997) 54 Cal.App.4th 106, 118–119.

The City’s arguments that general plan amendments (both EJ and Land Use Elements) are not a specific physical project or that those are aimed at eliminating environmental impacts (as in case of EJ Element) ignore long-standing legal authority.

**B. Land Use Element Amendments.**

The City does not address our May 26, 2020 letter objections and evidence in its staff report prepared for the June 9, 2020 Council Hearing and does not even acknowledge receipt of such or include it in its staff report. (Staff Report, p. 5.) We reiterate our request that our May 26, 2020 Objection letter be included in the administrative record and files of each General Plan case, including the one for the Land Use Element.

At the same time, the City did improperly *alter* its previously issued Notice of Exemption and *added* another exemption,<sup>2</sup> which we have noted in our May 26, 2020

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<sup>2</sup> The City’s alteration of the Notice of Exemption and yet leaving the notice issue date as April 1, 2020 may qualify as a criminal violation under Govt. Code §§ 6200-6203. We note that the City has been previously challenged for altering its records.



Objection letter as being added in the May 26, 2020 staff report but not reflected on the Notice of Exemption on April 1, 2020. The City revised the entire Notice, added the new Guidelines exemption section and purported explanation, signed the Notice *again* and yet back dated the Notice of Exemption leaving it with the initial April 1, 2020 issue date, without noting the change to the public. (**Exh. 6** [initial Exemption Notice and the subsequent altered in the staff report for June 9, 2020<sup>3</sup>].)

The City appears to present the Land Use Element amendments as a duty it has under Govt. Code § 65302(a), which states: “The land use element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan.” Yet the City’s invocation of the statute does not address either our prior objection that the City fails to identify the “baseline” to allow the commencement of any environmental impact analysis or the derivative problem of the City’s failure to mitigate any impacts. For example, the statute does not require the City to identify *the* population density, but rather the “standards” of population density.

Historically, the population *standards* have been expressed through dwelling units per acre for residential zones, and floor area ratio for commercial and industrial sites; the multiplier for population density does not need to be uniformly applied since low density units may have more occupants, whereas newly built units in high-density zoned locations might not accommodate more than two people in one unit. (E.g., **Exh. 7**, pp. L-1 and L-3-4 [excerpt from Land Use Element of the Town of Gatos].) Thus, the City’s response that it merely attempts to comply with the law and provide “clarifications” does not address our concerns about the misuse or misapplication of a high multiplier, where there are lower multipliers available (e.g., SCAG multiplier of 2.7). The City’s response does not explain why the high multiplier is used throughout Inglewood – regardless of the disproportionate distribution of population per units in various residential zones.

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(**Exh. 5** [article re City’s editing of videos.] )

<sup>3</sup> The City’s agenda with the hyperlinked staff reports was published on the City’s website at 8:28 p.m. on Friday, June 5, 2020. (**Exh. 8** [agenda posted time].) The City’s continuous posting of the City Council hearing agenda after 8 p.m. for a meeting where the comments need to be submitted to the City Council at 12 p.m. on Tuesdays, adversely affects the public’s ability to be apprised of the agenda items and to prepare a meaningful written response.

The City does not address why it chose to express building intensity in percentages rather than in floor area ratios and height restrictions. For example, the City did not address the issue of why it designates 1380% intensity to industrial zoning – which *coincidentally* enables the IBEC Project now pending review before the City – without explaining any setback or height restrictions, or land occupancy, for the public to understand how such percentage of building intensity is calculated and what it means in reality.

C. **Adoption of the Environmental Justice (EJ) Element And Its Exemptions.**

The City's responses to our objections to the proposed EJ Element Adoption are also unavailing.

The City's response to our claim that the EJ Element provides no enforceable policies is that the General Plan merely provides recommendations and not mandatory policies. This position is counter to the long-standing principle that a general plan is a "constitution" for future development to which all other land use decisions must conform. See Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal3d 553, 570. Moreover, it ignores the fact that state law provides special significance to the general plan elements by designating those "mandatory." Third, as stated by the Office of Planning and Research – given the authority by the Legislature to issue general plan guidelines – a General Plan may not be a "wish list" or a vague view of the future but rather must provide a concrete direction. Office of Planning and Research, State of California General Plan Guidelines (1990), p. 5. See also Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Supervisors (1998) 62 Cal. App. 4th 1332, 1341 (a land use decision (zoning ordinance) must be deemed inconsistent with a general plan if it conflicts with a single, mandatory general plan policy or goal); Govt. Code §§ 65561(c) & 65562.

The City does not address or reject our claim that the EJ Element, as drafted, relaxes the standards and will enable the IBEC Project. As such, the City's arguments about the common sense exemption's alleged applicability are not supportable. See also Sec. III(A), supra.

Similar to the Land Use Element's later-added exemption in the staff report, which we raised in our May 26, 2020 Objection Letter, the City's June 9, 2020 staff report includes an *additional* exemption, which is not listed on the City's Notice of Exemption

even in the June 9, 2020 agenda package.<sup>4</sup> Without waiving any objection to the City's continuous efforts to end-run CEQA or deprive the public of the opportunity to be fairly apprised and challenge the City's CEQA claims, we note that the City's late-inserted CEQA exemption for the EJ Element adoption is inapposite. The City invokes the *new exemption* "under the Class 8 (Section 15308) exemption for actions Mayor and Council Members Public Hearing for GP A-2020-00I (EJ Element) taken by **regulatory agencies** to assure the maintenance, restoration, enhancement, or protection of the environment." (June 9, 2020 Council Hearing Staff Report, pp. 7-8, *emph. added*). The exemption is inapplicable since the City is not a regulatory agency, which is described in CEQA Guidelines § 15307. Moreover, based on Guidelines § 15308, "construction activities and relaxation of standards allowing environmental degradation are not included in this exemption." The City's EJ element, as explained in our prior letters, is tied to and will enable major construction activities, and it weakens the standards of environmental justice by providing illusory or misleading policies.

To address our claims of insufficient notice to the public because of not providing the hyperlink to the EJ element draft in the Notice or in the Agenda Package itself, the City justifies that the EJ element draft has been online since April 1, 2020.

The City's cavalier, let-them-use-internet attitude ignores the very real fact, widely known to the general public, that many Inglewood disadvantaged communities may not have computers or, if they do, may be unable to afford internet access. The libraries where they might usually access the internet are closed, making access to both a hard copy of the Draft EJ Element and the online version of it unavailable. The City's assertion also ignores our key claim that the public was provided no *hyperlink* to the draft EJ element and was thus required to search for the EJ Element itself on the City's not user-friendly website. Unaffordability of access to the internet is particularly and painfully true now, when rampant unemployment is making many people choose between food and rent payments. Assuming that all people can afford both a laptop and internet access is arrogant and discriminatory, and impairs or denies the ability to meaningfully

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<sup>4</sup> To the extent the *new* exemptions to both the Land Use and EJ Element approvals were added *after* the Planning Commission heard both cases and made its recommendations on both the respective approvals and their supporting CEQA exemptions, pursuant to the Inglewood Municipal Code, the added exemptions constitute modifications and the City Council may not act on the Planning Commission's prior recommendations, without first sending the cases back to the Planning Commission to consider the added new CEQA exemptions in both cases and issue a new recommendation for any approvals.

participate in the City's decision-making about the projects, and especially the EJ Element for the General Plan.

This conduct on the City's part does not comport with both long-standing and recent legislation defining environmental justice. Assembly Bill 1628 was signed into law by Governor Newsom on September 27, 2019, and took effect this year. The bill's Section 1, subd. (b), provides:

“It is therefore the intent of the Legislature to ensure that the populations and communities disproportionately impacted by pollution *have equitable access to, and can meaningfully contribute to, environmental and land use decisionmaking*, and can enjoy the equitable distribution of environmental benefits.” (Emphasis added.)

Arguing that it provided meaningful participation to the public in the course of the EJ Element drafting, the City actually refutes its own claims by stating:

“The comment states that the EJ Element ignores numerous concerns raised by the public, including danger to cyclists, constrained parking, unsafe buses, and the need for additional police. EJ Element, Appendix A includes the topics of discussion from each focus group and comments made by participants. There is no legal requirement that the City respond to each comment or concern raised during the EJ focus groups. Adoption of the EJ Element is a legislative decision.” (June 9, 2020, Staff Report, p. 13.)

The City denied meaningful participation to the public and ignored public concerns about the lack of parking, rising rents, bus safety, bicycling safety, and instead matched the EJ Element to the lucrative transit-oriented development opportunities favored by major stakeholder developers, including the IBEC. By doing so, the City also ignores the fact that those transit-oriented development policies – i.e., higher density, reduced parking, and reliance on transit – have been recently documented as being one of the main reasons of spreading COVID-19 especially among disadvantaged communities.

The City's EJ Element continues to fail in its mandatory purpose of protecting the health and meaningful participation of disadvantaged communities in Inglewood, and relaxes the EJ standards to allow for more pollution. It does not qualify for any exemption, including the common sense exemption or the newly added regulatory agency exemption.

**IV. CONCLUSION.**

We request that the City Council reject the proposed Land Use Element amendments and Environmental Justice Element as being illegally piecemealed from the IBEC project, and also require staff to provide an accurate Land Use Element description, as well as rewrite the EJ Element to provide genuine safeguards for the Inglewood's disadvantaged population against air pollution and for responsive public involvement and participation in all land use decisions. This request is *in addition to* the requests in our prior letters<sup>5</sup>.

Very truly yours,

*/s/ Robert Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl  
Encls.

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<sup>5</sup> We also incorporate all other public comments, objecting to the General Plan Amendments, including but not limited to the comments attached hereto. (Exh. 9 [Articles re Inglewood's General Plan Amendments.]

To the Inglewood Planning Commission,

6/10/20

My family received your notice today of the public hearing scheduled for June 17, 2020 to consider the matters associated with the IBEC. We were troubled to see that this public event, by definition, was being held in the middle of a pandemic. So many other venues of greater public importance within our city, state and federal government are still closed and/or highly curtailed, yet this “business proposal” rubber stamping between a private corporation and the city must continue at the risk of all the attendees, who may or may not come due to the risk to their personal health. It has a calculated feeling.

My father an architect, city planner and retired LA county commissioner along with myself built the building standing on 3838 W. 102 st. over 30 years ago. Our business and temple were both situated there for decades. We have been part of the Inglewood community and invested there long before it was fashionable. My father is 87 years old an amputee with multiple underlying health issues and by doctors orders has not left his house in months, nor can he while the pandemic continues. He feels strongly about making his case in person as his right.

Our unsolicited experience with Murphy’s Bowl LLC and their agents has not been positive. They have been opportunistic at the least if not deceptive. The city should not give any unfair advantage to a private business just because they have deeper pockets than a smaller business. Our building has been redlined within Murphy’s Bowls plans to expand their business and profits. We are presumed out of the picture, without even asking. How exactly do they plan on building their business over us? This is not a city project, it is a private business trying to build their empire at our expense.

1) Please provide us with the plans on how our building will be incorporated in this project prior to the public hearing so we have reasonable time to review and respond.

2) Please provide contact information for the Mayor of Inglewood, our Councilperson and all others in charge of this project.

Please confirm receipt of this email via reply.

Respectfully,

Dev Bhalla

310-770-9660

[dev@indiaimportsandexports.com](mailto:dev@indiaimportsandexports.com)

Message

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**From:** Evangeline Lane [/O=INGLEWOOD/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=95B9D8DB804945D1AADD60AF8A431286-EVANGELINE LAN]  
**Sent:** 6/11/2020 1:17:21 PM  
**To:** Mindala Wilcox [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b46bfd8a1e12482fb4f973bea21d23c4-Mindala Wilcox]  
**Subject:** Fwd: Public Records Request - Planning Commission Agenda

Hi Mindy,

When the agenda is ready today, do you want me to send her the on-line link in a reply email?

I'll await ypur directions.

E.

Sent from my Sprint Samsung Galaxy Note10.

---

**From:** Melissa Hebert <msmelissahebert@gmail.com>  
**Sent:** Thursday, June 11, 2020 11:15:34 AM  
**To:** Evangeline Lane <elane@cityofinglewood.org>; Aisha Thompson <aphillips@cityofinglewood.org>  
**Cc:** Jacquelyn Gordon <jgordon@cityofinglewood.org>  
**Subject:** Public Records Request - Planning Commission Agenda

Good morning Evangeline & Aisha!

I am seeking a copy of the planning commission agenda for June 17th meeting to approve the Clippers arena?

Melissa

## Message

**From:** Naira Soghatyan [Naira@robertsilversteinlaw.com]  
**Sent:** 6/11/2020 3:20:44 PM  
**To:** Mindala Wilcox [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b46bfd8a1e12482fb4f973bea21d23c4-Mindala Wilcox]; Yvonne Horton [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=112c1fcb52164d5d9721a08db5ba3485-Yvonne Horton]  
**CC:** Robert Silverstein [Robert@robertsilversteinlaw.com]; Veronica Lebron [Veronica@robertsilversteinlaw.com]  
**Subject:** Special Accommodation Advance Request for June 17, 2020 Planning Commission Hearing.

Dear Ms. Horton and Ms. Wilcox:

Please include this communication in the administrative record for the IBEC project.

As we informed you by email on June 9, 2020, despite our properly calling in, waiting on hold, and our repeated attempts to "raise our hand" to make a comment, we were not connected by the City, and were deprived of our statutory right to "address the legislative body" on June 9, 2020 "before or during the legislative body's consideration" of the General Plan Amendments, Agenda Items PH-1 and PH-. Govt. Code Sec. 54954.3(a).

While waiting on the phone, I also noticed that there were many others waiting (at least 6 in the queue, per the phone answering service), who did not have the chance to speak at all or whose comments were not clearly heard or considered by the City Council, either because of technical issues or simply because the City Council denied these intended speakers the right to speak, in violation of the Brown Act. Yet the City Council continued the hearing and voted on the items despite the acknowledged disruptions in public access to the teleconference.

The above-described obstructions were in addition to the City's failure to provide - in advance and in the agenda itself - a *correct* access code. As a result, numerous people who could not watch the City Council hearing on the internet and relied on teleconferencing by phone were unable to learn about the later announced corrected access code and could not participate in the meeting at all. We believe there were more than 100 callers on June 9, 2020 who tried to call and participate in the June 9, 2020 meeting by phone but could not do so because of the incorrect access code provided by the City. This is an improper and disgraceful state of affairs.

Without waiving our objections to the June 9, 2020 meeting's violations of the Brown Act, but in an attempt to avoid any such interference with our and our client's rights, or disruptions to the general public, in connection with the upcoming June 17, 2020 Planning Commission hearing, we hereby request special accommodation to be able to be heard and to comment by telephone in the form of an uninterrupted teleconference opportunity, where we are actually called on to speak.

We request that the City inform us of its commitment to address this issue for us - and generally for the public - or otherwise postpone any Planning Commission or City Council hearings on any land use and/or CEQA decisions, including regarding the IBEC Project and EIR, until and unless the public may participate and comment without exclusion, "technical failures," or other conditions which deny members of the public of their right to participate in and comment at public hearings.

Please confirm what steps the City will take to accommodate our special accommodation request, and our requests generally. Thank you.



Naira Soghatyan, Esq.  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: (626) 449-4200  
Facsimile: (626) 449-4205  
Email: Naira@RobertSilversteinLaw.com  
Website: www.RobertSilversteinLaw.com

=====

The information contained in this electronic mail message is confidential information intended only for the use of the individual or entity named above, and may be privileged. The information herein may also be protected by the Electronic Communications Privacy Act, 18 USC Sections 2510-2521. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone (626-449-4200), and delete the original message. Thank you.

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Message

**From:** Veronica Lebron [Veronica@robertsilversteinlaw.com]  
**Sent:** 6/11/2020 11:35:30 AM  
**To:** Aisha Thompson [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2b82a68431394f299154b97b7cb90f78-Aisha Thompson]; Yvonne Horton [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=112c1fcb52164d5d9721a08db5ba3485-Yvonne Horton]  
**CC:** Esther Kornfeld [Esther@robertsilversteinlaw.com]; Naira Soghatyan [Naira@robertsilversteinlaw.com]; Robert Silverstein [Robert@robertsilversteinlaw.com]  
**Subject:** California Public Records Act Request | IBEC Project SCH No. 2018021056  
**Attachments:** 6-11-20 [SCAN] CPRA Request to City (Horton) re IBEC Project.PDF

Please see attached. Please confirm receipt.

Thank you.

Veronica Lebron  
 The Silverstein Law Firm, APC  
 215 North Marengo Avenue, 3rd Floor  
 Pasadena, CA 91101-1504  
 Telephone: (626) 449-4200  
 Facsimile: (626) 449-4205  
 Email: [Veronica@RobertSilversteinLaw.com](mailto:Veronica@RobertSilversteinLaw.com)  
 Website: [www.RobertSilversteinLaw.com](http://www.RobertSilversteinLaw.com)

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 The information contained in this electronic mail message is confidential information intended only for the use of the individual or entity named above, and may be privileged. The information herein may also be protected by the Electronic Communications Privacy Act, 18 USC Sections 2510-2521. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone (626-449-4200), and delete the original message. Thank you.

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**THE SILVERSTEIN LAW FIRM**

*A Professional Corporation*

215 NORTH MARENGO AVENUE, 3RD FLOOR  
PASADENA, CALIFORNIA 91101-1504

PHONE: (626) 449-4200 FAX: (626) 449-4205

ROBERT@ROBERTSILVERSTEINLAW.COM  
WWW.ROBERTSILVERSTEINLAW.COM

June 11, 2020

**VIA EMAIL [yhorton@cityofinglewood.org](mailto:yhorton@cityofinglewood.org);**  
**[aphillips@cityofinglewood.org](mailto:aphillips@cityofinglewood.org)**

Yvonne Horton, City Clerk  
City Clerk's Office  
1 Manchester Boulevard  
Inglewood, CA 90301

Re: California Public Records Act Requests re IBEC Project,  
State Clearinghouse No. 2018021056.

Dear Ms. Horton:

This request is made under the California Public Records Act pursuant to Government Code § 6250, et seq. Please provide copies of the following from the City (as "City" is defined below).

**Please also include this correspondence in the running administrative record for the IBEC Project.**

For ease of reference in this document, please refer to the following **defined terms**:

The "City" shall refer to the City of Inglewood, its City Council, the Mayor and all members of the City Council, all members, officials, employees, consultants, and agents of the City commissions, boards, offices, departments, divisions, the City Attorney's office and any and all outside counsel retained by the City, for your respective office, division, or Department.

"Project" shall refer to State Clearinghouse No. 2018021056, "IBEC Project," "Inglewood Basketball and Entertainment Center Project," "Murphy's Bowl," or "Clippers Arena," or APNs or Project Addresses, as listed below:

APN 4032-001-005: 10022 S. Prairie Ave., Inglewood, CA 90303

APN 4032-001-035: 3900 W. Century Blvd., Inglewood, CA 90303  
APN 4032-001-039: 10004 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-001-048: 3915 W. 102nd St., Inglewood, CA 90303  
APN 4032-001-049: 3940 W. Century Blvd., Inglewood, CA 90303  
APN 4032-001-902: 3901 W. 102nd St., Inglewood, CA 90303  
APN 4032-001-903: 3939 W. 102nd St., Inglewood, CA 90303  
APN 4032-001-904: 10116 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-001-905: 3947 W. 102nd St., Inglewood, CA 90303  
APN 4032-001-906: 10020 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-001-907: 10112 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-001-908: 10108 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-001-909: 3941 W. 102nd St., Inglewood, CA 90303  
APN 4032-001-910: 10104 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-001-911: 3921 W. 102nd St., Inglewood, CA 90303  
APN 4032-001-912: 3922 W. Century Blvd., Inglewood, CA 90303  
APN 4032-001-913: 3930 W. Century Blvd., Inglewood, CA 90303  
APN 4032-002-913: 3822 W. Century Blvd., Inglewood, CA 90303  
APN 4032-002-914: 3831 W. 102nd St., Inglewood, CA 90303  
APN 4032-002-915: 3843 W. 102nd St., Inglewood, CA 90303  
APN 4032-002-916: 3851 W. 102nd St., Inglewood, CA 90303  
APN 4032-002-917: 3821 W. 102nd St., Inglewood, CA 90303  
APN 4032-003-914: 3700 W. Century Blvd., Inglewood, CA 90303

APN 4032-003-915: 3703 W. 102nd St., Inglewood, CA 90303  
APN 4032-007-035: 3838 W. 102nd St., Inglewood, CA 90303  
APN 4032-007-900: 3818 W. 102nd St., Inglewood, CA 90303  
APN 4032-007-901: 3836 W. 102nd St., Inglewood, CA 90303  
APN 4032-007-902: 3844 W. 102nd St., Inglewood, CA 90303  
APN 4032-007-903: 3832 W. 102nd St., Inglewood, CA 90303  
APN 4032-007-904: 3812 W. 102nd St., Los Angeles, CA 90303  
APN 4032-007-905: 3850 W. 102nd St., Inglewood, CA 90303  
APN 4032-008-001: 10200 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-008-002: 10204 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-008-006: 10226 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-008-035: 10212 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-008-900: 3910 W. 102nd St., Inglewood, CA 90303  
APN 4032-008-901: 3926 W. 102nd St., Inglewood, CA 90303  
APN 4032-008-902: 3900 W. 102nd St., Inglewood, CA 90303  
APN 4032-008-903: 10220 S. Prairie Ave., Inglewood, CA 90303  
APN 4032-008-904: 3930 W. 102nd St., Inglewood, CA 90303  
APN 4032-008-905: 3920 W. 102nd St., Inglewood, CA 90303  
APN 4032-008-907: 3940 W. 102nd St., Inglewood, CA 90303  
APN 4032-008-908: 3936 W. 102nd St., Inglewood, CA 90303  
APN 4034-004-027: 4000 W. Century Blvd., Inglewood, CA 90304  
APN 4034-004-900: 4045 W. 101st St., Inglewood, CA 90304

APN 4034-004-901: 4037 W. 101st St., Inglewood, CA 90304  
APN 4034-004-902: 4019 W. 101st St., Inglewood, CA 90304  
APN 4034-004-903: 4039 W. 101st St., Inglewood, CA 90304  
APN 4034-004-904: 4015 W. 101st St., Inglewood, CA 90304  
APN 4034-004-905: 4040 W. Century Blvd., Inglewood, CA 90304  
APN 4034-004-906: 4043 W. 101st St., Inglewood, CA 90304  
APN 4034-004-907: 4046 W. Century Blvd., Inglewood, CA 90304  
APN 4034-004-908: 4042 W. Century Blvd., Inglewood, CA 90304  
APN 4034-004-909: 4032 W. Century Blvd., Inglewood, CA 90304  
APN 4034-004-910: 4036 W. Century Blvd., Inglewood, CA 90304  
APN 4034-004-911: 4033 W. 101st St., Inglewood, CA 90304  
APN 4034-004-912: 4020 W. Century Blvd., Inglewood, CA 90304  
APN 4034-004-913: 4026 W. Century Blvd., Inglewood, CA 90304  
APN 4034-005-900: 10117 S. Prairie Ave., Inglewood, CA 90303  
APN 4034-005-901: 4030 W. 101st St., Inglewood, CA 90304  
APN 4034-005-902: 4043 W. 102nd St., Inglewood, CA 90304  
APN 4034-005-903: 4037 W. 102nd St., Inglewood, CA 90304  
APN 4034-005-904: 4031 W. 102nd St., Inglewood, CA 90304  
APN 4034-005-905: 4018 W. 101st St., Inglewood, CA 90304  
APN 4034-005-906: 4023 W. 102nd St., Inglewood, CA 90304  
APN 4034-005-907: 4025 W. 102nd St., Inglewood, CA 90304  
APN 4034-005-908: 4019 W. 102nd St., Inglewood, CA 90304

APN 4034-005-909: 4036 W. 101st St., Inglewood, CA 90304

APN 4034-005-910: 4044 W. 101st St., Inglewood, CA 90304

APN 4034-005-911: 4026 W. 101st St., Inglewood, CA 90304

APN 4034-005-912: 4022 W. 101st St., Inglewood, CA 90304

APN 4032-001-006: address n/a (vacant land)

APN 4032-001-033: address n/a (vacant land)

APN 4032-001-900: address n/a (vacant land)

APN 4032-001-901: address n/a (vacant land)

APN 4032-003-912: address n/a (vacant land)

APN 4032-004-913: address n/a (multi-family residential)

APN 4032-004-914: address n/a (multi-family residential)

APN 4032-008-034: address n/a (vacant land).

“Project Applicant” shall refer to Murphy’s Bowl, LLC or Steve Ballmer, and their officers, principles, employees, representatives, agents, attorneys, experts and consultants.

“Email” includes, but is not limited to, correspondence to or from any email account through which any City business is being conducted, including but not limited to email accounts assigned by the City’s Information Technology Agency to City officials, employees or consultants, and consistent with City of San Jose v. Superior Court of Santa Clara County, each and every personal email account outside the City’s email system upon which any City business has been conducted.

“Text messages” includes, but is not limited to, correspondence to or from any communications device of the City or a City official, employee or consultant’s personal communications device over which text messages may have been sent or received and stored which are City business.

“Meeting Notes” includes, but is not limited to any personal handwritten or electronic notes maintained by any City employee, contractor, or agent, regardless of the ownership of the media.

“Exchanged between” shall mean the passing of a document from one person to another by any means of transmission or delivery.

“Document,” as defined in Govt. Code § 6252(g), shall mean any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail, message texting or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.

Please note that Documents and Emails includes, but is not limited to, correspondence to or from any email account through which any public business is conducted, including but not limited to **personal or otherwise private email accounts belonging to government officials, employees or consultants**, pursuant to the California Supreme Court’s recent decision in City of San Jose v. Superior Court (2017) 2 Cal.5th 608. This also includes text messages on any public or private device on which discussions about the Project and other public matters was discussed. **Please ensure that you have secured and produced all such personal or otherwise private emails and texts.** Therefore, we are also requesting that all relevant officials, employees and agents **preserve intact under a litigation hold** all such “personal” and official emails and text messages, and not to destroy, delete, allow to be automatically purged, or otherwise to engage in or permit spoliation of such evidence. To the extent that such emails or texts have been deleted, purged or otherwise spoliated, we demand that the holders of these devices immediately be informed that they must take all efforts to retrieve any deleted or otherwise purged emails and texts, and make all efforts to retrieve and preserve them. **Please confirm that you will do so.**

The public records requests include:

- (1) All documents that refer or relate to historic oil well operations on any portion of the Project site (defined above), including but not limited to contamination issues, properly or improperly capped or abandoned oil wells, and any and all communications that refer or relate thereto, including



but not limited to with Division of Oil, Gas, and Geothermal Resources (“DOGGR”) and California Geological Energy Management (“CalGEM”).

- (2) All documents that refer or relate to hazardous wastes generation, hauling, disposal, recognized environmental conditions (REC), remedial actions, cleanups, contamination, No Further Action letters, Underground Storage Tanks and/or leaks at the Project site and within ½-mile radius of any point of the Project site, including but not limited to communications with the Department of Toxic Substances Control (“DTSC”).
- (3) All documents from January 1, 2016 through the date of your response to this request that refer or relate to or are communications with the Inglewood Unified School District concerning the Project, including but not limited to communications with the City, Project Applicant, ESA (preparer of the Project EIR) and other environmental consultants, their agents, attorneys, experts, and representatives.
- (4) All documents that refer or relate to methane zone or methane buffer zone, methane testing or methane leaks at the Project site and within a 1000-foot radius thereof.
- (5) All documents that are, refer, or relate to Phase I, Phase II, or any supplemental Environmental Site Assessment or soil testing of any and all lots within the Project site.
- (6) All daily calendars of meetings of the Mayor and Councilmembers, and City Manager, from January 1, 2016 through the date of your response to this request.
- (7) All documents that are, refer or relate to communications about the potential use of eminent domain for or in furtherance of the Project, including but not limited to all such documents between, among and/or including the City on the one hand, and the Project Applicant [as defined above] on the other hand, from January 1, 2016 through the date of your response to this request. Please note that Citizens for Ceres holds that communications between the City and the Applicant, and/or their respective counsel, are not privileged and must be produced. Citizens for Ceres v. Superior Court (2013) 217 Cal.App.4th 889, 922. Accordingly, you may

not withhold any documents exchanged between, to/from or including the City and the Project Applicant.<sup>1</sup>

- (8) All documents that are, refer or relate to communications about vacant and or cleared land within the Project site and their acquisition by the City, from January 1, 2015 through the date of your response to this request.
- (9) All documents that are, refer or relate to communications about Federal Aviation Administration (FAA) noise mitigation grant, conditions and requirements for the grant, and any of the Project sites that the City purchased with the FAA grant funds.
- (10) All documents that are, refer or relate to communications about noise reduction projects and funding therefor within a ½-mile radius of the Project site, from January 1, 2016 through the date of your response to this request.
- (11) All documents, from January 1, 2020 through the date of your response to this request, that are, refer, or relate to communications with Metro, CalDOT, Caltrans, and LA Public Works, including but not limited to issues related to the Crenshaw Line operation, metro stations, timelines and delays in their construction, grade separation activities, and shuttle services and/or bus/shuttle schedules to/from the Project site.
- (12) All documents, from January 1, 2017 through the date of your response to this request that are, refer, or relate to CA Public Records Act requests and/or FOIA requests, and responses and document productions in response thereto, related to the IBEC Project and/or Murphy's Bowl, filed or requested by or on behalf of MSG (and all affiliated persons and entities), IRATE, or any other person or entity, as well as all records responsive to any outstanding CPRA requests to the City that were otherwise

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<sup>1</sup> This principle and admonition applies to ALL documents and communications between the City, as broadly defined above, and the Applicant, as broadly defined above. No pre-Project-approval documents to, from, between, among, or including them may be withheld. This applies to all of the requests contained in this letter.

Please confirm that you are not withholding or redacting any such documents and/or communications, or parts of such documents and/or communications.

resolved/ended pursuant to the Settlement Agreement authorized by the City Council on March 24, 2020 during the closed-door session.

- (13) All documents, contracts, communications about or with or including Overland, Pacific and Cutler related to the IBEC project.
- (14) All documents (and communications) from January 1, 2019 through the date of your response to this request, that are, refer, or relate to documents or records that were flagged or requested to be removed from the administrative record by any person or entity. Confidential information  
Confidential information  
Confidential information and further all documents that were actually removed from the draft/running administrative record.
- (15) All documents and communications that refer or relate to the City's practices and procedures regarding the editing of the recordings, including audio and video, of City Council and other City government hearings or meetings.
- (16) All documents and communications that refer or relate to the editing of video- and/or audio-recordings of the City Council and other administrative hearings related to the IBEC Project, including but not limited to the recording of the March 24, 2020 City Council hearing.
- (17) All documents – in their unredacted form – that were ordered sealed in MSG Forum, LLC v. City of Inglewood, et al., Case No. YC072715, as well as all other documents that were sealed, including the discovery referee's reports.
- (18) All documents from January 1, 2016 through the date of your compliance with this request which refer, relate to, or are any communications exchanged between or including any member of the City Planning Department, including but not limited to the planner(s) assigned to this Project, and any principal, owner, employee, agent, consultant or attorney representing Murphy's Bowl, LLC or ESA (or any entity linked to the IBEC Project), including but not limited to any and all staff reports, including drafts and documents in Planner "working files," "screen check EIR documents and drafts, studies, photographs, memoranda and internal

memoranda, agenda items, agenda statements, correspondence, emails, attachments to emails, notes, photos, and audio and/or video recordings.

- (19) All documents from January 1, 2016 through the date of your compliance with this request, that are not currently posted online in the draft/running administrative record, which refer or relate to the Project, including but not limited to any and all staff reports, including drafts and documents in Planner “working files,” studies, photographs, memoranda and internal memoranda, agenda items, agenda statements, correspondence, emails, attachments to emails, notes, photos, and audio and/or video recordings.
- (20) All objection and/or comment letters, emails and other communications through the date of your compliance with this request, that are not currently posted online in the draft/running administrative record, regarding the Draft Environmental Impact Report for the Inglewood Basketball and Entertainment Center (IBEC) project at any time, including but not limited to all objection and/or comment letters, emails or other communications related to or in response to any and all Notices of Preparation and any other preliminary CEQA documents for the Inglewood Basketball and Entertainment Center (IBEC) project.
- (21) All documents from January 1, 2016 through the date of your compliance with this request that (i) are, refer or relate to, and/or that (ii) are communications with, between, among and/or including the City on the one hand, and the Project Applicant [as defined above], including ESA (the IBEC EIR preparer) on the other hand, which refer or relate to:
  - (a) The Project;
  - (b) The Project Draft EIR and Final EIR;
  - (c) The Project’s land use applications and review;
  - (d) The Forum, Madison Square Garden, MSG Forum, LLC, and any of their officers, owners, members, principals, attorneys, agents, or representatives;
  - (e) Kenneth or Dawn Baines, and/or Let’s Have a Cart Party, and/or

- (f) 10212 S. Prairie Ave., Inglewood;
- (g) APN No. 4032-008-035;
- (h) Robert Silverstein or The Silverstein Law Firm;
- (i) Latham & Watkins, including but not limited to Benjamin Hanelin and Maria Pilar Hoyer;
- (j) Chatten, Brown & Carstens, including but not limited to Douglas Carstens;
- (k) Nielsen, Merksamer, Parrinello, Gross & Leoni, including but not limited to Arthur G. Scotland, Sean P. Welch, Kurt R. Oneto, Hilary J. Gibson;
- (l) Document(s) the Mayor signed on March 24, 2020,, including but not limited to the tri-party and/or settlement agreements (signed versions), as well as staff reports, communications, internal and external memo, correspondence and other documents that refer or relate to said settlement agreement;
- (m) Federal Aviation Administration noise mitigation grant, conditions and requirements for the grant, and documents related to the City's purchase of any lots included in the Project with that grant;
- (n) Capitol building annex project, annex project related work, or the state office building project, environmental leadership development project, or leadership project;
- (o) Requests for extension of public comment period due to the COVID 19 situation; communications re publishing of the notice of extension or its circulation;
- (p) All unredacted versions of letters or text messages, which are redacted in the public record, including but not limited to those dated March 24, 2020 and thereafter;

- (q) Leases or any types of agreements between the Project Applicant and the City, including exclusive negotiating agreements and their amendments;
  - (r) Amendments to the General Plan, including but not limited to amendments to the Land Use, Circulation, Safety Elements and adoption of the Environmental Justice Element, as well as the Project's inconsistency with the General Plan;
  - (s) Amendments to the Inglewood International Business Park Specific Plan, including but not limited to the exclusion of Project parcels from the Specific Plan, the Project's inconsistency with the Specific Plan, and the Specific Plan itself.
- (22) All documents that are, refer or relate to communications about the Billboard Project, Case No. EA-MND-2019 or its MND, its Applicant WOW Media, Inc., PlaceWorks environmental document preparer, their representatives, IBEC Project Applicant, their agents, officers, attorneys, from January 1, 2016 through the date of your compliance with this request. The requested records include records about any and all approvals, notices of approvals or determination, as well as records about the lots on which the billboard signs are proposed to be installed and communications about vacating any of those lots or City/public right of way and including those in or part of the IBEC Project.
- (23) The administrative record (AR) certified by the City and lodged in the Case of Inglewood Residents Against Takings and Evictions v. Successor Agency To The Inglewood Redevelopment Agency, et al., LASC Case No. BS174709.

Please produce all responsive documents to each item in the same organization as listed above.

I draw your attention to Government Code § 6253.1, which requires a public agency to assist the public in making a focused and effective request by: (1) identifying records and information responsive to the request; (2) describing the information technology and physical location of the records; and (3) providing suggestions for overcoming any practical basis for denying access to the records or information sought.

If you determine that any information is exempt from disclosure, I ask that you reconsider that determination in view of Proposition 59 which amended the State Constitution to require that all exemptions be “narrowly construed.” Proposition 59 may modify or overturn authorities on which the City has relied in the past.

If you determine that any requested records are subject to a still-valid exemption, I request that you exercise its discretion to disclose some or all of the records notwithstanding the exemption and with respect to records containing both exempt and non-exempt content, you redact the exempt content and disclose the rest. Should you deny any part of this request, you are required to provide a written response describing the legal authority on which you rely.

Please be advised that Government Code § 6253(c) states in pertinent part that the agency “shall promptly notify the person making the request of the determination **and the reasons therefore.**” (Emphasis added.) Section 6253(d) further states that nothing in this chapter “shall be construed to permit an agency to delay or obstruct the inspection or copying of public records. The **notification of denial** of any request for records required by Section 6255 shall set forth the names and titles or positions of each person responsible for the denial.”

Additionally, Government Code § 6255(a) states that the “agency shall justify withholding any record by demonstrating that the record in question is exempt under expressed provisions of this chapter or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.” (Emphasis added.) This provision makes clear that the agency is required to justify withholding any record **with particularity as to “the record in question.”** (Emphasis added.)

Please clearly state in writing pursuant to Section 6255(b): (1) if the City is withholding any documents; (2) if the City is redacting any documents; (3) what documents the City is so withholding and/or redacting; and (4) the alleged legal bases for withholding and/or redacting as to the particular documents. It should also be noted that to the extent documents are being withheld, should those documents also contain material that is not subject to any applicable exemption to disclosure, then the disclosable portions of the documents must be segregated and produced.

Govt. Code § 6253.9(a) requires that the agency provide documents in their native format, when requested. Pursuant to that code section, please also provide the requested documents, including all applications, in their electronic format (i.e., pdf soft copies).

**I further request that no IBEC Project approvals or EIR certification occur until we have been provided all records responsive to our CPRA requests herein, as well as to our prior CPRA requests on April 22 (to Public Works) and April 23, 2020 (re minutes and notes of the closed session), June 4, 2020 (March 24, 2020 hearing video/audio recordings and all signed documents) and on June 8, 2020 (re redevelopment plan issues) **with sufficient advance time** to review the produced records.**

If the documents exist in electronic form, we ask that you provide copies on a disk or flashdrive at cost. For any non-electronic documents, if the copy costs for those documents do not exceed \$500, please make the copies and bill this office. If the copy costs exceed \$500, please promptly contact us in advance to arrange a time and place where we can inspect the records.

As required by Government Code § 6253, please respond to this request within ten days. Because we are emailing this request on June 11, 2020, please ensure that your response is provided to us by no later than **June 21, 2020**. Thank you.

Very truly yours,

*/s/ Robert Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl  
Encls.



**Note to Reader:**

**All Exhibits attached to this letter are a part of  
the Administrative Record and can be found at  
[ibecproject.com](http://ibecproject.com)**

**EXHIBIT 1**

**From:** [Veronica Lebron](#)  
**To:** [Jacquelyn Gordon](#); [Mindala Wilcox](#); [Yvonne Horton](#)  
**Cc:** [Esther Kornfeld](#); [Naira Soghatyan](#); [Robert Silverstein](#)  
**Subject:** Follow-up California Public Records Act Request  
**Date:** Thursday, June 11, 2020 8:32:07 PM

---

Dear Ms. Horton and Ms. Wilcox:

As a further follow up to our further Public Records Act request of earlier today, in addition to the ordinance and redevelopment plan we have been requesting, please provide us with [Ordinance No. 2045](#) on July 7, 1981, approving and adopting the Redevelopment Plan for the century Redevelopment Project and adopted [Ordinance No. 93-18](#) on June 29, 1993, approving and adopting the first amendment to the Redevelopment Plan.

Thank you.

Veronica Lebron  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: [\(626\) 449-4200](tel:(626)449-4200)  
Facsimile: [\(626\) 449-4205](tel:(626)449-4205)  
Email: [Veronica@RobertSilversteinLaw.com](mailto:Veronica@RobertSilversteinLaw.com)  
Website: [www.RobertSilversteinLaw.com](http://www.RobertSilversteinLaw.com)

=====  
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>>>

**From:** Jacquelyn Gordon <[jgordon@cityofinglewood.org](mailto:jgordon@cityofinglewood.org)>  
**To:** "Veronica@robertsilversteinlaw.com"  
<[Veronica@robertsilversteinlaw.com](mailto:Veronica@robertsilversteinlaw.com)>  
**CC:** Yvonne Horton <[yhorton@cityofinglewood.org](mailto:yhorton@cityofinglewood.org)>  
**Date:** 6/11/2020 3:33 PM

**Subject:** RE: California Public Records Act Request | Ordinance 94-24

>

Hello Veronica,

Mrs. Horton asked me to forward a copy of Ordinance 94-24.

Best regards,

*Jacquelyn Gordon*

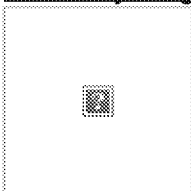
Staff Assistant: City of Inglewood

City Clerk's Office

One Manchester Boulevard, 1<sup>st</sup> Floor, Inglewood, CA 90301

Phone 310 412.8809 Fax 310 412.5533

[www.CityofInglewood.org](http://www.CityofInglewood.org)



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**From:** Yvonne Horton

**Sent:** Thursday, June 11, 2020 3:17 PM

**To:** Jacquelyn Gordon <jgordon@cityofinglewood.org>

**Subject:** Fw: California Public Records Act Request | Ordinance 94-24

---

**From:** Veronica Lebron <[Veronica@robertsilversteinlaw.com](mailto:Veronica@robertsilversteinlaw.com)>

**Sent:** Thursday, June 11, 2020 7:30 AM

**To:** Aisha Thompson; Mindala Wilcox; Yvonne Horton

**Cc:** Esther Kornfeld; Naira Soghatyan; Robert Silverstein

**Subject:** RE: California Public Records Act Request | Ordinance 94-24

Dear Ms. Horton:

We searched the Municipal Code for Ordinance 94-24 with no results. There was a link for an Ordinance List, but that also did not contain results for 94-24.

Please promptly provide a direct link to the ordinance. Thank you.

Please include our emails on this subject in the IBEC administrative record.

Veronica Lebron  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: (626) 449-4200  
Facsimile: (626) 449-4205  
Email: [Veronica@RobertSilversteinLaw.com](mailto:Veronica@RobertSilversteinLaw.com)  
Website: [www.RobertSilversteinLaw.com](http://www.RobertSilversteinLaw.com)

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**From:** Yvonne Horton <[yhorton@cityofinglewood.org](mailto:yhorton@cityofinglewood.org)>  
**To:** Veronica Lebron <[Veronica@robertsilversteinlaw.com](mailto:Veronica@robertsilversteinlaw.com)>  
**Date:** 6/10/2020 1:57 PM  
**Subject:** RE: California Public Records Act Request

Hello Ms. Lebron,

I have forward your request to the department who would have the documents you are looking for. As for the ordinance 94-24 this can be found on the Cities Website under municipal code.

---

**From:** Veronica Lebron [<mailto:Veronica@robertsilversteinlaw.com>]  
**Sent:** Monday, June 08, 2020 7:30 PM  
**To:** Yvonne Horton  
**Cc:** Esther Kornfeld; Naira Soghatyan; Robert Silverstein  
**Subject:** California Public Records Act Request

Dear Ms. Horton:

Please ensure that this communication is included in the administrative record for the IBEC Project matter (SCH [2018021056](#)).

This is a public records request pursuant to Govt. Code Sec. 6250 et seq.

Please provide:

- 1) Ordinance No. 94-24;
- 2) All redevelopment plan(s) and map(s) for the Century Redevelopment Project and Merged Inglewood Redevelopment Project, as well as all CEQA approval documents (including but not limited to EIRs) for the adoption of the redevelopment plan(s)

If these documents are available online, provide a link.

Govt. Code § 6253.9(a) requires that the agency provide documents in their native format, when requested. Pursuant to that code section, please also provide the requested records in their native and electronic format.

We do not expect that the City will have unusual circumstances to produce the few requested public records.

Because I am emailing this request on June 8, 2020, please ensure that your response is provided to me by no later than **June 18, 2020**. Please confirm receipt. Thank you.

Veronica Lebron  
 The Silverstein Law Firm, APC  
 215 North Marengo Avenue, 3rd Floor  
 Pasadena, CA 91101-1504  
 Telephone: (626) 449-4200  
 Facsimile: (626) 449-4205  
 Email: [Veronica@RobertSilversteinLaw.com](mailto:Veronica@RobertSilversteinLaw.com)  
 Website: [www.RobertSilversteinLaw.com](http://www.RobertSilversteinLaw.com)

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One California Plaza  
37th Floor  
300 South Grand Avenue  
Los Angeles, California  
90071-3147

June 15, 2020

PHONE: (213) 620-0460  
FAX: (213) 624-4840  
DIRECT: (213) 621-0815  
E-MAIL: kbrogan@hillfarrer.com  
WEBSITE: www.hillfarrer.com

Via E-mail (ibecproject@cityofinglewood.org)

Hon. Chair and Members of the Planning  
Commission  
City of Inglewood  
One West Manchester Blvd., 4<sup>th</sup> Floor  
Inglewood, CA 90301

Re: **Public Hearing re Inglewood Basketball and Entertainment Center  
June 17, 2020**

Ladies and Gentlemen:

This firm represents the Michino family which owns 3915 W. 102<sup>nd</sup> Street, bearing Assessor's Parcel Number 4032-001-048. The owners object to the adoption of the proposed General Plan Amendment redesignating their parcel from Commercial to Industrial, object to the redefinition of the scope of industrial uses to include sports and entertainment facilities, object to the proposed vacation of streets, and to the zoning code amendments and changes. It appears these changes are a precursor to the City attempting to take private property from the owners for a private use by Murphy's Bowl and its affiliates. Please make this letter part of the public record.

Very truly yours,

*Kevin Brogan (digital signature)*

KEVIN H. BROGAN  
OF  
HILL, FARRER & BURRILL L

# NRDC

June 15, 2020

Mindy Wilcox, AICP, Planning Manager  
City of Inglewood, Planning Division  
One West Manchester Boulevard, 4th Floor  
Inglewood, A 90301  
Ibecproject@cityofinglewood.org

Re: Comments on the Draft Environmental Impact Report for the Inglewood  
Basketball and Entertainment Center (IBEC), SCH 2018021056

Dear Ms. Wilcox:

This is a brief comment on the City of Inglewood's responses to my March 24, 2020 comment letter on the Clippers arena project.

One argument in my March 24 letter focused on the differences in the GHG analysis between the AAB 900 certification application and the DEIR. One of the City's responses is that the AB 900 process requires a fixed baseline – the time of the NOP – but the EIR used a baseline that was adjusted annually.

An annually adjusted baseline is improper under CEQA in the circumstances of this case. The standard rule is that, as CARB realized, the CEQA baseline is the actual condition on the ground at the time of the NOP. CEQA Guidelines Section 15125 provides:

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

Although less than clear, what the City's comment response appears to contemplate is use of a future baseline as emission standards and the like are tightened. In doing so, the project attempts to take credit for circumstances that it has nothing to do with, and that would occur whether the project is ever built or not – such as tightened auto GHG emission standards over time. Indeed, even if those standards are tightened, building

# NRDC

the project will make emissions worse than they otherwise would be because of increased VMT directly attributable to the project.

In *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority*, 57 Cal.4<sup>th</sup> 439 (2013), the California Supreme Court evaluated use of a future baseline in an EIR for the Expo Line light rail project. The agency used a baseline for air quality that projected traffic fifteen years into the future, based on projections from SCAG. The court upheld that baseline in the case before it, explaining that a future baseline for traffic may be permissible where an agency can show that an analysis based on the usual standard would tend to be “misleading or without informational value” and is “justified by unusual aspects of the project or the surrounding conditions.”

There is nothing unusual about the Clippers project that would validate departure from the standard rule about CEQA baselines. It is a large stationary project, not a rail line or other transportation project. A baseline as of the date of the NOP is easy to calculate. Whether cars are, or are not, more efficient in the future does not change the fact that the project will draw many tens of thousands of new vehicle trips into the area. The EMFAC program can easily account for changes in emissions factors over time and the program’s results can be directly compared with the pre-project baseline. Thus, the special circumstances described in the *Neighbors For Smart Rail* case do not exist here.

The reason that developers like using a future baseline is that it makes the increase in emissions look smaller and so mitigation will be less costly. That is not sufficient reason to bend the law in favor of the Clippers project.

Finally, I would like to draw your attention to the June 12, 2020 decision of the California Court of Appeal, 4<sup>th</sup> Appellate District, in *Golden Door Properties v. County of San Diego*, available at 2020 WL 3119041. The Court’s opinion rejects the County’s attempt to short-circuit GHG mitigation by using standardless GHG offset protocols, even if sold by an agency certified by CARB. Based on the *Golden Door* opinion, the City needs to take another look at the Clippers project’s offsite mitigation proposals and make sure that they are each additional and enforceable – which San Diego’s were not.





Thank you for your consideration of this letter.

Yours truly,

David Pettit  
Senior Attorney  
Natural Resources Defense Council

**NATURAL RESOURCES DEFENSE COUNCIL**

1314 2ND STREET | SANTA MONICA, CA | 90401 | T 310.434.2300 | F 310.434.2399 | NRDC.ORG

**From:** [Naira Soghatyan](#)  
**To:** [Aisha Thompson](#); [Mindala Wilcox](#); [Yvonne Horton](#)  
**Cc:** [Esther Kornfeld](#); [Robert Silverstein](#); [Veronica Lebron](#)  
**Subject:** Brown Act Violation on June 9, 2020; Comments to June 16, 2020 CC Agenda Item Nos. SPH-2 and SPH-3; and Objection to June 16, 2020 CC Agenda Item No. O-1  
**Date:** Tuesday, June 16, 2020 2:41:38 PM  
**Attachments:** [June 9 2020 City Council Hearing FB Comments.pdf](#)

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Dear Mayor, City Council and City officials

Please include this letter in the administrative record of the IBEC Project SCH SCH 2018021056.

This letter is in response to the City's communication we received yesterday, June 15, 2020, June 16, 2020 City Council Hearing Agenda items SPH-2 and SPH-3 that the June 15, 2020 relates to, as well as an objection to the June 16, 2020 City Council Hearing Agenda Item O-1 related to the Adoption of the Citywide Permit Parking Districts Program and related Ordinance.

## **1. Deprivation of Public Right to Address Decisionmakers under Govt. Code Sections 54954(b)(3) and 54954.3**

It is a fact that the Agenda of June 9, 2020 had provided an incorrect access code, which was the only way the public could directly address the decisionmakers, distinct from their right to also contact the City in writing. It is also a fact that we and the public attempted to contact the City at the incorrect access code provided on the agenda. The City violated the Brown Act's requirements to provide a correct advance agenda notice of the access code, as well as to provide uninterrupted and reasonable opportunity for the public to contact the City even upon the late correction access code, in violation of Govt. Code Sections 54954(b)(3) and 54954.3. These statutory requirements are also consistent with the COVID-19 Executive Order N-29-20, which solely waives the physical presence requirements and yet mandates both notice and accessibility of all public meetings.

In view of our and others' failed attempts to address the decisionmakers on June 9, 2020, we have requested special assurances and special accommodations to ensure that we and the public can be heard and can exercise our statutory right under the Brown Act at both June 17, 2020 Planning Commission Hearing and at any other public meeting. Our statements that over 100 people were deprived of the opportunity to address the decisionmakers on June 9, 2020 are supported by over 100 comments people left on Facebook in real time - during the very June 9, 2020 meeting - asking for an opportunity to speak and complaining of the technical difficulties to hear others' speeches.

**Attached hereto** is a printout of all the real time correspondence by the public, as well as the City's acknowledgment of the problem during the June 9, 2020 meeting. The list of comments arguably does not include the people who had attempted to call and yet were unable to view the meeting on Facebook either to learn about the corrected code or to leave comments on Facebook - all due to the lack of access to

computer/internet or lack of computer skills.

We also note that for those who had been calling the City on June 9, 2020 - even with the City's late-corrected access code - were still deprived of the opportunity to speak because the instructions given at the meeting to dial # and then again # "to raise your hand" to make a comment were incorrect, as the "raise your hand" command given on the phone was "#2.". The incorrect instructions with the dial code were provided by staff orally during the hearing and were provided in writing on Facebook in real-time communications from the City.

We and the public request assurances and special accommodations to ensure that the City's teleconferencing is supported by an advance agenda, with a correct telephone and access code, printed in the same large print as the rest of the agenda, and free of any interruptions, background or static noises or other technical disturbances.

## **2. Re-Consideration of SPH-2 and SPH-3 and Recirculation of the IBEC DEIR.**

In view of the undisputed technical problems with teleconferencing and the City's Brown Act violations to provide due notice and accessibility to the June 9, 2020 meetings, we support the reconsideration of the items upon accurate timely notice of the new hearing provided for the consideration of the General Plan Amendments in Items SPH-2 and SPH-3.

We also reiterate our claim that the General Plan Amendments will further the IBEC Project, are part of the latter, and must be considered in the IBEC Project EIR and together with all IBEC Project approvals.

The General Plan amendments were proposed on April 1, 2020, when Notices of Exemption for both General Plan amendments were posted online. This was long after March 24, 2020, when the public review period for the IBEC DEIR closed. Since no analysis of the later-advanced General Plan amendments of density/intensity modifications in the Land Use element and new Environmental Justice element (and their impacts) occurred in the IBEC DEIR, the noted General Plan amendments constitute a significant change and mandate that the DEIR be recirculated to provide the respective analysis under CEQA Guidelines Sec. 15088.5(a).

We therefore request not only the reconsideration of the General Plan amendments to ensure proper public participation, but also the recirculation of the IBEC Project DEIR, to include the analysis of the General Plan Amendments and their impacts therein.

## **3. Objections to the Adoption of the Ordinance re Citywide Permit Parking Districts Program, Agenda Item No. O-1.**

We object to the City's adoption of the Ordinance re Citywide Permit Parking Districts Program as it is in violation of CEQA's piecemealing prohibition.

The proposal to introduce citywide parking district changes was brought up after the IBEC DEIR public comment period closed on March 24, 2020. The language of the Ordinance itself mentions that the Ordinance and the proposed changes are

interrelated with the IBEC Project and are to address the parking issues associated with the foreseeable events upon the implementation and operation of the IBEC Project. Yet, the IBEC DEIR does not mention the sweeping citywide parking regulation changes, which will significantly limit public right to park on residential streets. To the contrary, the IBEC DEIR claimed that the Project would reduce traffic by 15% due to the Project's proximity to Metro and shuttle services.

We therefore object to the City's adoption of the Citywide Permit Parking Districts Program and the associated Ordinance under Agenda Item No. O-1 because of piecemealing from the IBEC Project, and request that the analysis of the impacts of the parking ordinance be included in the IBEC Project DEIR. We also request that the IBEC Project DEIR be recirculated under CEQA Guidelines Sec. 15088.5(a), to address the significant change related to the changes in the parking regulations to further the IBEC Project.

Thank you. .

Naira Soghatyan, Esq.  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: (626) 449-4200  
Facsimile: (626) 449-4205  
Email: Naira@RobertSilversteinLaw.com  
Website: www.RobertSilversteinLaw.com

=====

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**From:** [Naira Soghatyan](#)  
**To:** [Mindala Wilcox](#); [Yvonne Horton](#)  
**Cc:** [Robert Silverstein](#); [Veronica Lebron](#)  
**Subject:** Request for Clarification and Decision/Documents re June 16, 2020 CC Agenda Item Nos. SPH-2 and SPH-3.  
**Date:** Tuesday, June 16, 2020 7:24:19 PM

---

Dear Ms. Horton and Ms. Wilcox:

Please include this letter in the administrative record of the IBEC Project (SCH 2018021056).

I have watched the relatively short City Council hearing on June 16, 2020.

I heard staff requesting that the PH-1 and PH-2 items (General Plan amendments) - which were considered and approved on June 9, 2020 - "be rescinded" and reconsidered as "new items" on June 30, 2020. However, I did not see any motion or vote taken on the staff's request to rescind, beyond the Mayor's own single statement that Items SPH-2 and SPH-3 re General Plan Amendments will be set for a hearing on June 30, 2020.

Please forward us any official decision/document regarding Item Nos. SPH-2 and/or SPH-3, if any, including but not limited to Council action(s) taken on those items and anything indicating whether the General Plan amendments and respective CEQA exemptions approved on June 9, 2020 were indeed rescinded, as staff recommended.

Thank you.

Naira Soghatyan, Esq.  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: [\(626\) 449-4200](tel:(626)449-4200)  
Facsimile: [\(626\) 449-4205](tel:(626)449-4205)  
Email: [Naira@RobertSilversteinLaw.com](mailto:Naira@RobertSilversteinLaw.com)  
Website: [www.RobertSilversteinLaw.com](http://www.RobertSilversteinLaw.com)

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**From:** [Esther Kornfeld](#)  
**To:** [Aisha Thompson](#); [Christopher E. Jackson](#); [Fred Jackson](#); [ibecproject](#); [Mindala Wilcox](#); [vhorton@cityofinglewood.org](#)  
**Cc:** [Alex Padilla](#); [atrejo@cityofinglewood.org](#); [drice@cityofinglewood.org](#); [Eloy Morales Jr.](#); [George Dotson](#); [James Butts](#); [Ken Campos](#); [isprings@cityofinglewood.org](#); [Patricia G. Patrick](#); [Ralph Franklin](#); [Terry LeRoy Coleman](#); [bgridlev@kbbllaw.com](#); [rki@kbbllaw.com](#); [Naira Soghbatyan](#); [Robert Silverstein](#); [Veronica Lebron](#)  
**Subject:** Objections re IBEC DEIR & FEIR (SCH 2018021056) and entitlements  
**Date:** Tuesday, June 16, 2020 12:41:04 PM

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Dear Ms. Wilcox and City Officials:

Please see below link to our objection letter + exhibits submitted on behalf of Kenneth and Dawn Baines, owners of 10212 S. Prairie Ave., Inglewood, in connection with the June 17, 2020 Planning Commission hearing.

As with all of our communications, please ensure that our objection letter + exhibits as contained in this link are included in the administrative record for this matter.

<https://www.dropbox.com/s/zwosu7hi33k6569/6-16-20%20Objections%20to%20IBEC%20Project%20DEIR%20%26%20FEIR%3B%20SCH%20No.%202018021056.pdf?dl=0>

We are submitting these comments a day and a half prior to the Planning Commission hearing to assist you in printing out and distributing hard copies for the Planning Commissioners and other officials.

As always, please contact us with any questions. Thank you.

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June 16, 2020

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Yvonne Horton, City Clerk  
City Clerk's Office on behalf of  
Inglewood Planning Commission  
Mayor and City Council  
Inglewood Successor Agency, Inglewood Housing  
Authority, Inglewood Parking Authority, Joint  
Powers Authority  
1 Manchester Boulevard  
Inglewood, CA 90301

- Re: (1) **Objections to IBEC Project, DEIR and FEIR;**  
**State Clearinghouse No. 2018021056;**
- (2) City's failure to respond to Public Records Act requests;
- (3) Interference with proper administrative record;
- (4) City's fast-tracking of Project and improper notice;
- (5) The City's FEIR responses to comments are improper and inadequate;

- (6) Additional objections to DEIR and FEIR, including based on new information post-March 24, 2020;
- (7) Piecemealing and illegal piecemeal adoption of Project components in violation of CEQA and State Planning and Zoning Laws;
- (8) Illegal precommitment;
- (9) Failure adequately to discuss impacts on schools;
- (10) Illegal Mitigation Monitoring and Reporting Program;
- (11) Illegal statement of overriding considerations;
- (12) Illegal specific plan amendments;
- (13) Violation of Subdivision Map Act;
- (14) Violation of Surplus Land Law;
- (15) Illegal Disposition and Development Agreement.

Dear Mayor, City Council, Ms. Horton, Ms. Wilcox and Mr. Jackson:

**I. INTRODUCTION.**

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Prairie Ave., Inglewood. Please keep this office on the list of interested persons to receive timely advance notice of all hearings and determinations related to the City's actions and potential approvals related to the IBEC/Clippers Arena project ("Project") and any of its components, including but not limited to general plan amendments, eminent domain actions and resolutions of necessity, noise insulation projects, road improvement projects, street or alley vacation determinations, specific plan amendments, the Media WOW billboard project at Prairie and Century and its MND, the Inglewood Transit Connector project, and any environmental determinations and/or CEQA exemptions.

The request for the above advance notice is pursuant to all applicable laws, including but not limited to Pub. Res. Code § 21167(f).



This letter consists of several distinct objections, but all related to the Project.<sup>1</sup>

**II. THE CITY HAS VIOLATED THE PUBLIC RECORDS ACT, PREJUDICING OUR ABILITY TO FULLY PARTICIPATE.**

As a preliminary issue, while the administrative process and environmental review of the Project has been pending, we have made several Public Records Act (“CPRA”) requests and have sought various documents related to the Project. Despite the specificity of our requests, the City has not responded to any of our requests, with the exception of one related to the documents exchanged or produced during the open and closed sessions on March 24, 2020, in response to which the City has provided incomplete and *unsigned* and/or signed but *undated* documents, among other deficiencies in that single, limited production

The City’s failures to respond to our CPRA requests dated April 22, April 23, and May 28, 2020, as well as unreasonable improper invocation of claimed privileges or exemptions, places the City in violation of the California Public Records Act and has deprived us of being able to fully participate in meaningfully understanding and responding to the City and applicant Murphy’s Bowl or Clippers’ (sometimes “Applicant”) contemplated actions.

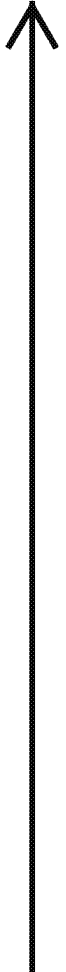
Attached collectively at **Exhibit 1** hereto are true and correct copies of correspondence regarding this matter as well as copies of currently-outstanding CPRA requests, to which the City has failed to provide responsive documents, to our prejudice. (**Exh. 1** [CPRA requests to City (April 22, 23, May 8, June 4, 11, and 12, 2020).] Because these documents have not been produced, the City has hampered our ability to exhaust administrative remedies and object, and impaired our ability to submit the most meaningful and comprehensive evidence possible.

The California Supreme Court has stated: “Implicit in the democratic process is the notion that government should be accountable for its actions. In order to verify

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<sup>1</sup> These objections are provided under protest. Our client objects to the entire special CEQA scheme for the IBEC Project under AB 987, which is unconstitutional and illegal per se. Our client submits these objections while simultaneously asserting that AB 987 is illegal and unconstitutional, and as a result, that the process by which the City and Applicant are proceeding as to CEQA approvals and all approvals for the Project that depend on the City’s finding of CEQA compliance are improper, invalid, and *void ab initio*. Our client expressly reserves all rights and remedies in connection therewith.





accountability, individuals must have access to government files. Such access permits checks against the arbitrary exercise of official power and secrecy in the political process . . . .” CBS, Inc. v. Block (1986) 42 Cal.3d 646, 651. Those precepts apply to the City’s actions herein.

As stated by the Supreme Court in Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal.4th 1112, CEQA’s “purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR protects not only the environment but also informed self-government. To this end, public participation is an essential part of the CEQA process.” Id. at 1123 (italics in original).

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It has been held that “the whole purpose of the CPRA is to shed public light on the activities of our governmental entities . . . .” Fairley v. Superior Court (1998) 66 Cal.App.4th 1414, 1422.

Because the documents requested from the City relate to critical issues concerning the Project, its EIR, and the City’s impending approvals of same, we ask that **no decision** be made until the requested documents have been produced to us. If necessary, we will seek to augment the administrative record to remedy the violations of our client’s and the public’s constitutional and due process rights to a fair and impartial hearing, among other violations committed by the City.

**III. INTERFERENCE WITH THE ADMINISTRATIVE RECORD HAS ALSO PREJUDICED MEANINGFUL PUBLIC REVIEW.**

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<sup>2</sup> Our firm downloaded the document at 9 p.m. on Friday, May 15, 2020, shortly after the Agenda was made available to the public. However, as of May 19, 2020 the hyperlink in the Council agenda was disabled and the page was unavailable. (Exh. 3 [May 19, 2020 agenda and printout of the notice of the unavailable page].)

However, CEQA requires the decision makers and the public – and consequently the Court – to make a decision on the Project or on CEQA compliance in light of the entire record, rather than a record that is favorable to the Project Applicant or proponents.

“The ‘in light of the whole record’ language means that the court reviewing the agency’s decision cannot just isolate the evidence supporting the findings and call it a day, thereby disregarding other relevant evidence in the record. (*Bixby v. Pierno* (1971) 4 Cal.3d 130, 149 [93 Cal.Rptr. 234, 481 P.2d 242].) Rather, the court must consider all relevant evidence, including evidence detracting from the decision, a task which involves some weighing to fairly estimate the worth of the evidence. (*County of San Diego v. Assessment Appeals Bd. No. 2* (1983) 148 Cal.App.3d 548 [195 Cal.Rptr. 895].)” Lucas Valley Homeowners Assn. v. County of Marin (1991) 233 Cal.App.3d 130, 141-142.

The administrative record mandated by CEQA under Pub. Res. Code § 21167.6(e) and applicable to AB 987 projects under Pub. Res. Code § 21189.52(j) is broad and expansive. “First, the language is mandatory – *all* items described in the enumerated categories *shall* be included in the administrative record.” Madera Oversight Coalition, Inc. v. County of Madera (2011) 199 Cal.App.4th 48, 63 (ital. orig.). “When an agency prepares and certifies the administrative record, it exercises no discretion and employs no specialized expertise; it performs a ministerial task when it applies the mandatory language of section 21167.6, subdivision (e).” Madera at 64.

“Recently in [Madera], we made several observations about the contents of the administrative record as defined by these provisions. First, the language is mandatory: The administrative record shall include the listed items. Second, the list is non-exclusive; the administrative record’s contents include, but are not limited to, the listed items. Next, the administrative record as defined is very expansive. We quoted language that originated in one Court of Appeal case and was subsequently quoted in another: Section 21167.6 ‘contemplates that the administrative record will include pretty much everything that ever came near a proposed development or to the agency’s compliance with CEQA in responding to that development.’” Citizens for Ceres v. Superior Court (2013) 217 Cal.App.4th 889, 909-910. See also, County of Orange v. Superior Court (2003) 113 Cal.App.4th 1, 8, cited with approval by Eureka



Citizens for Responsible Government v. City of Eureka (2007) 147 Cal.App.4th 357, 366-367.

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the public and other agencies have been deprived of the opportunity to review the entire administrative record as mandated by CEQA and to comment on the DEIR. Thus our client and the public have been deprived of a full and fair opportunity to comment on the Project and its impacts in light of the whole of the record. All objections are expressly reserved.

**IV. THE CITY'S FAST-TRACKING OF THE PROJECT DURING THE COVID-19 PANDEMIC AND FAILURE TO CIRCULATE THE IBEC DEIR NOTICE OF EXTENSION OF THE PUBLIC COMMENT PERIOD FURTHER IMPAIRED PUBLIC COMMENT.**

The public review period of the IBEC DEIR coincided with the turmoil of the COVID-19 pandemic, when the public and public/responsible/trustee agencies were fighting for human lives. Because of that timing, the scheduled 2020 Olympic games were cancelled and postponed for one year.<sup>3,4</sup> California's leaders have suggested similar postponing of large scale events until 2021. (Exh. 4 [article re halting sports events until 2021].) Yet Inglewood chose to fast-track the IBEC sports arena Project.

On March 13, 2020, when an extension was requested from the City and granted, the City *delayed* posting its notice of extension to the *public* and failed to circulate it properly.<sup>5</sup> Although the extension was provided on March 13, 2020 and for only a few days until March 24, 2020, it was posted on the County website only on March 18, 2020,

<sup>3</sup> See <https://www.olympic.org/tokyo-2020>

<sup>4</sup> We specifically request that all the hyperlinks in this letter be downloaded and printed out, submitted to the agency, and be included in the City's control file and administrative record for the Project.

<sup>5</sup> Culver City – a city immediately adjacent to Inglewood and to be directly impacted by the Project – had specifically requested a further extension of the public comment period beyond March 24, 2020, due to COVID-19 pandemic. The administrative record does not reflect that Culver City's request was granted. (Exh 5. [Culver City Request].)

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which lost 5 days of circulation. (Exh. 6 [extension notice on County website].) As for the State Clearinghouse’s website, no official “notice” was posted there; only a short memo dated March 16, 2020, with attached email correspondence dated March 13, 2020 appeared. (Exh. 7 [memo, March 16, 2020].) The City should not delegate its CEQA notice posting duties to the State Clearinghouse and should have provided proper and timely notice to the public, including to our client, which the City did not do. Furthermore, per the State Clearinghouse’s memo, the notice was addressed to “all reviewing agencies” – not the public at large.

The City specifically made the decision not to publish the notice of extension. (Exh. 8 [City correspondence to not publish the notice].)

Thus, the only way the public could have been timely informed of the extension was by continuously checking the City’s website or County and State Clearinghouse websites on a daily basis. That is not adequate notice to the public. This is even more so in view of the Governor’s safer-at-home order on March 19, 2020. (Exh. 9 [Safer-at-Home Orders and Restrictions].)<sup>6</sup>

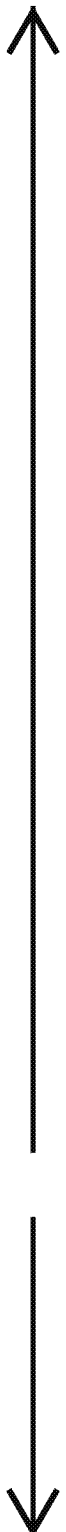
Per the Notice, the public comment period was extended to March 24, 2020 at 5 p.m. The City Council meeting on March 24, 2020 began at 2 p.m., i.e. slightly prior to the close of the public comment period. Had the public been duly apprised of the extended public comment period, the public – and our clients – could and would have made comments at the March 24, 2020 Council meeting. The City’s lack of proper notice of the extension of the public comment period impaired public comment and opportunity to address the City Council on the DEIR.

The City’s failure to duly notice was also in violation of Pub. Res. Code § 21092 and Inglewood Municipal Code noticing requirements, which require timely circulation and publishing of CEQA notices, especially related to DEIRs.

**V. THE CITY’S FEIR RESPONSES TO COMMENTS TO THE DEIR ARE UNAVAILING AND NOT MADE IN GOOD FAITH.**

We further object that the FEIR’s so-called responses to comments fail adequately to provide meaningful, good faith responses to comments, including but not limited to the comments sent by sister governmental agencies, by the NRDC related to GHG violations, and by other objectors like the Forum and IRATE, including but not limited to objections

<sup>6</sup> See at <https://covid19.ca.gov/stay-home-except-for-essential-needs/>



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about the illegal precommitment to the project in violation of CEQA by the City's entering into the Exclusive Negotiating Agreements ("ENA") (**Exh. 10** [we incorporate by reference all such arguments, including piecemealing arguments, as contained in the briefs attached collectively hereto]) and other documents demonstrating that the impending approvals were a *post hoc* rationalization for decisions already made.

The responses to comments also fail to show a good faith effort at full disclosure of the Project's environmental impacts, and how they will be mitigated, including in violation of Guidelines Section 15151. For example, as to impacts to the system of roadways and the State Highway system as raised in comments by Caltrans, the FEIR's ostensible mitigation measures are improper, inadequate and unenforceable, including because they do not guarantee feasibility of such mitigation and solely add funds to Caltrans' existing CM project addressing the *baseline* traffic impacts *without* the IBEC Project:

"As mitigation for the significant cumulative impacts on the I-405 freeway, based on further consultations with Caltrans, the following mitigation measure is added to the Draft EIR following Mitigation Measure 3.14-24(g) on page 3.14-294:

**Mitigation Measure 3.14-24(h)**

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

Payment of fair share impact fees by a developer is not proper mitigation measures unless those "mitigation measures require the City to undertake an action"; i.e., to "prepare" the fair share plans and unless the City provides that those are feasible and not speculative, i.e., provide an estimate of the cost to prepare the fair share plans, if any, and the estimate of how much the mitigation measures themselves in those plans will cost or how they will be implemented." California Clean Energy Committee v. City of Woodland (2014) 225 Cal.App.4th 173, 197. Moreover, although Caltrans' CM project is aimed to reduce traffic impacts and was studied, if at all, to address the existing baseline traffic, it was not targeted to reduce the IBEC project impacts and any amendment to it may have its own impacts on the environment, which have not been accounted for.



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The above noted response adds to the uncertainties already present in the case, whereby – according to the Project’s AB 987 Application (p. 18) – “[t]he operational life of the IBEC Project is assumed to be 30 years and operational emissions were estimated from July 1, 2024 (the anticipated beginning of operations) through 2054. Operational emission sources include on-road motor vehicles (mobile), energy (electricity and natural gas), water and wastewater, solid waste, area, and stationary (emergency generators).”<sup>7</sup>

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The response to comments and MMRP also fail adequately to demonstrate that the so-called mitigation imposed will be carried out or is feasible, including as to objections regarding GHG emissions, as raised by others in this process. Mitigation is required by CEQA to be fully enforceable, and to be carried out. Guidelines § 15126.4(a)(2); Lincoln Place Tenants Assn. v. City of Los Angeles (2005) 130 Cal.App.4th 1491, 1508. The FEIR and MMRP also improperly defers mitigation in violation of CEQA. The FEIR should not be certified, and the DEIR should be recirculated for proper disclosure, analysis and mitigation of all impacts.

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**VI. COMMENTS/OBJECTIONS TO THE PROJET DEIR BASED ON NEW INFORMATION RELEASED BY THE CITY AND/OR NEW INFORMATION THAT WAS NOT REASONABLY KNOWN DURING THE OFFICIAL PUBLIC COMMENT PERIOD MUST BE RESPONDED TO.**

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We incorporate by reference all prior objections to the Project, including but not limited to objections/comments to the Project in the administrative record, or that should have been in the administrative record, dated *prior* to the public comment period beginning on December 27, 2019 and objections to AB 987 certification. Since AB 987 certification documents do not appear in the administrative record, we are providing those as an exhibit hereto. (Exh. 11 [AB 987 comment letters].) Each objection to the Project raised therein must be responded to by the City as part of a recirculated DEIR and process.

Moreover, pursuant to Pub. Res. Code Section 21189.55(d), the lead agency must still consider new information:

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<sup>7</sup> See [https://opr.ca.gov/ceqa/docs/ab900/20190104-AB900\\_IBEC\\_Application.pdf](https://opr.ca.gov/ceqa/docs/ab900/20190104-AB900_IBEC_Application.pdf)



- “(d) The lead agency need not consider written comments submitted after the close of the public comment period, **unless** those comments address any of the following:
- (1) **New issues** raised in the response to comments by the lead agency.
  - (2) **New information** released by the public agency **subsequent to the release** of the draft environmental impact report, such as new information set forth or embodied in a staff report, proposed permit, proposed resolution, ordinance, or similar documents.
  - (3) **Changes** made to the project **after the close** of the public comment period.
  - (4) Proposed conditions for approval, **mitigation measures**, or proposed findings required by Section 21081 or a proposed reporting and monitoring program required by paragraph (1) of subdivision (a) of Section 21081.6 , where the lead agency releases those documents **subsequent to the release** of the draft environmental impact report.
  - (5) **New information** that was not reasonably known and could not have been reasonably known during the public comment period.” (Emph. added.)

The comments below are based on such “new information” that came to light after March 24, 2020.

**A. The COVID-19 Crisis Mandates Re-evaluation of Mitigation Measures in the DEIR and AB-987 Certification, as well as Significant Impacts from Those Measures.**

The comment below is based on new information of health and safety concerns regarding the proposed mitigation measures of alternate modes of transportation. Pub. Res. Code § 21189.55(d)(4)-(5).



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CEQA requires a mandatory finding of significance where “(4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.” Guidelines § 15065(a)(4). CEQA also requires agencies to consider the environmental impacts of the mitigation measures that are proposed for the project.

The COVID-19 crisis brought to light significant impacts related to the proposed mitigation measures of promoting the use of mass public transit, walking and bicycling, especially in crowded places and dense city centers, which were not reasonably known or could not have been comprehended or documented before March 25, 2020.

The Project’s DEIR and AB-987 certification and their findings, including the GHG emission impacts and their alleged reduction, largely rely on the *assumption* of vast use of public transit, walking, and bicycling, to achieve 50% GHG reduction, as claimed.

However, the Project assumptions or even the enforceability of the proposed mitigation measures have not been supported by any substantial evidence and are even more attenuated now, in view of the pandemic. First, there are no statistics or studies to support the assumption that reduced parking or more bus lines will make people use buses, walk or ride bicycles. Metro ridership has been steadily declining in all major cities where public transit measures were improved and transit-oriented development (“TOD”) policies were introduced. (Exh. 12 [article re Metro ridership in major cities].)<sup>8</sup> Second, the COVID-19 crisis revealed the flipside of the proposed mitigation measures: there is now a documented correlation between public transit and the spread of diseases, including life-threatening ones, such as COVID-19. (Exh. 13 [NY articles and study by MIT].)<sup>9</sup> Many cities have acknowledged this threat. (Exh. 14 [articles re Carson City’s request to Metro to stop service; deaths of Metro employees, NY Post; Article re NY Mayor Admitting to Transit Danger].)<sup>10</sup>

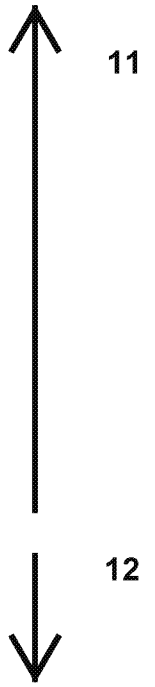
<sup>8</sup> See [https://www.washingtonpost.com/local/trafficandcommuting/falling-transit-ridership-poses-an-emergency-for-cities-experts-fear/2018/03/20/ffb67c28-2865-11e8-874b-d517e912f125\\_story.html](https://www.washingtonpost.com/local/trafficandcommuting/falling-transit-ridership-poses-an-emergency-for-cities-experts-fear/2018/03/20/ffb67c28-2865-11e8-874b-d517e912f125_story.html)

<sup>9</sup> <https://www.nytimes.com/2020/03/23/nyregion/coronavirus-nyc-crowds-density.html>; <https://nypost.com/2020/04/15/mit-study-subways-a-major-disseminator-of-coronavirus-in-nyc/>;  
[http://web.mit.edu/jeffrey/harris/HarrisJE\\_WP2\\_COVID19\\_NYC\\_24-Apr-2020.pdf](http://web.mit.edu/jeffrey/harris/HarrisJE_WP2_COVID19_NYC_24-Apr-2020.pdf)

<sup>10</sup> See <https://www.dailybreeze.com/2020/04/05/carson-calls-on-metro-to-stop-service-after-bus-driver-tests-positive-for-coronavirus/>;

Third, the COVID-19 reality and the need for social distancing suggests that public reliance on and acceptance of public transit as a desirable and practical means of transportation will permanently change. (Exh. 15 [article re potential permanent shifts; Federalist article re resilience; MTA cleaning protocol gaps].)<sup>11</sup> Dr. Anthony Fauci, Chief of Laboratory on Immunoregulation, opined that this pandemic may become seasonal.<sup>12</sup> (Exh. 16 [article re Fauci statement re seasonal nature of virus].) Measures to make Metro ridership safe were not working as planned.<sup>13</sup> (Exh. 17 [article re ineffective metro cleanups].) It is an absolute imperative – to avoid exposure to health and safety hazards from COVID-19 as well as other identified and *unidentified* viruses and bacteria – that people have a safer choice to get to their destinations rather than be forced to use mass transit, walk or ride a bike in crowded or dense places, especially on narrow sidewalks such as those that the Project proposes. (Exh. 18 [density article].)<sup>14</sup>

Finally, the Project and EIR’s assumptions that mass transit is indeed ecologically “green” in general is itself based on false or now infeasible assumptions.<sup>15</sup> (Exh. 19



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<https://www.politico.com/states/new-york/albany/story/2020/04/22/with-death-toll-hitting-83-the-mta-contemplates-a-memorial-for-its-covid-fallen-1279032> ;  
<https://nypost.com/2020/04/16/de-blasio-claims-he-said-early-on-to-avoid-nyc-mass-transit/>

<sup>11</sup> See <https://www.forbes.com/sites/rudysalo/2020/03/31/five-ways-covid-19-may-impact-the-future-of-infrastructure-and-transportation/> ;  
<https://thefederalist.com/2020/04/22/how-public-transit-makes-the-nation-more-vulnerable-to-disasters-like-covid-19/> ; <https://nypost.com/2020/05/04/mta-workers-cleaning-around-the-homeless-on-nyc-subways/>

<sup>12</sup> <https://www.businessinsider.com/fauci-coronavirus-is-likely-seasonal-after-global-outbreaks-2020-4>

<sup>13</sup> <https://thecity.nyc/2020/03/mta-bus-and-subway-pandemic-preparations-not-working-union.html>

<sup>14</sup> See <https://californiaglobe.com/section-2/coronavirus-spread-in-high-density-cities-halting-proposed-more-density-housing-measures/>

<sup>15</sup> See the analysis of flawed assumptions behind allegedly “green” mass transit, as reported by Tom Rubin, the Controller-Treasurer of the Southern California Rapid

[article re analysis of bus transit].) Thus, pursuant to an analysis by Tom Rubin, author of numerous research reports on transit issues, the conclusion that mass transit is ecologically green was made based on the assumption of 70 people per bus and off the road. Even if this statistic were theoretically possible, the current rules of social distancing run counter to such crowded buses and will require more buses and more frequencies to accommodate the same 70-people/bus count. This will in turn amount to more GHG emissions and air pollution than assumed, and at the same time expose people to viruses.

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In sum, COVID-19 demonstrated the dangers and health/safety hazards of mass transit or higher concentration of density at the Project site and radically affects the Project's baseline traffic and pedestrian safety assumptions and, derivatively, their impacts analyses and mitigation measures.

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The DEIR and the Project's feasibility must be reevaluated in light of changed circumstances that have come about in the last approximately two months, including related to the EIR's now-demonstrably faulty assumptions and proposed transit-oriented mitigation measures for traffic and GHG impacts.

**B. The DEIR Lacks An Adequate Project Description.**

CEQA requires that the project description in the EIR be "accurate, stable and finite," to enable meaningful evaluation of Project impacts and informed decision-making and public comment as to Project impacts, mitigation, or approval in general. The DEIR leaves numerous Project elements – other than the sports arena itself – undefined and unspecified. For example, it does not specify the impacts or details about the hotel,<sup>16</sup> beyond mentioning that it will have up to 150 rooms; e.g., will it also have restaurants, bars, cafés, outdoor and indoor gathering areas and event space, pools, open to patrons or to the public in general?

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Transit District from 1989 until 1993, who has written many research reports on transit issues. <https://reason.org/commentary/does-bus-transit-reduce-greenhouse/>

<sup>16</sup> The Project's building of a hotel on the City lots acquired with the FAA is also illegal as violating the FAA grant conditions according to which no residential structure may be built on those lots. (Exh. 20 [email confirming the hotel lots were purchased with FAA grant].) Hotels are treated as residential structures in Inglewood.

Further, as evidenced by the Applicant’s May 7, 2020 (long after the March 24, 2020 closing of the public comment period) draft of the Sports and Entertainment Center (“SEC”) “overlay zone” description, there are numerous land uses covered in the Project, yet not disclosed or evaluated in the DEIR.<sup>17</sup> (Exh. 21 [Applicant’s Overlay Zone draft].) The DEIR itself (at p. 2-89) failed to list the land uses in the overlay zone, beyond mentioning the height and setbacks and other *design* characteristics only.

For example, per the Applicant’s draft, the proposed SEC overlay zone will include “Other non-Arena uses that support the Arena and are located in the Event Center Structure,” which suggest daily and potentially 24-hour activity (bars, restaurants), where:

- (C) “Event Center Supporting Structures and Uses” shall mean any of the following uses located within the boundaries of the SE Overlay Zone but not within the Event Center structure:
  - (1) Retail uses, including, but not limited to, the sale or rental of products or services;
  - (2) Dining uses, including **restaurants, bars, cafes, catering services, and outdoor eating areas, including the sale of food and drink for consumption on-site or off-site and the sale of alcoholic beverages for consumption onsite;**
  - (3) Community-serving uses for cultural, exhibition, recreational, or social purposes.” (Id. p. 2; *emph. added.*)

Further, the Overlay Zone contains events expressly held “outside” the Arena:

- “(D) “Infrastructure and Ancillary Structures and Uses” shall mean any uses or structures, temporary or permanent, that are accessory to, reasonably related to, or maintained in connection with the operation and conduct of an Event Center Structure and Use or Event Center Supporting Structure and Use, including, without limitation, open space and plazas,

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<sup>17</sup> See the Applicant’s proposed overlay zone description at [http://ibecproject.com/IBECEIR\\_031906.pdf](http://ibecproject.com/IBECEIR_031906.pdf)



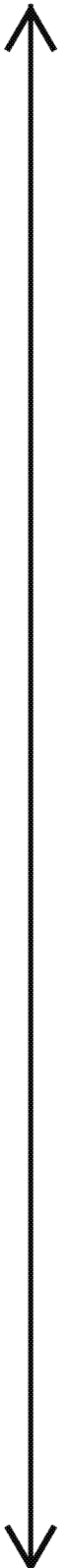
pedestrian walkways and bridges, transportation and circulation facilities, public or private parking facilities (surface, subsurface, or structured), signage, outdoor theaters, broadcast, filming, recording, transmission, production and communications facilities and equipment, and events **held outside of the Event Center Structure** that include, but are not limited to, sporting events, concerts, entertainment events, exhibitions, conventions, conferences, meetings, **banquets, civic and community events, social, recreation, or leisure events**, celebrations, and other similar events or activities.” (Emph. added.)

The Overlay Zone also contains “any other” uses to be determined by the City:

- “(E) “Sports and Entertainment Complex” shall mean a development that includes the following:
  - (1) **Event Center Structure and Uses;**
  - (2) **Event Center Supporting Structures and Uses;**
  - (3) **Infrastructure and Ancillary Structures and Uses;**  
and
  - (4) **Any other uses** that the Economic and Community Development Department Director (“Director”) **determines** are similar, related, or accessory to the aforementioned uses.” (Id. at p. 3, emph. added.)

These uses are all undefined and left to future identification. That is a wholesale violation of CEQA because this situation violates the required “accurate, stable and finite project description.” These multiple and various uses, and their potential interaction with one another and other Project uses, have not been properly disclosed, analyzed or mitigated in the DEIR. They must be as part of a recirculated DEIR.

We emphasize, as the Court of Appeal recently held in Stopthemillenniumhollywood.com v. City of Los Angeles (2019) 39 Cal.App.5th 1, 16, where similar Design Guidelines were invalidated:



“The requirement of an accurate, stable, and finite project description as the *sine qua non* of an informative and legally sufficient EIR has been reiterated in a number of cases since County of Inyo. (See, e.g., Treasure Island, *supra*, 227 Cal.App.4th at p. 1052, 174 Cal.Rptr.3d 363 [“This court is among the many which have recognized that a project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading”]; Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70, 85–89, 108 Cal.Rptr.3d 478 [EIR failed as an informal document because the project description was inconsistent and obscure as to the true purpose and scope of the project]; San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 653, 57 Cal.Rptr.3d 663 [an EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider 309 meaningfully the issues raised by the proposed project].)” *Id.* at 17.

““Only through an accurate view of the project may affected outsiders and public decision makers balance the proposal’s benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal . . . and weigh other alternatives in the balance.’ [Citation.]” *Id.* at 18-19.

Finally, for the Applicability of the Overlay Zone, the Applicant’s draft provides: “Except as otherwise provided in this Article and/or in the SEC Development Guidelines, the provisions of the Inglewood Municipal Code, Chapter 12, Planning and Zoning, shall apply. This Article and the **SEC Development Guidelines shall prevail** in the event of a conflict with other provisions of Chapter 12.” (*Id.* at p. 4, *emph. added.*) Similarly, the draft provides: “(B) The SEC **Design Guidelines** establish specific design and review standards for the development of a Sports and Entertainment Complex within the SE Overlay Zone, including, without limitation, **standards for buildings and structures**, landscaping, signage, and lighting, and shall apply **in lieu of any contrary provisions** in the Inglewood Municipal Code, including without limitation the Site Plan Review process contained in Article 18.1 of this Chapter.” (*Id.* at p. 7.) The draft also overrides setbacks, height and parking requirements in the Code, **provides for only the Planning Department Director’s approval, i.e., with no further CEQA review**, and specifically states that any “lot line adjustments” will be “ministerial” actions; i.e., not subject to CEQA and public review.



This clearly runs afoul of CEQA. As recently explained in Stoepthemillenniumhollywood.com, *supra*, at p. 14, where the Court of Appeal affirmed the trial court's invalidation of the project EIR and all project approvals there, under quite similar facts, including the power of the Planning Director to make future approvals with no further CEQA review:

“Additionally, the trial court held that the conceptual approach used to define the project in this case impermissibly deferred a portion of the environmental impacts analysis. It noted that without knowing which of the project “concepts” would ultimately be built, the EIR could not (and did not) explain how the developers would avoid exceeding the maximum impacts when the project was finally designed and built. Moreover, the LUEP allowed Millennium to transfer or change uses within the project, and it allowed the planning director to approve a change request if the request demonstrated that it was consistent with the maximum allowable number of increased vehicle trips (trip captures) and did not exceed the maximum environmental impacts identified in the EIR. The trial court asked, “But how will the Planning Director make that determination for changing the Project and using what criteria?” It noted that since no additional CEQA review was required to ensure that Millennium was within maximum environmental standards, and no public input would be allowed, the final EIR essentially “defers the environmental assessment of the Project and ultimately fails to ensure that the finally designated Project will not be approved without all necessary mitigations of environmental harm.”“

The Overlay Zone and the EIR do not pass CEQA muster regarding the critical and foundational accurate, stable and finite project description. As that fails, everything else fails with it. Accordingly, it is impossible to evaluate the Project's impacts – the whole of the action – in view of the ancillary uses, such as hotel, restaurants, cafes, retail uses, many of which are not currently identified or, apparently, even known. However, the gamut of potential uses suggests daily 24-hour activity, with the potential for generating much more traffic and/or activity and attendant impacts (noise, need for public services, such as police, utilities, GHG emissions) than discussed in the DEIR. The Project description is fatally flawed, and the FEIR and Project cannot be approved.

**C. Crenshaw Line Construction Delays and the DEIR's False Baseline Assumptions; the Project's Potential Inability to Meet the AB-987 Certification Threshold.**

The DEIR is based on unrealistic baseline assumptions. Per the DEIR, the environmentally superior alternative is Alternative 3 for several reasons, one of which is the Project's proximity to Metro's Crenshaw Line and the provision of shuttle services from the respective stations to the Project site. (DEIR, pp. S-51-52; pdf. 71-72). For that purpose, the DEIR relies on the fact that the Crenshaw line – which will have 3 stations in Inglewood – is slated to start operation in 2019. (DEIR, p. 2-4; pdf. p. 144.)

Yet, it was only after the DEIR comment period closed that Metro admitted that the Crenshaw line's construction will be delayed by 2 years, in view of recently discovered construction defects necessitating a redo; a planned grade separation will further delay that process. (Exh. 22 [LA Times article re Crenshaw Line, April 10, 2020; Streetsblog article, May 20, 2020].)<sup>18</sup> Inglewood and the Project will be directly impacted by these delays. In turn, those dramatically changed circumstances that undermine the EIR's assumptions require recirculation of the DEIR. Based on the article, Mayor Butts did not respond with comment about these delays. Neither did Los Angeles Mayor Garcetti. (Id.)

Moreover, as cautioned by Metro in its DEIR comment to the City on March 24, 2020, the K-line (also known as Crenshaw Line) grade separation activities may coincide with construction of the IBEC Project and thereby present "operational limitations" by not being able to provide the level of service to the arena that is contemplated. (Metro Comment Letter, p. 3.) Metro's delays with the Crenshaw Line and grade separation activities by themselves will adversely impact the traffic in Inglewood.

The fact that Crenshaw Line construction, grade separation, and Project construction activities will coincide significantly also affects the DEIR's *cumulative* impacts analysis and adds more *construction* impacts than contemplated in the DEIR. Delays in construction activities translate into operational limitations (i.e., failure to serve the Project site as contemplated under AB 987 and the EIR). The cumulative operational and construction impacts, in turn, will result in more traffic, air pollution, and GHG

<sup>18</sup> See <https://www.latimes.com/california/story/2020-04-10/metro-crenshaw-lax-line-opening-date-delayed>; <https://la.streetsblog.org/2020/05/20/metro-pursuing-disruptive-centinela-grade-separation-on-nearly-complete-crenshaw-line/>



emissions than contemplated in the DEIR. All of this needs to be disclosed, analyzed and mitigated in a recirculated DEIR.

The DEIR needs to be amended to account for corrected baseline assumption changes, impacts and mitigation measures, and recirculated for comment to other public agencies like Metro, and the general public.

Further, with these delays in Crenshaw Line construction and grade separation activities causing service operational limitations, the Project ultimately fails to meet all of the threshold requirements in Pub. Res. Code §21168.6.8(a)(3), and particularly the requirement that the Project “(A) Receives a Leadership in Energy and Environmental Design (LEED) gold certification for new construction within one year of the completion of the first NBA season.” (*Id.*) The delays identified above may affect the Project’s ability to achieve the expected GHG and traffic reductions “within one year of the completion of the first NBA season.” Thus, the Project does not meet the definition of the ELDP project in Pub. Res. Code § 21168.6.8 and does not qualify for a certification as such.

**D. The Citywide Parking Amendments in the Ordinance Exceed the Scope of the Project Analyzed in the DEIR.**

This section is also based on *new information* released by the City after the release of the DEIR and not reasonably known during the public comment period, i.e., the City Council’s approval and signing of the Settlement Agreement with MSG Forum, Murphy’s Bowl, LLC, and others on March 24, 2020. Pub. Res. Code §§ 21189.55(d)(2) and (5).

Although the DEIR went to great lengths to document the existing parking regulations in the Inglewood Municipal Code and the proposed transportation management features, it failed to mention that the Project would be accompanied by a highly-impactful stealth ordinance allowing *any* parking facility Citywide to be used for parking for the proposed Sports and Entertainment Complex.<sup>19</sup> (Exh. 21, pdf. p. 14

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<sup>19</sup> The proposed Ordinance is also unconstitutionally vague because it fails to give a reasonable person notice of what is prohibited. Under what circumstances is parking provided “for” the SEC? A few hours prior to major events, or all day even for minor events, guests and employees? What percent of parking guests must be visiting the SEC? Does proximity matter? Can a nonconforming parking lot on the other side of the City remain open every day claiming to be “for” the SEC?



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[Overlay Zone, Section 6]; see also **Exh. 23** [Citywide Permit Parking Ordinance].) The ordinance is undeniably part of the Project – not a related project, and not a stand-alone ordinance – because it is literally inoperable without the Project: without an approved Sports and Entertainment Complex, an ordinance allowing parking Citywide for the Sports and Entertainment Complex has no independent utility. Yet not one word about this seismic regulatory change appears in the Project Description or anywhere in the DEIR.

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The proposed changes to Citywide parking regulations not only renders the Project description fundamentally incomplete, it also undermines the environmental analysis throughout the DEIR. Currently, Inglewood Municipal Code Section 3-63 permits parking facilities to serve as public off-street parking upon issuance of a permit by the Permits and Licenses Committee. Such permits may only be issued when required to reduce traffic hazards – a high standard that would likely apply only during the largest events. The proposed ordinance permits *any* lot to be used for public parking, Citywide, regardless of whether such parking lots are necessary to reduce traffic hazards. The proposed Ordinance radically expands the expected impacts of the Project. This failure also infected traffic and air quality analyses by failing to account for longer exposure to intrusion of traffic in residential neighborhoods. This further inadequate Project description deprived the public and other agencies of the opportunity to fully understand the Project’s impacts. A recirculated DEIR should issue.

**E. Illegal Precommitment.**

This section is also based on *new information* released by the City after the release of the DEIR and not reasonably known during the public comment period, i.e., the City Council’s approval and signing of a settlement agreement with MSG Forum, Murphy’s Bowl, LLC, and others on March 24, 2020. Pub. Res. Code §§ 21189.55(d)(2) and (5).

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Despite the City’s duty to independently make CEQA findings prior to any certification of the EIR as complete and prior to Project approval, the City’s pre- and post-public review period demonstrate that the City and City Council/Mayor have precommitted to approving the Project, including on March 24, 2020 by signing a settlement agreement to dispose of MSG, the Forum, and IRATE’s environmental and other challenges to the Project. (**Exh. 24** [article about Mayor signing the settlement agreement].)

“The Inglewood City Council approved the settlement at its meeting Tuesday. Butts, smiling ear to ear, **paused the agenda so he could**

**sign the document immediately. A copy of the agreement was not available Tuesday. (Id.; emph. added.)**

This occurred after the City Council and the Mayor had a closed-door session related to four pending lawsuits involving the same parties as in the settlement agreement. The meeting – with its open and closed sessions – was in violation of the Brown Act. (Exh. 1 [Cure and Correct letter, April 23, 2020].)<sup>20</sup> The City’s responses to our Cure and Correct – mailed on May 4, 2020 and May 5, 2020 – confirmed: (1) in closed session on March 24, 2020, City Council “unanimously authorized” the settlement agreement between the parties in all four lawsuits; (2) the City Council did not report taking this action in closed session, claiming that the action was not yet final; (3) Mayor Butts signed two other agreements related to the IBEC Project during the open session. (Exh. 25 [City responses].) The settlement agreement “authorized” by the City Council behind closed doors allowed it to end all then-outstanding CPRAs and all claims and cases against Murphy’s Bowl, the City, and Mayor Butts. The tri-party agreement, in turn, made sure that the Petitioners in all four actions were unable to submit comments on the Project any time thereafter: Petitioners would not be able to submit comments during the “standoff” period of escrow while MSG transferred title to the Forum to Murphy’s Bowl, and would not be able to submit comments through third parties thereafter. Mayor Butts signed the tri-party agreement condoning those arrangements, which effectively ended those parties’ prior CEQA claims, and foreclosed future CEQA and other claims by them.

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The pre-DEIR administrative process was marred by the City’s actions with the Court found that the Mayor misrepresented to MSG Forum the future development of the Project site. Although the litigation was against the Mayor, it was further reported that the Councilmembers supported the Mayor and condoned his actions. (Exh. 26 [Dailybreeze article re Mayor may be personally liable].)

19

Bringing it full circle, on March 24, 2020, the City’s decision-making body again confirmed its precommitment to the Project by signing the settlement and tri-party agreement. Since the settlement/tri-party agreement(s) was/were not produced at the hearing, the public could not evaluate its terms or the import of those on the environmental issues under consideration as part of the EIR process.

The lead agency pre-commits to the project where it “contracted away its power to consider the full range of alternatives and mitigation measures required by CEQA’ and

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<sup>20</sup> See [http://ibecproject.com/IBECEIR\\_030991.pdf](http://ibecproject.com/IBECEIR_030991.pdf)

had precluded consideration of a ‘no project’ option. (Citizens for Responsible Government, supra, 56 Cal.App.4th at pp. 1221–1222, 66 Cal.Rptr.2d 102.) ‘Indeed, the purpose of a development agreement is to provide developers with an assurance that they can complete the project. After entering into the development agreement with [the developer], the City is not free to reconsider the wisdom of the project in light of environmental effects.’ (Id. at p. 1223, 66 Cal.Rptr.2d 102.)” Save Tara v. City of West Hollywood (2008) 45 Cal.4th 116, 138.

19

The City of Inglewood is listed as the Lead Agency to certify the Final EIR for the Project, without which the Project may not move forward. The lead agency must make its independent review of the EIR findings before certifying it. The Mayor’s comments in the open session preceded by a closed door session on the same issue, the adoption/signing of the settlement agreement coupled with the inadequate agenda description and failure to produce the settlement agreement prior or during the public hearing for public review and comment – all suggest that the City again precommitted to the Project, and the Council/Mayor will not be able to make independent findings on the EIR, as required by CEQA, or to select an alternative or to reject the Project.

**F. New Comments by Impacted Public Agencies Reveal New Unidentified and Unmitigated Impacts, Mandating Supplementation/Recirculation.**

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This section is based on the new information (comments of public agencies) released to the public on the City’s administrative record website *after* the release of the DEIR and not reasonably known to the public. Pub. Res. Code § 21189.55(d)(4)-(5).

The Project’s plans for increased use of mass transit and alternative modes of transportation were the major feature and baseline assumption to support AB 987 certification and the finding of net zero greenhouse gas (GHG) emissions. The DEIR similarly relies on the same assumptions. However, as evidenced by comment letters from various public agencies, those assumptions are neither enforceable nor realistic and the DEIR and FEIR fail either to identify or mitigate various impacts. Specifically:

**1. Caltrans Comment and Request for More Mitigation Measures.**

21

Caltrans is listed as a responsible agency<sup>21</sup> for the Project in the DEIR (DEIR, at p. 1-8 and 2-90).

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<sup>21</sup> We also object that the City, as now definitively shown in the post-March 24, 2020 release of the proposed FEIR, has failed to comply with all of Caltrans’ original

Based on Caltrans' comments sent on March 24, 2020 and seen after the public review period closed, Caltrans identified significant impacts and proposed additional mitigation measures, which is new information that the public did not or could not reasonably know (**Exh. 27** [Caltrans, March 24, 2020].)<sup>22</sup> In particular, Caltrans stated (in italics):

- *“The Daytime and Major Events at the proposed project arena would cause significant impacts on State facilities, specifically 1-405, under cumulative conditions. Given that this proposed project would result in significant State facility usage, it is recommended that the developer work closely with Caltrans to identify and implement operational improvements along 1-405. 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.*

*To mitigate the potential impacts on the 1-405, we recommend that the project's developer work with Caltrans early on developing a fair share mitigation agreement towards a proposed project that involves adding the aforementioned improvements to the 1-405 within the project's vicinity.” (Id. p. 2, emph. added.)*

Caltrans' comment identified non-mitigated significant impacts on the I-405, which means that the Project may cause significant traffic on the freeway; this in turn affects the GHG emissions and impacts analysis. Slowed traffic results in increased *time*

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study directions to the City for inclusion in the EIR. This is another failure to proceed by the City in the manner required by law. This objection also applies to the City and the FEIR's disregard of the comments and study directions provided by other responsible agencies like Los Angeles County Metro.

<sup>22</sup> [http://ibecproject.com/IBECEIR\\_030279.pdf](http://ibecproject.com/IBECEIR_030279.pdf)

for cars on the road, *more* cars on the road at the same time, and more GHG emissions. It follows that both the AB-987 and CARB approval and the DEIR use the wrong baseline of calculating GHG emissions based on the freeway speed of 65 mph instead of slower speeds, more cars, and more GHG emissions.

Second, Caltrans' proposal that the Developer work with Caltrans to develop a fair share mitigation agreement shows there is presently no enforceable agreement and by inference no enforceable mitigation at this time. This lack of enforceable agreement runs counter to CEQA's mandate that mitigation measures be fully enforceable. Pub. Res. Code § 21081.6(a)-(b), Guidelines, § 15126.4(a)(2).

- *“Per Table K.2-T, K.2-U, K.2-V, K.2-W, and K.2-X, Northbound (NB) and Southbound (SB) 1-405 mainline segments will have **direct significant impact(s)** due to weaving/merging operation. Please identify the mitigation measures, if any.” (Id. at p. 2; emph. added.)*

Caltrans' comment above indicates significant direct impacts for which the DEIR identified no mitigation measures. As to the requirement to both identify impacts and mitigation measures, as well as mitigate and/or prevent impacts under Guidelines § 15002(a) in the DEIR, the City failed, rendering the DEIR incomplete and precluding informed public comment or decisionmaking.

- *“Mitigation measure 3.14-3(c) includes restriping the center lane on the 1-405 NB Off-Ramp at West Century Boulevard to permit both left and right-turn movements. Caltrans anticipates that **the conversion of the middle lane to a shared lane will result in queue for the left turn traffic.** Please provide further explanation to **justify** that the mitigation measure at the 1-405 NB off-ramp at West Century Boulevard will not lead to **significant impacts.***

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

Caltrans' comment identifies potential significant impacts from the proposed conversion of the middle lane to a shared lane. This potential impact was not identified

for the public to comment on. Moreover, the comment proposes *widening of the off-ramp*, which will require Intersection Control Evaluation (“ICE”) screening for the intersection modification. The DEIR failed to provide the requested information, precluding informed public comment and decisionmaking.

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

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

- o Eastbound (EB) 1-105 on-ramp from Imperial Highway*
- o EB 1-105 on/off-ramps from 120th Street*
- o Westbound (WB) 1-105 off-ramp to Hawthorne Boulevard.”*  
*(Id.; emph. added.)*

Caltrans’ comment above shows that the City and the DEIR failed to identify *all feasible* mitigation measures, which in turn means that the DEIR is incomplete and the Project *may not* be approved with the Statement of Overriding Consideration pursuant to Pub. Res. Code § 21002. The Agency must work with Caltrans, perform all studies and use all methodologies directed by Caltrans, add mitigation measures that Caltrans suggests, and then recirculate the DEIR so the public may comment on those, as required by CEQA. There are at least three locations where, per Caltrans, mitigation measures are feasible and failure to incorporate those will affect the environment.

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- *“As a reminder, **Caltrans requires** the Intersection Control Evaluation (ICE) Step One screening to be conducted as per the guidelines set forth in the Caltrans ICE Process Informational Guide for Traffic Operations Policy Directive 13-02 - Please perform Intersection Control Evaluation (ICE TOPD) at the **following locations.**”*
  - o WB 1-105 off-ramp approach to South Prairie Avenue*
  - o WB 1-105 off-ramp to Crenshaw Boulevard.”* (Id. pp. 2-3.)

The comment shows that no ICE screening as to the viability of the intersection modifications occurred, which further shows that the DEIR's proposed mitigation measures have not been validated and shown to be enforceable as required by CEQA.



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## 2. Metro Comment and EIR's False Baseline Assumptions.

On March 24, 2020, another responsible agency, Los Angeles County Metro, sent its own comments on the DEIR, which revealed new information. (Exh. 28 [Metro's comment, March 24, 2020].)<sup>23</sup> The Comment raised numerous discrepancies in the DEIR, affecting the baseline and requiring new mitigation measures. Although Metro's focus in the comment letter was to eliminate discrepancies and seek cooperation with the Applicant/City to resolve those, Metro's comments provide substantial evidence of a host of environmental impacts that were not disclosed and not mitigated. In particular, Metro notes (in italics):

- *“Page 3.14-47, “Fixed-Route Bus Service”: The narrative describes scheduling shakeups as occurring in December and July of each year. This should be corrected to **December and June** (not July). Also, **shakeups include both minor and major changes** (not just minor as the narrative describes).”* (Id. at p. 2; emph. added.)

“Major changes” and shakeups in “December and June” of each year in scheduling is substantial evidence of unstudied potentially significant impacts, contrary to the City's narrative. December is a busy month, in view of the holiday season accompanied by concerts and events. Major shakeups during two months vastly affect the baseline assumption in the Project regarding possibilities to coordinate events and transit services, themselves highly vague and imprecise “mitigation measures.”

- *“Page 3.14-53, “Adjusted Baseline Transit Assumptions”:* *The narrative describes rail operating plan C-3 that was adopted by the Metro Board of Directors (Metro Board) as being a two year service plan; however, the Metro Board motion indicates the proscribed [sic.] period is **only one year** (not two).”* (Id. [Metro comment, p. 2].)

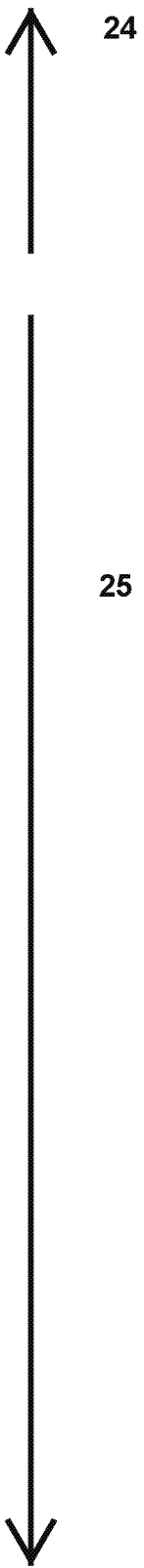


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<sup>23</sup> [http://ibecproject.com/IBECEIR\\_030294.pdf](http://ibecproject.com/IBECEIR_030294.pdf)





The fact that the adopted rail operating plan C-3 is for one year, not two, is substantial evidence of the remaining one-year impacts that were overlooked in the DEIR and improperly deemed as mitigated.

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

*“Also, please note that the **K Line** is being designed to provide service **with three-car trains.** However, platform lengths on segments of the existing C Line can **only** accommodate **two-car train service.** Metro is **seeking grant funding** from the State of California to extend platforms at four C Line stations. However, in the event that such grant funding is **not secured, trains may be limited to two-car service which would limit their carrying capacity for events at the Project site.**” (Id. at p. 2; emph. added.)*

These passages are substantial evidence that the DEIR **inflated the baseline** by presenting more services and train capacity than realistically exists and therefore understated the Project impacts. It is also important to note that most if not all events occur in the *evenings* and on the *weekends*. A new DEIR should both correct the proper

information and analyze, quantify, and mitigate the impacts of such reduced services and capacity.<sup>24</sup>

- *“While funding and tentative construction timelines [of grade separation project for the K Line at the Centinela/Florence intersection] have not yet been identified by the Board for this project, the City and Applicant should be advised that construction of this project may coincide with construction of the Inglewood Basketball and Entertainment Center. For the duration of the grade separation construction, the K Line could have operational limitations and therefore may not provide the same level of service to the arena and other venues in the vicinity temporarily.” (Id. at p. 3.)*

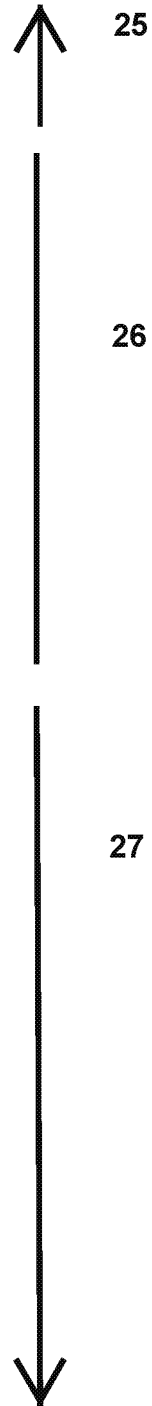
Consistent with Metro’s comment, the City must disclose/mitigate this operational limitation in the DEIR and the cumulative impacts of parallel construction.

- *“Shuttle Service provision: The EIR should describe/confirm, in the Project Description section and/or the Transportation and Circulation section:*
  - a) *whether the shuttles will be a private bus service, funded and/or provided by the Applicant, or a municipal/public-provided service;*
  - b) *the frequency of shuttles (headways) proposed for event days;*
  - c) *whether fares for the shuttle will be free, paid, or TAP-card enabled.*

*Shuttle service hours and augmenting staff (law enforcement, traffic officers and general support) pre- and post-event should be extended on days with*

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<sup>24</sup> We also note as a general objection applicable throughout this letter that the City may not, for the first time in an FEIR, introduce substantial new information or changed data that should have first been part of the DEIR. Any attempt to cure the deficiencies noted herein, and as noted by other commenters, in the FEIR will be a further violation of CEQA.



*concurrent events at the Forum or SoFi Stadium to assist with excessive pedestrian and vehicle traffic.” (Id. at p. 4; emph. added.)*

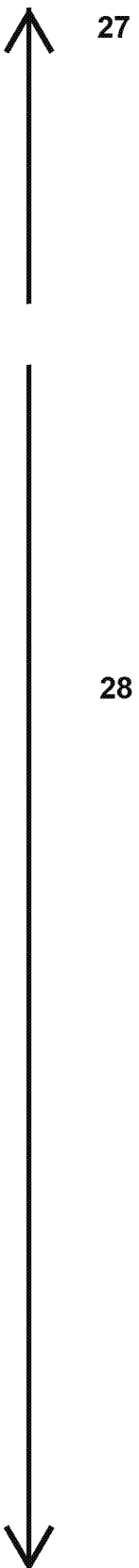
Similar to the above comment, the City must disclose the requested information and address all impacts, rather than leave those issues vague and defer mitigation.

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

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

*Staff Support **Additional traffic officers and law enforcement support** should be provided by the Applicant at transfer locations between rail and the shuttle service (at street level, not Metro property) to **mitigate pedestrian and vehicle conflicts** at intersections and sidewalks on the day of the event.” (Id. at p. 5; emph. added.)*

The above-noted omissions in the DEIR (adequate curb space, street closures, and more traffic officers and law enforcement officers) were not addressed in the DEIR and their impacts have not been considered. For example, if street widening is required then – as a domino effect – the Project’s design and size will have to change. Street closures



mean more traffic spill-over to adjacent streets, and additional traffic officers suggest slower traffic. Slower traffic contributes to more cars on the road and more GHG emissions, not identified/mitigated in the EIR process.

The DEIR must be supplemented with the above noted information and recirculated to the public and public agencies for review and comments.

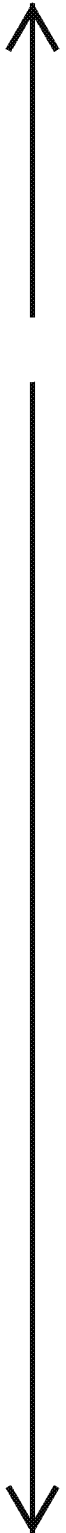
**3. Los Angeles Department of Transportation Comment re Incorrect Baseline.**

LADOT comment reveals several flaws and omissions in the DEIR which need to be corrected and addressed, to comply with CEQA. In particular, LADOT wrote:

- *“[T]he project analysis has been executed using an “adjusted baseline” calculation to establish the “existing” traffic conditions level against which to determine Project activity traffic increases. While LADOT agrees with this analytical approach, it should be noted that the “adjusted” traffic activity attributable to the HPSP is additional traffic, that in-and-of itself, will contribute significant traffic activity increases to City of Los Angeles intersections while also creating elevated baseline traffic conditions for the proposed project. Therefore, although the IBEC project is being analyzed separately from the HPSP, there is clearly a need to ensure comprehensive coordination between the two projects, particularly in regard to stadium events. In order to provide comprehensive mitigation and ongoing collaboration, a cooperative mitigation program for both projects should be considered.” (Exh. 29, p. 2, emph. added. [LADOT Letter].)<sup>25</sup>*

First, even though “LADOT agrees” with the DEIR’s use of the “adjusted baseline” or elevated baseline of existing traffic conditions in view of the NFL stadium slated to complete construction in 2021, such baseline calculation violates CEQA. CEQA generally requires the baseline to reflect the “existing conditions” at the time the “Notice of Preparation” is published. Guidelines § 15125(a)(1). The requirement is to

<sup>25</sup> See [http://ibecproject.com/IBECEIR\\_030295.pdf](http://ibecproject.com/IBECEIR_030295.pdf)



ensure that the impacts of the Project are considered at the *earliest* possible time.<sup>26</sup> The Notice of Preparation for the Project was published on February 20, 2018. Therefore, the EIR’s use of an adjusted baseline of 2021 was an error as a matter of law, as it artificially inflated the baseline and understated the impacts. Put differently, the cumulative impacts of the Clippers Project *together with* the NFL project were not analyzed in the NFL project and evaded review in the IBEC DEIR – exactly what CEQA prohibits. POET, LLC v. State Air Resources Bd. (2017) 12 Cal.App.5th 52, 83.

Second, even LADOT acknowledges the practical effect of the Project DEIR’s analysis, which understated the cumulative “additional traffic” of the IBEC Project together with the NFL stadium and requires coordination of events. Even if MSG Forum and Clippers have agreed to coordinate their events for a “\$400 million” settlement, there is no such agreement between the NFL and IBEC projects. For this additional reason, the Project DEIR is incomplete and flawed, requiring use of a corrected baseline and reevaluation and mitigation of understated impacts.

- LADOT’s comment re “Traffic Mitigation” requests *mandatory* language to be added in the proposed mitigation measures to “deploy officers” to help with queuing conditions on streets, and requires collaboration with LADOT to secure approvals for the mitigation measures (removal of “*median islands*”). (Exh. 29, p. 2 [LADOT Comment].)

The noted recommendations suggest that there is no mandatory enforceable collaboration between LADOT and the Applicant, and that the DEIR improperly deferred mitigation measures for no acceptable reason under Guidelines § 15126.4(a)(1)(B). The improper deferral violated CEQA.

- In its Comment 5 re Traffic Mitigation, LADOT identifies another omission in the DEIR: “*The Project does not identify specific measures to address the potential impact to key City of Los Angeles corridors leading into the project. Therefore, it is imperative that further collaboration on this issue be afforded in order to fully explore potential mitigation. The discussion of this mitigation should also include direction to*

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<sup>26</sup> Even though the Project *aims* for traffic reduction, there is no substantial evidence in the record that such traffic reduction is plausible. Public comments from the transit-regulating agencies have identified many omissions and flaws in those assumptions.

*determine an appropriate agreement instrument in order ensure appropriate funding for any necessary event-day resources.” (Id. at p. 3 [LADOT Comment].) The Comment also underscores deferred mitigation measure and the lack of any specific commitment or financial arrangement to resolve the problem. The DEIR’s deferred mitigation violates CEQA.*

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These defects render the DEIR invalid and require correction to the baseline assumptions, supplementation of the missing information, incorporation of enforceable mitigation measures, and recirculation of a correct DEIR for public review and comment.

**4. LA Public Works Comment re Omitted Impacts/Mitigation and Methane Hazards.**

“Good faith effort at full disclosure” is a key mandate in CEQA. Guidelines § 15151. LA Public Works’ comment, which was “received” by the City on March 24, 2020, identified several instances where the Project DEIR failed in the required good faith full disclosure, thereby making it incomplete. LA Public Works wrote:

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

- *The leading **pedestrian intervals** at the intersections of Century/Van Ness and Normandie/Century.*
- ***Curb extensions** at Century Boulevard/Gramercy Place (Intersection #51) at the southeast and northeast comers. Note that although these curb extensions will not impede right-turning vehicles, please include a comment to the consultant to **ensure that defacto right turn lanes were not assumed** at this intersection in their line-of-sight calculations.” (Exh. 30, p. 2 [Public Works Letter]; emph. added.)<sup>27</sup>*

LA Public Works’ comment requests disclosure and assurance that the DEIR is not based on an incorrect baseline. It fully questions the validity of the DEIR’s

<sup>27</sup>

See [http://ibecproject.com/IBECEIR\\_030282.pdf](http://ibecproject.com/IBECEIR_030282.pdf)



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calculations, which questioning has not been properly or adequately addressed in the FEIR.

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

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- *The leading pedestrian intervals at the intersections of Lennox/Inglewood, Lennox/Hawthorne, 111th/Hawthorne, Lennox/Freeman, 104th/Inglewood, and 104th/Hawthorne.” (Id. at p. 2 [Public Works Letter]; emph. added.)*

The comment identifies another traffic impact that was not disclosed in the EIR. Any traffic enhancement may have its own impacts and needs respective disclosure and mitigation in the DEIR. This again shows the proposed FEIR to be legally deficient.

- *“SB 1383, which requires a 50 percent reduction in anthropogenic black carbon and a 40 percent reduction in hydrofluorocarbon and methane emissions below 2013 levels by 2030, where methane emission reduction goals include a 75 percent reduction in the level of statewide disposal of organic waste from 2014 levels by 2025 . . . “ (Id. at p. 2; emph. orig. [Public Works Letter]).*

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The comment above regarding methane underscores the DEIR’s lack of methane hazards disclosure. The Project EIR vaguely provides:

“As indicated previously, the Project Site is not located within the immediate vicinity of an active or abandoned oil well. The closest known oil production well is located approximately 1,200 feet northeast of the Project Site and is categorized as “idle.”

“Methane (CH<sub>4</sub>) is a naturally occurring colorless gas associated with the decomposition of organic materials. In high-enough concentrations, methane can be considered an explosion hazard. According to the Los Angeles County Department of Public Works Solid Waste Information Management System, the Project Site or its elements are not within 300 feet of an oil or gas well or 1,000 feet of a methane producing site. As such, the potential for explosive



methane gases impacting the Project Site is low.” (DEIR, pdf p. 541.)

The statement in the EIR is inaccurate. Based on information from DOGGR, there is an oil well API: 0403720016 as close as 449.6 ft. from the Project site; the oil well was reabandoned in 2016. (Exh. 31 [oil well next to project site].)<sup>28</sup> This is apart from the *idle* oil well indicated in the DEIR. Moreover, the DEIR does not explain what “idle” means and suggests that it is somehow harmless, where in fact idle wells present more risks than properly abandoned ones. (Exh. 33 [idle wells are a major risk].)<sup>29</sup>

Finally, the DEIR comment is non-specific as to whether any of the Project’s proposed 28-acre site is located within a methane zone. (DEIR, pdf p. 491, 541.)

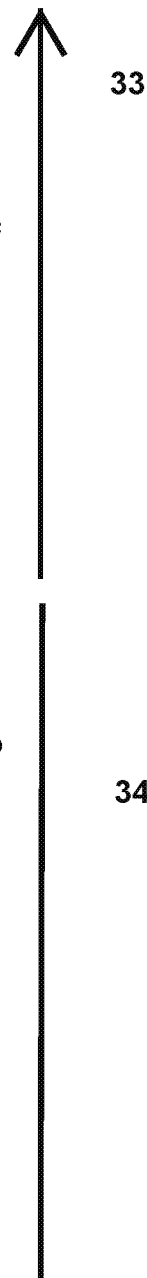
The fact that the LA Public Works’ comment requires the DEIR to mention methane reduction goals of 75% and that the DEIR inaccurately and vaguely presents methane hazards and the adjacent oil well near the Project site allow the DEIR to skirt analysis of oil well/methane combination hazards near the Project site. This is a failure to provide necessary information for informed decision making by the lead agency and the public, as well as other public agencies. It is known that methane being a light explosive gas seeks “preferential pathways” to reach the surface and is therefore more dangerous in the vicinity of oil wells providing such openings and conduits. (Exh. 34, [Lorena Plaza Project MND excerpt].)

Thus, while the DEIR denies that the Project is within 300 feet of an oil well or 1,000 feet of a methane producing site, it does not conclusively establish lack of methane hazards, especially where the DEIR inaccurately presents the closest known oil well to be 1,200 feet away. The DEIR presents incomplete and raw data and does not provide the analytic path traveling from those raw facts to the conclusion of low impacts. The EIR fails to provide substantial evidence on a critical safety issue of methane gas and methane explosion, while proposing to attract tens of thousands of people to the area.

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<sup>28</sup> Based on MSG Forum’s unsealed court documents lawsuits, the City (Mayor Butts) and Clippers contemplated the IBEC Project in 2016. See (Exh. 32 [Clippers’ City’s 2016 Concealment Efforts].) <https://therealdeal.com/la/2019/02/26/l-a-clippers-city-worried-msg-would-learn-of-inglewood-arena-plans/>

<sup>29</sup> <https://www.fractracker.org/2019/04/idle-wells-are-a-major-risk/>





- “Clarify the type of **pedestrian flow management** that will be used. The document should note the type of proposed management, particularly in the southwest corner of the proposed project site.” (Exh. 30, p. 3 [Public Works Comment, 3-24-20]).

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The comment reveals another significant omission in the DEIR related to transportation and circulation. That is that the Project won AB 987 certification primarily for its claim to be able to reduce GHG emissions through alternative modes of transportation, including walking and biking. Therefore, the DEIR’s failure to regulate the pedestrian flows – for a Project that can accommodate 18,000-20,000<sup>30</sup> attendees at a time for the events and includes other amenities, such as a sports clinic, with their own flow of visitors – cannot omit disclosure and analysis of this critical pedestrian flow management issue. This concern was raised *inter alia* in Culver City’s April 1, 2020 comment about narrow sidewalks. (See Sec. VI.F(5), *infra* [Culver City comment].)

Moreover, the more pedestrians that are crossing the streets and the less such flows are managed, the slower the traffic on the streets will become. The more pedestrians are on the streets, the more red light signals will be triggered to halt traffic. These impacts will be further aggravated in view of potential similar large events at the nearby Forum and NFL arenas.

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

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<sup>30</sup> Even though both the DEIR and the AB 987 certification project application have been consistently speaking about an 18,000-seat arena, the City’s latest communications *after the DEIR public comment period closed* have been noting 18,000-20,000 seats. (Exh. 35 [real estate appraisal item in City Council agenda packet, May 5, 2020].) This reveals another instance of filing to have an “accurate, stable and finite project description,” and perhaps more importantly, reveals an undercounting and artificial diminishing of the Project’s true magnitude and impacts. Based on this changed attendance/capacity figure, the entire DEIR should be recirculated and all measurements and metrics reanalyzed to account for this greater than 10% increase.

- *Please use the enclosed ICU methodology for all signalized intersections and unsignalized intersections within or shared with the County.*
- *Address mitigations for each County-impacted intersection.*
- *Provide an event management plan to Public Works for review” (Id. at p. 4 [Public Works Letter]).*

The comment identifies a flaw and error in the DEIR’s methodology, requiring it to identify *more intersections* as significantly impacted and to mitigate that impact. As stated in OPR’s letter to the City dated December 4, 2019, “According to AB 987, the project’s Travel Demand Management (TDM) program must achieve trip reduction of 15 percent by January 1, 2030 and 7.5 percent by the end of the first NBA season. The TDM program is required to include specific measures, as listed in the statute.” (Exh. 36 [travel efficiency comment from OPR, December 4, 2019].)

The omissions noted in the Public Works comment on the DEIR establish that the findings of the DEIR, also relied upon in the AB 987 certification – which requires achieving 15% reductions in traffic and 50% reduction of GHG impacts – are not supported by substantial evidence. In the words of California legislators about this very Project:

“To mitigate this **artificially low** estimate of net GHG emissions, the applicant proposes the **Transportation Demand Management (TDM) program/targets** (47-48% of total) and 50% of the reductions attributable to the LEED Gold certification (2.5% of total), both required by the bill. They **claim** this gets to 49.5-50.1 % of required reductions, conveniently achieving AB 987’s local GHG mitigation floor of 50%. By **lowballing** net GHG emissions, the applicant **circumvents** the need to make any of the local GHG mitigation investments, and associated community benefits, touted when the bill was before the Legislature.” (Exh. 11, at p. 420 [AB 987, California Legislators, June 28, 2019].)<sup>31</sup>

<sup>31</sup> See <http://opr.ca.gov/ceqa/docs/ab900/20190628-IBEC.pdf>



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The City must supplement/correct the information in the DEIR and recirculate the updated DEIR for public review and comment.

**5. Culver City Comment About Sidewalk Width, Need for Bike Lanes, and Defined Transportation Management.**

Culver City, which had requested several extensions of the public comment period to accommodate for COVID-19 constraints, submitted its comments on April 1, 2020. We could not have seen those comments prior to March 23, 2020. Culver City is adjacent to Inglewood, and will be immediately and negatively impacted by the proposed Project.

The comment raises the issue of the width of the sidewalks and the need for bike lanes to accommodate the Project's claimed pedestrian/bike flows. Since traffic and the noted alternative modes of transportation are directly associated with GHG emissions, the comment presents new information and proposes new mitigation measures, signaling more impacts than those disclosed. In particular, Culver City stated:

- *Chapter 3.14 page 50. Pedestrian Network.* It is unclear based on the description how wide different sections of the sidewalks are along South Prairie Avenue and West Century Boulevard. Immediately adjacent to the project site, along South Prairie Avenue and West Century Boulevard, it is also unclear whether the "8-foot landscaped area that also contains signage and utilities" is an area that people can walk on as well if the five foot wide sidewalk gets too crowded. Five feet wide sidewalks support two people walking side by side, and eight feet wide sidewalks support two pairs of people passing each other (Boston Complete Streets Guidelines). **Narrow sidewalks do not support heavy pedestrian activity and can create unsafe conditions where people walk on the street.** The project should consider **widening the sidewalks within the vicinity of the project site** to accommodate the thousands of attendees for Clippers games and other big events.  
[https://nacto.org/wpcontent/uploads/2016/04/1-6\\_BTD\\_Boston-Complete-Streets-Guidelines-2.4-6-SidewalkWidths\\_2013.pdf](https://nacto.org/wpcontent/uploads/2016/04/1-6_BTD_Boston-Complete-Streets-Guidelines-2.4-6-SidewalkWidths_2013.pdf) (Exh. 37, p. 1 [Culver City comment letter].)



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This comment provides a link to studies about the width of sidewalks and recommends *widening sidewalks* near the Project area. While the comment focuses on the need and benefit to widen the sidewalk for pedestrians, it does not mention the environmental impacts of such widening of sidewalks, nor needed mitigation for that. Should the Project indeed widen the sidewalks, it will involve modifications to the streets or the Project, longer construction impacts, and need for additional mitigation. But if it doesn't widen them, the impacts and problems as noted remain unaddressed and unmitigated. The DEIR may not simply respond to the Culver City comment and specify the width of the sidewalk, without addressing concerns and recirculating the DEIR for public review and comment.

The inadequate sidewalk width issue raised by Culver City is also renewed by the new information about the proposed two illuminated motion billboard signs proposed on both South Prairie St. and on Century Blvd. – exactly where the problem was identified by Culver City. See Sec. VII.A, infra (piecemealing of Billboard Project from IBEC Project and this firm's objection letter to the Billboard Project MND, April 14, 2020, incorporated herein by reference.) Tellingly, the DEIR misrepresents the specifications of the billboard signs at those locations and does not state that they are motion signs. The Billboard Project MND failed to disclose the IBEC Project, or its obvious connection to the IBEC Project, and that it is apparently proposed on the 5-foot-wide sidewalk itself.

- “Chapter 3.14 page 50. Bicycle Network. The project should also consider adding bike lanes on South Prairie Avenue and West Century Boulevard. E-scooters could also use the bike lanes as well. Creating a safer environment for bikes and e-scooters could provide first/last mile travel options for people traveling to/from the arena.” (Id. p. 1 [Culver City comment, April 1, 2020].)

On the other hand, the comment's recommendation of adding bike lanes, if followed, would require either eliminating one lane or curbside parking (and creating more traffic) or significantly altering the Project, each requiring mitigation and renewed review. Also, should the Project indeed add bike lanes, the DEIR must specify that information, City/Applicant must consult with various responsible agencies (including Metro, LADOT, CALTRANS, and LA Public Works) and address the associated impacts.



In sum, the comments by multiple public agencies disclose unidentified and unresolved issues, which CEQA requires the EIR to consider, mitigate and prevent to the extent feasible. The FEIR brushes these concerns aside and does not engage in a good faith effort at responding, much less at full disclosure. This is particularly troubling as a key purpose of receiving comments from other agencies is to engage in an open, iterative process that benefits from those other agencies' particular areas of expertise. As such, the DEIR and FEIR are faulty, may not be legally certified without supplementing the missing information and analysis, and recirculating the DEIR for renewed comment.

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**VII. THE CITY HAS PIECEMEALED THE PROJECT IN VIOLATION OF CEQA AND STATE PLANNING AND ZONING LAWS IN SEPARATELY ADOPTING PIECEMEALED PROJECT COMPONENTS.**

This section is based on *new information* released by the City after March 24, 2020. Pub. Res. Code §§ 21189.55(d)(2) and (5).

The City and the Applicant have engaged in blatant piecemealing of the IBEC Project, several examples of which came to light only after the close of the public comment period on the Project DEIR. As revealed to date, the Project piecemealed at a minimum five Project components: (1) the Billboard Project by WOW Media to install two motion illuminated billboard signs; (2) Hotel Project; (3) General Plan amendment of the Land Use Element; (4) General Plan amendment of the Circulation Element; and (5) General Plan amendment/adoption of Environmental Justice (EJ) Element. This list is not a complete list of piecemealing actions, but only reflects the information disclosed by the City to date, *after* March 24, 2020, and discovered by us.

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**A. Illegal Piecemealing of the Billboard Project.**

For violations of CEQA with respect to the Billboard Project piecemealed from the IBEC Project, we incorporate by reference our objection letter sent to the City on April 14, 2020. (**Exh. 38** [TSLF Objections to MND for the Billboard Project, April 14, 2020].)

The City's responses to and denials of our piecemealing objections, as expressed in the staff report, are unsupported. The billboard signs are proposed to be placed on property apparently soon to be owned or controlled by Murphy's Bowl, pursuant to the draft Disposition and Development Agreement. (**Exh. 39** at p. 21 [Disposition and Development Agreements].)



**B. Piecemealing of the Hotel Project.**

The EIR references the construction of a hotel at the east side of the Project, but does not disclose details about it, such as the number of stories or parking spaces, setbacks, or height of the building. The DEIR only mentions an approximate number of rooms. For example, the DEIR does not mention whether the hotel will have any accessory uses, such as restaurants or bars, whether those will be allowed to serve alcohol or will be open to the general public. Answers to this missing information in the DEIR would better illuminate the Project's total impacts and would enable analysis and mitigation of those potential impacts. At a minimum, the DEIR fails as an informational document because of the lack of an accurate project description.

The March 31, 2020 Draft Disposition and Development Agreement prepared by the Applicant, Murphy's Bowl, discloses that the hotel will be developed by a different developer who will be responsible for obtaining entitlements for it.<sup>32</sup> The segmentation of the hotel from the whole of the action contemplated by the Project is piecemealing prohibited by CEQA and effectively curtailed CEQA review of the Project's overall impacts, along with those of the hotel, in the IBEC DEIR.

**C. Piecemealing of the Inglewood Transit Connector Project.**

The Project does not note that it is part of the Inglewood Transit Connector Project. However, the administrative record, including the AB-987 documents, show that the Project has two parts: the Arena site and a "transportation" component. Pub. Res. Code § 21168.6.8 (a)(6).

In the meantime, the Inglewood Transit Connector Project, which was officially initiated at the same time as the IBEC Project (Initial Study, July 2018),<sup>33</sup> is relied upon in the DEIR as a mitigation measure of traffic impacts, connecting the Project site to Metro's Crenshaw Line and originating exactly across from the Project site at the intersection of Century Blvd. and Prairie St.

<sup>32</sup> See at p. 37 of [http://ibecproject.com/IBECEIR\\_030287.pdf](http://ibecproject.com/IBECEIR_030287.pdf)

<sup>33</sup> See <https://www.cityofinglewood.org/DocumentCenter/View/11934/Initial-Study>



The Inglewood Transit Connector Project has not advanced beyond the initial study at this time of the proposed approvals of the Project and certification of the Project EIR, which relies on it. Thus, the Project relies on another project as a mitigation measure, which did not have its own environmental review completed and which impacts are not included in the Project DEIR as either part of the IBEC Project itself, or at a minimum, a related project needed to be included in the IBEC Project DEIR for, *inter alia*, cumulative impacts purposes. These omissions are a further fatal flaw.

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**D. Piecemealing of Public Works Improvements on Arterial Roads, Adding Lanes, and Enhancing the Capacity for Traffic Increase.**

As evidenced by photos taken by our client and incorporated into our objections to the Billboard Project and its MND, the arterial streets around the Project site have been undergoing extensive road improvement work. We requested records on the road improvements from the Public Works Department on April 9, 2020; however, the City failed to respond to our requests. We reserve the right to request augmentation of the record with such evidence. Still, in light of the available evidence and on information and belief, it appears that the City's road improvement project was also part of the Project here and intended to enlarge the streets, add lanes, provide electrical circuits for the billboard signs, all as part of and in furtherance of the Project.<sup>34</sup>

**E. Piecemealing and Piecemeal Approval of the General Plan Amendments.**

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We incorporate by reference our April 13, May 26, and June 9, 2020 objection letters. (Exh. 40 [Objection letters to GP Amendments].)

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<sup>34</sup> As noted above in Sec. VI.D, *supra*, the City has also planned and is separately implementing extensive amendments to parking regulations as part of the IBEC Project, whereby all residential streets in the City will become part of a parking district and will have only a limited number of cars allowed per unit, while IBEC may seek parking outside of its Project area. These extensive and drastic amendments to parking regulations – to the detriment of the residents of the City and for the benefit of the IBEC Project – are also an example of the IBEC EIR's piecemealing in violation of CEQA. Further, the City's changes to the parking regulations implicitly counters the IBEC Project's assumptions and claims of reduced traffic for IBEC Project events.

In addition to the violations listed in prior letters as to the City's illegal adoption of these General Plan amendments, the City's IBEC Project and EIR violated CEQA and the State Planning and Zoning Laws as follows:

**1. The Circulation Element Amendment in the DEIR Violates State Planning and Zoning Laws.**

Even though the IBEC DEIR includes amendments to the Circulation Element, it does not serve the purpose of the correlation requirement in Govt. Code § 65302. The correlation requirement is to ensure that the City does not make significant land use amendments without resolving the infrastructure needs and traffic circulation issues to support them. Here, the IBEC Project – with anticipated 18,000-20,000 visitors for just the events, as well as numerous visitors to the Project's other amenities, such as the hotel, bars, restaurants, retail, and medical center – contemplates a dramatic influx of visitors to Inglewood, and to the area already impacted (to be impacted) by two other major arenas. The Circulation Element therefore was to *create* infrastructure to support such pedestrian and traffic influx.

However, the DEIR does not specify any change to the Circulation Element in Section 2.6 of the DEIR, and the only change suggested by the Applicant in its draft General Plan Amendments is striking out the designation of 102nd street as a collector street. Thus, the proposed changes are not to *create* the infrastructure to *support* the anticipated pedestrian and traffic circulation but rather to *remove* such infrastructure. By definition, collector streets in Inglewood's Circulation Element are to "collect" or link traffic from the small streets to the arterial streets. The Project proposes to remove this collector. This late-disclosed change is in addition to the fact that the Project also intends to vacate portions of both 101st and 102nd streets as well as to allow encroachments by the Project onto the public rights of way. Finally, based on the DEIR's unspecified and the Applicant's recently proposed overlay zone details, the Arena is proposed with absolutely no front, rear, or side yard setbacks and will therefore not allow for widening of any portion of the adjacent streets.

The amendments to the Circulation Element are a violation of the General Plan's internal consistency and the correlation requirement.



**2. The IBEC DEIR Violates CEQA Because of the *Incomplete* General Plan Consistency Analysis in View of the Missing EJ Element.**

CEQA requires any project EIR to analyze the consistency of such project with the General Plan. Guidelines § 15125(d); see also Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Sup'rs (1998) 62 Cal.App.4th 1332, 1336 “Because an EIR must analyze inconsistencies with the general plan (14 Cal. Code Regs § 15125(d)), deficiencies in the plan may affect the legal adequacy of the EIR. If the general plan does not meet state standards, an EIR analysis based on the plan may also be defective. For example, in Guardians of Turlock’s Integrity v. Turlock City Council (1983) 149 Cal.3d 584, 593, the general plan did not contain a noise element; thus “a necessary foundation” to acceptable analysis in the EIR was missing.” 2 Kostka & Zischke, Practice Under the Cal. Environmental Quality Act, § 20.3, p. 20-9; see also Friends of “B” Street v. City of Hayward (1980) 106 Cal.App.3d 988, 998-999.

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The City’s piecemealing of the EJ element from the IBEC DEIR has resulted in the missing mandatory EJ element and thereby an inadequate analysis of the IBEC Project’s consistency with the General Plan in the DEIR.

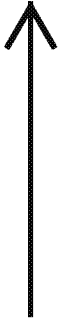
Comments by others, such as the NRDC or members of the State Legislature, show that the Project is inconsistent with EJ principles as mandated by the Government Code, and therefore may not be adopted as the City proposes.

A land use decision (or zoning ordinance) must be deemed inconsistent with a general plan if it conflicts with a single, mandatory general plan policy or goal. Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Supervisors (1998) 62 Cal.App.4th 1332, 1341. A local land use decision that is inconsistent with the applicable general plan is invalid when passed, i.e., *void ab initio*. Leshner Communications, Inc. v. City of Walnut Creek (1990) 52 Cal.3d 531, 540. Despite the questionable policies in the newly adopted EJ Element, the IBEC Project is inconsistent with the Element’s goal – per state mandate – to ensure the health of the population.

The City’s approach and piecemealing has made the “process exactly backward and allows the lead agency to travel the legally impermissible easy road to CEQA compliance.” Berkeley Keep Jets Over the Bay Committee v. Board of Port Com’rs (2001) 91 Cal.App.4th 1344, 1371.



Despite the City and Applicant’s throwing caution to the wind in rushing to approve the FEIR and Project, the IBEC EIR may not be certified and the Project may not be approved without a complete EIR, which discloses all pieces of the Project in their full scope, and which provides for genuine, responsive, informed and meaningful public participation in the drafting of the EIR and General Plan amendments. “[E]xpediency should play no part in an agency’s efforts to comply with CEQA.” San Franciscans for Reasonable Growth v. City and County of San Francisco (1984) 151 Cal.App.3d 61, 74-75.

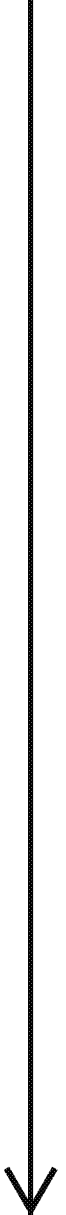


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**VIII. THE EIR AND PROJECT VIOLATE CEQA’S PRECOMMITMENT PROHIBITION BY THE CITY’S SIGNING THE EXCLUSIVE NEGOTIATING AGREEMENT AND PRIOR VIOLATIONS OF THE BROWN ACT.**

On March 24, 2020, on the last day of the inadequately noticed public comment period, the City Council violated the public trust yet again by convening behind closed doors and unanimously voting to settle four lawsuits, including one on CEQA and one on Brown Act violations.

We have requested that the City cure and correct the Brown Act violations committed on March 24, 2020, which would have resulted in the invalidation of the settlement agreement approval and any action taken by the City Council on March 24, 2020. The City denied any Brown Act violation occurred on March 24, 2020 and denied the existence of a settlement agreement in its letter *backdated* April 30, 2020, mailed out on May 4, 2020, without any emailed copy, as claimed on the letter. The City then sent us a supplemental letter on May 5, 2020, where it admitted that on March 24, 2020, the City Council indeed authorized the settlement agreement. The copy provided by the City bears no dates of execution of the agreement by any signatory, including by Mayor Butts. Most importantly, both responses from the City to our Cure and Correct occurred *after* May 4, 2020, when Murphy’s Bowl successfully closed escrow transferring MSG Forum to Murphy’s Bowl.



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The City’s settlement and disposal of CEQA and Brown Act lawsuits late on March 24, 2020 as to MSG/Forum, IRATE, and related persons is significant new information which was not and could not have been reasonably known during the public comment period.

We hereby incorporate by reference all the claims made by MSG, IRATE and related parties in all four lawsuits, including those of illegal precommitment in violation

of CEQA and Brown Act violations, and further incorporate by reference, and request that the City include in this administrative record, all administrative records and evidence submitted in all of those matters. (See collectively **Exh. 10** [operative petitions in the various cases, trial briefs, and Court of Appeal briefs, as applicable].)

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**IX. THE DEIR AND FEIR FAIL ADEQUATELY TO DISCUSS IMPACTS ON SCHOOLS, IN VIOLATION OF CEQA.**

The Project’s administrative record shows no consultation or communication occurred with Lennox Elementary School District, in violation of CEQA. Under Pub. Res. Code §15186(a), “CEQA establishes a special requirement for certain school projects, as well as certain projects near schools, to ensure that potential health impacts resulting from exposure to hazardous materials, wastes, and substances will be carefully examined and disclosed in a negative declaration or EIR, and that the lead agency will consult with other agencies in this regard.”

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Among other things, if the Project is within 1/4 mile of a school site, CEQA requires the lead agency not to certify an EIR unless the lead agency does both of the following: (1) **consult** with the affected school district regarding the potential impact of the project on the school; and (2) notify the affected school district or districts of the project, **in writing**, not less than 30 days prior to approval or certification of the EIR. Guidelines § 15186(b). Obviously, we could not have known that the City and the FEIR would not have complied with this requirement until after the March 24, 2020 close of the official public comment period.

The Applicant listed numerous schools located within 2 miles of the Project site, including several schools from the City of Lennox.<sup>35</sup> Yet the only school-related communications in the Project’s administrative record are about the Inglewood School District’s development fee nexus and calculations that the IBEC Project Applicant must pay to the Inglewood School District.<sup>36, 37</sup> Development fees, however, do not address the *air quality* or *traffic* mitigation issues the Project will cause to the surrounding schools, including to those of the Lennox School District.

<sup>35</sup> See [http://opr.ca.gov/ceqa/docs/ab900/20190124-AB900\\_IBEC\\_AB987\\_NOC\\_Form.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190124-AB900_IBEC_AB987_NOC_Form.pdf)

<sup>36</sup> See [http://ibecproject.com/PREDEIR\\_0000036.pdf](http://ibecproject.com/PREDEIR_0000036.pdf)

<sup>37</sup> See [http://ibecproject.com/PREDEIR\\_0002337.pdf](http://ibecproject.com/PREDEIR_0002337.pdf)

Moreover, the IBEC Project is located within 0.2 miles of the Huerta Dolores Elementary School. (Exh. 41 [Notice of AB 987 Certification Completion; Notice of EIR Completion, and Google Maps of Dolores Huerta Elementary School].)<sup>38</sup> The Elementary School is part of the *Lennox* Elementary School District, serving the needs of about 5,000 young students.<sup>39</sup> (Exh. 42 [Lennox and Huerta web page].) As depicted in the DEIR, p. 3.2-99 (and shown in the figure below), the Project is also adjacent to an Early Childhood Education Facility. Instead of analyzing and discussing the health hazards of the Project's extensive demolition, construction and operational activities to the nearby school children, the EIR's discussion of health hazards is limited to a cursory discussion of cancer risks and a conclusory assertion that the risks are less than significant. (DEIR, pp. 3.2-98 – 3.2-102.) Procedurally and substantively, this is improper under CEQA.

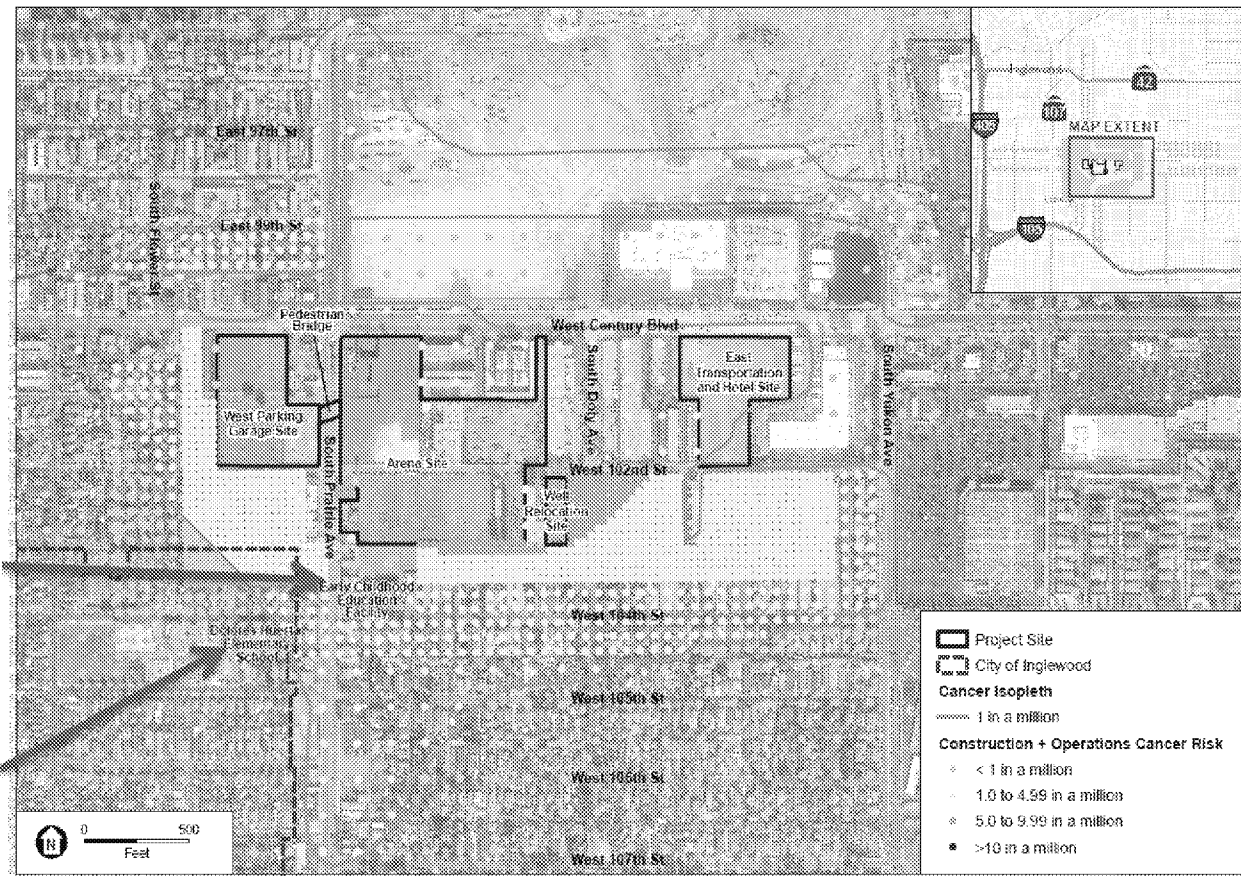
The EIR does not explain or justify the analysis of risks and does not show how those risks disappear in a straight line just above the school. See the figure below from the IBEC DEIR, p. 3.2-99 (arrows pointing to the school/education center):



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<sup>38</sup> The administrative record's document about schools completely omits the Huerta Dolores Elementary School from the list of schools within or adjacent to the Inglewood Unified School District. [http://ibecproject.com/PREDEIR\\_027103.pdf](http://ibecproject.com/PREDEIR_027103.pdf)

<sup>39</sup> See p. 5 of <https://4.files.edl.io/a093/11/15/19/175500-608b5924-96d9-40ce-88db-b2f2b7da78f9.pdf>



SOURCE: TerraServer, 2018; ESA, 2019.

Inglewood Basketball and Entertainment Center

**Figure 3.2-4**  
 Construction + Operations Cancer Risk

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The DEIR and the FEIR do not identify, analyze, or mitigate the traffic impacts on the school and the road closures for purposes of Project construction and operation, the permanent road closure on W. 102nd Street, which will spill over traffic onto adjacent streets including W. 104th Street and thereby present additional health and safety hazards for children, as well as the air pollution associated with the dramatic increase in traffic and the massive construction planned in the area. These omissions are also unacceptable since, based on the Project’s administrative record, the Project’s development fees are calculated based on the needs of the Inglewood Unified School District<sup>40 41</sup>, leaving out

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<sup>40</sup> See, e.g., [http://ibecproject.com/PREDEIR\\_027103.pdf](http://ibecproject.com/PREDEIR_027103.pdf)

<sup>41</sup> Commercial development [http://ibecproject.com/PREDEIR\\_0000036.pdf](http://ibecproject.com/PREDEIR_0000036.pdf);  
 Residential development [http://ibecproject.com/PREDEIR\\_0002337.pdf](http://ibecproject.com/PREDEIR_0002337.pdf)

the impact of the Project on the Lennox Elementary School District, which will be heavily impacted.

Moreover, DTSC responses to our CPRA requests revealed that properties along 102nd Street “within the perimeter” of the Project have EPA records and our further investigation showed asbestos records at one of the problem sites. (Exh. 43 [DTSC Response 1 re Sites; Google Map of all sites; and records of 3818 102nd St.].) Asbestos is known for its dangers effects, especially on children with developing lungs.<sup>42</sup> (Exh. 44 [asbestos dangers to school children].) DTSC’s subsequent responses revealed more sites with DTSC records. (Exh. 45 [DTSC’s Response 2 with list of problem addresses].) The DEIR and FEIR are silent on that information, including the hazards of demolition. The proximity of the sites identified by the DTSC to the elementary school and the Child Education Center makes the DEIR and FEIR’s omissions fatal.

It is the City’s duty to investigate the hazards at DTSC’s listed addresses, to inform the public and decision makers about those in the EIR, to consult with the affected school district and education center, to address and mitigate the Project’s impacts on school children, and now to recirculate a DEIR in full conformance with CEQA.

**X. THE PROJECT CANNOT BE APPROVED DUE TO THE INADEQUACY AND UNENFORCEABILITY OF THE MITIGATION MONITORING PROGRAM.**

The City’s proposed Mitigation Monitoring and Reporting Program (“MMRP”) is flawed and may not be approved. It focuses mainly on *temporary construction* impacts, requires only *noticing* to property owners, even though such notices do not mitigate any impact by themselves, and otherwise makes recommendations rather than provide any evidence that the Project’s *long-term operational* impacts will indeed be mitigated. This critique by us applies to all sections in the MMRP and all mitigation measures.

The AR and the City’s response to Caltrans’ DEIR comments show that the Project Applicant agreed to pay Caltrans over \$1.5 million dollars to reduce impacts on the state highway. The MMRP is silent on this arrangement but provides that the Project Applicant must work with Caltrans and the determination of whether such activities will even be feasible will be made *prior to* the issuance of the “certificate of occupancy”<sup>43</sup>:

<sup>42</sup> <https://ehs.oregonstate.edu/asb-when>

<sup>43</sup> See p. 53 at [http://ibecproject.com/IBECEIR\\_033034.pdf](http://ibecproject.com/IBECEIR_033034.pdf)

“Prior to issuance of a Certificate of Occupancy, Applicant shall work with the City of Inglewood and Caltrans to determine that offramp improvements are feasible and acceptable to Caltrans, and if feasible and acceptable, such improvements shall be completed or adequate security for the estimated amount to complete such improvements provided to the City of Inglewood in a form acceptable to the City.” (MMRP at p. 53.)

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The timing of determining the feasibility of mitigating the impact – prior to *issuance* of a *certificate* of occupancy, i.e., *after* the Project is fully developed – is a gross subversion of CEQA, including but not limited to CEQA requirements to provide enforceable mitigation measures *before* the Project approval, and not to defer mitigation.

The above example is only one of numerous instances of the MMRP’s CEQA violations, warranting the rejection of the MMRP and FEIR as violating CEQA.

**XI. THE STATEMENT OF OVERRIDING CONSIDERATIONS IS CONCLUSORY AND UNSUPPORTED BY EVIDENCE.**

We object to each and every factual claim made in the Statement of Overriding Considerations (“SOC”) as unsupported by substantial evidence. The “findings” are not supported by the data cited. Moreover, to the extent the findings rely on the EIR – which is flawed for all the reasons noted above, including but not limited to flawed or changed baseline assumptions, piecemealing, deferred and unenforceable mitigation – it is further unsupported by substantial evidence.

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Further, to the extent that the EIR, the MMRP, and other Project entitlements are based upon *falsified*, *omitted*, or *concealed* data, such data cannot support findings of overriding considerations.

Beyond the inadequate “findings” the SOC renders the IBEC Project inconsistent with various elements of the General Plan, such as the General Plan’s Land Use Element densities and designations,<sup>44</sup> Circulation Element, Safety Element, and in violation of the consistency requirement under the state Planning and Zoning Law.

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<sup>44</sup> We note that the Project had to show consistency with the General Plan applicable *at the time the* Project Application was deemed complete and the FEIR was prepared. We have further objected to the City’s amendment to the Land Use Element, which rewrote the densities and intensities on June 9, 2020 – *a week before* the Planning

The SOC – in conclusory terms and completely disregarding the public comments of lack of any benefit of the Project to the Inglewood community which will be impacted – declares that the IBEC Project’s benefits will outweigh the 41 adverse environmental impacts. CEQA requires providing evidence of such benefit as to each impact. The SOC does not do so. Also, because the Project and EIR suffer from a lack of the mandatory “accurate, stable and finite project description,” it is impossible for the decision makers to properly balance and weigh the Project’s purported benefits from its detriments when multiple significant Project elements remain unknown and undefined, with those future decisions to be made by the Planning Director out of the public eye, and without public and CEQA review at that time. This is a clear CEQA violation. Stoepthemillenniumhollywood.com, supra, at p. 14

To approve a project with a significant impact, the agency is “required to make findings identifying (1) the “[s]pecific ... considerations” that “make infeasible” the environmentally superior alternatives and (2) the “specific ... benefits of the project [which] outweigh” the environmental harm. (Pub. Res. Code §§ 21002.1, subd. (b), 21081; Guidelines, § 15092, subd. (b).)” Preservation Action Council v. City of San Jose (2006) 141 Cal.App.4th 1336, 1352-1353. Such findings must be supported by substantial evidence and cannot be presumed by courts. Walnut Acres at 1312-1313; Guidelines § 15091(a)-(b). Such evidence must be supported by facts and cannot be an argument, assertion or clearly erroneous. Pub. Res. Code § 21082.2(c); Guidelines § 15384 (a)-(b). The SOC’s failure is a CEQA violation separate from the EIR’s other inadequacies. Guidelines § 15093(b)-(c) (SOC findings “shall be supported by substantial evidence”); Uphold Our Heritage v. Town of Woodside (2007) 147 Cal.App.4th 587, 603 (record does not support infeasibility finding). Moreover, such infeasibility must be *legal* (i.e., legal restraints), rather than *financial* (as in not financially profitable).

The City’s findings of infeasibility to mitigate each and every one of the 41 adverse environmental impacts lack substantial evidence that it was infeasible to build a smaller Project or to develop the City’s land with less intensive uses. The findings are also clearly erroneous, as they rely on the same illusory mitigation measures as in the EIR or in the latest MMRP.

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Commission’s scheduled June 17, 2020 hearing on the IBEC Project – under the guise of merely “clarifications.” We incorporate by reference all of our objections to the City’s eleventh-hour rewriting of the General Plan’s Land Use Element to allegedly make it consistent with the IBEC Project. Again the tail wags the dog.



The true nature and scope of the Project, and its alleged benefits, cannot be determined based on the faulty DEIR and FEIR, and thus the necessary balancing of competing issues required to lawfully support an SOC cannot be found. An SOC cannot properly be adopted, and should be rejected, along with the entirety of the Project and the proposed FEIR. In the words of the Court:

“The EIR is intended to furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much they – and the environment – will have to give up in order to take that journey. As our Supreme Court said in Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 283 [118 Cal.Rptr. 249, 529 P.2d 1017], ‘[t]he purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind.’” Natural Resources Defense Council, Inc. v. City of Los Angeles (2002) 103 Cal.App.4th 268, 271-272.

**XII. THE PROJECT IS ILLEGAL DUE TO ITS FAILURE TO SUBSTANTIATE THE NEED FOR SPECIFIC PLAN AMENDMENTS AND DISCRIMINATORY SPOT ZONING.**

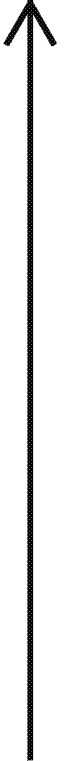
The Project includes Specific Plan amendments and the following action:

“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.” (DEIR, p. 2-89.)

The proposed “exclusion” is improper as it constitutes: (A) an unsupported variance; and (B) discriminatory spot zoning.

**A. The Specific Plan Amendment Amounts to a Variance Without Required Grounds to Justify It.**

The DEIR and FEIR do not specify why exactly the sites must be excluded or why the Project will be inconsistent with the Specific Plan, short of mentioning wider setback requirements under the Specific Plan, i.e., 25-foot setbacks along South Prairie and 15-foot setbacks along West 102nd street and the need to “remove” portions of the IBEC



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Project from the Specific Plan, allegedly to ensure consistency with both the Specific and General Plans. (DEIR, p. 3.1-13, pdf p. 263.)

The DEIR description, along with the fact that the Specific Plan amendment seeks to “remove the portions of the Project site” from the Specific Plan to obtain consistency with the General Plan, shows that the “Specific Plan amendment” is in reality a misnomer. In essence, the City is trying to de facto “exempt” the Project lots from certain Specific Plan requirements. This is also evidenced by the fact that on May 4, 2020, long after release of the Project DEIR on December 27, 2019, the Project Applicant presented its own draft of the Specific Plan amendments, which stated: “By doing so the City intends, as provided below, that if developed in connection with the IBEC Project the IBEC Project Related Parcels shall be excluded from the HBP Specific Plan, but otherwise the provisions of the HBP Specific Plan shall apply.”<sup>45</sup> (Exh. 46 [Applicant’s Draft of Specific Plan Amendments].) As such, what is proposed is not a Specific Plan Amendment but rather a *variance* for the Project sites only. In any event, whether denominated a specific plan amendment or a variance, this entitlement triggers various required findings, including a necessary finding of “unnecessary hardship.”

“Unnecessary hardship” is a term of art generally used in the context of evaluating a zoning variance. For example, under the Los Angeles Municipal Code, no variance may be granted unless “the strict application of the provisions of the zoning ordinance would result in practical difficulties or unnecessary hardships inconsistent with the general purposes and intent of the zoning regulations.” (West Chandler Boulevard Neighborhood Assn. v. City of Los Angeles (2011) 198 Cal.App.4th 1506, 1514, fn. 4, 130 Cal.Rptr.3d 360.) Although the test includes both “practical difficulties” and “unnecessary hardships,” the focus should be on “unnecessary hardships” and not “practical difficulties,” which is a lesser standard. (Stolman v. City of Los Angeles (2003) 114 Cal.App.4th 916, 925, 8 Cal.Rptr.3d 178; Zakessian v. City of Sausalito

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<sup>45</sup> See the Applicant’s draft at [http://ibecproject.com/IBECEIR\\_031887.pdf](http://ibecproject.com/IBECEIR_031887.pdf) The Applicant’s draft also shows that the Specific Plan Amendment is expressly dependent on the concurrent amendment of the General Plan. This is to ensure that the Specific Plan Amendment is consistent with the General Plan. However, such an arrangement of amending the General Plan to find consistency of it with the subsequent Specific Plan Amendment violates the state planning and zoning laws requiring the *action’s* consistency *with* the General Plan, not the opposite. “The tail does not wag the dog. The general plan is the charter to which the ordinance must conform.” Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 389.

(1972) 28 Cal.App.3d 794, 799, 105 Cal.Rptr. 105.)” Walnut Acres Neighborhood Assn. v. City of Los Angeles (2015) 235 Cal.App.4th 1303, 1305

“Although the developer argued the unnecessary hardship was based on its purported lost “economy of scale,” no evidence supported that claim. The record contained no evidence that following the zoning regulations and building a less dense facility would cause either financial hardship or unnecessary hardship. We therefore affirm the trial court’s judgment requiring the City to rescind its approval of the proposed eldercare facility.” Walnut Acres Neighborhood Assn. v. City of Los Angeles (2015) 235 Cal.App.4th 1303, 1306.

Similarly, the Inglewood Municipal Code § 12-97.1 sets out four (4) grounds that must be met to approve a variance:

“Before any variance may be granted, findings establishing the factual existence of each of the following grounds must be made:

- (1) That there are **exceptional** or **extraordinary circumstances** or conditions applicable to the property involved, including, but not limited to, size, shape, topography or surroundings, that do not apply generally to other property or uses in the same zone and vicinity; and
- (2) That the strict application of the zoning provisions of this Chapter would result in **practical difficulties** or **unnecessary hardships** inconsistent with the general purpose and intent thereof (the **costs** of providing required improvements or of correcting violations **shall not** constitute such hardship); and
- (3) That the granting of such variance will not be materially detrimental to the public health, welfare or safety or injurious to the property or improvements in such zone and vicinity in which the property of the applicant is located; and
- (4) That the granting of such variance will not conflict with the provisions of the comprehensive general plan.” (Exh. 47 [Inglewood Municipal Code § 12-97]; emph. added.)



The IBEC DEIR lacks any analysis or any findings to establish the variance grounds listed above.

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Moreover, the EIR lacks information about how the Project is inconsistent with its encompassing Specific Plan or the larger General Plan. This missing information is fatal for the FEIR certification for the following reasons:

- 1) The noted 25- and 15-foot setbacks under the Specific Plan are required to provide for open space and to allow for future street widening. The narrow setbacks left by the Project will significantly limit the City's options.
- 2) The EIR provides no good faith disclosure and no baseline of what is appropriate under the Specific Plan and General Plan and therefore provide no possibility for the public to identify the extent of proposed changes and associated impacts.

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The EIR and proposed Project approvals not only lack information about how the Project is inconsistent with the Specific Plan, but also misses the important findings necessary to approve the Specific Plan amendment under state law.

“The planning commission’s summary of ‘factual data’—its apparent ‘findings’—does not include facts sufficient to satisfy the variance requirements of Government Code section 65906.

“As we have mentioned, at least two sets of legislative criteria appear applicable to the variance awarded: Government Code section 65906 and Los Angeles County Zoning Ordinance No. 1494, section 522. The variance can be sustained only if All applicable legislative requirements have been satisfied. Since we conclude that the requirements of section 65906 have not been met, the question whether the variance conforms with the criteria set forth in Los Angeles County Zoning Ordinance No. 1494, section 522 becomes immaterial.” Topanga Assn. for a Scenic Community v. County of Los Angeles (1974) 11 Cal.3d 506, 518.

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The DEIR must be supplemented with information about the inconsistency of the Specific and General Plans along with analysis of the proposed changes, and recirculated.

The City may not approve the changes to the Specific Plan or remove the Project sites from it without the findings required by the Inglewood Municipal Code. Doing so would be a violation of the Inglewood Municipal Code, State Planning and Zoning Law, and CEQA.

**B. The Specific Plan Amendment Results in Discriminatory Spot Zoning.**

The Project’s Specific Plan amendment removing the Project sites from the Specific Plan and essentially exempting just the Project site lots from the Specific Plan requirements creates impermissible spot zoning without any justifiable public interest or benefit for the *Inglewood* community. Stated otherwise, even though the City of Inglewood through the Project will attract numerous people from *other* places for games and events and will become an entertainment center for *visitors*, the Project will bring no actual interest or benefit to Inglewood’s disadvantaged community but only the brunt of the Project’s 41 adverse environmental impacts.

The lack of public benefit or interest is particularly the case here, as the Specific Plan requires 25-foot setbacks on South Prairie St. and 15-foot setbacks on 102nd Street and where the Project significantly reduces the setbacks on South Prairie and vacates the portion of 102nd street around the Project area:

“South Prairie Avenue – In the vicinity of the project, the street has continuous sidewalks with widths varying from about 5 to 13 feet. Sidewalks **immediately adjacent to the Project Site are less than 5 feet**, and adjacent to an 8-foot landscaped area that also contains signage and utilities. Striped crosswalks are provided at signalized intersections, and most curb ramps do not have truncated domes.

“West 102nd Street – Sidewalks on West 102nd Street near the Project Site range from 5 to 7 feet. Signage and utilities **obstruct the pedestrian path** of travel in **several locations.**” (DEIR, p. 3.14-50, pdf p. 1134, emph. added.)

The *sidewalk* being the public right of way is *distinct* from *setbacks* that the Applicant itself must provide on the private property; therefore, the setbacks that the Project must provide should not count the 5-foot or less sidewalk towards its own setbacks. The setback reductions – and essentially the violations of the Specific Plan – are contrary to the public benefit for both the visitors of the Project and the residents of the Project’s surrounding area.



The California Constitution, Article 1, Section 7(b) provides: “A citizen or class of citizens may not be granted privileges or immunities not granted on the same terms to all citizens.” Under this provision, a “privilege” includes “a particular and peculiar benefit or advantage enjoyed by a person, company, or class beyond the common advantage of other citizens.” Diagh v. Schaffer (1937) 23 Cal.App.2d 449, 454-455, unrelated language clarified in Johnson v. Superior Court (1958) 50 Cal.2d 693, 699. The case of Foothill Communities Coalition v. County of Orange (2014) 222 Cal.App.4th 1302, 1313 (Foothill) holds that to create a privileged “island of property with less restrictive zoning in the middle of properties with more restrictive zoning is spot zoning.” Such discriminatory zoning can only be justified by a “*substantial* public need.” Foothill, 222 Cal.App.4th at 1314 (emphasis added).

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Without citing to *any* “public need” and in defiance thereof, the Project proposes significant changes and amendments to benefit the *private needs* of the IBEC Project’s Applicant. The City has not made findings of substantial public need, nor can it do so with the controversial Project objected to by many in Inglewood, by interested groups, and even legislators. (Exh. 11 [AB-987 comments].)

Where there is discrimination, where the classification and resulting benefits given to the privileged “island” are not related to particular characteristics of the site that are not shared by the surrounding land, then a higher standard of review is applied, as in Foothill. Because it involves discrimination, spot zoning “entails a ‘more rigorous form of judicial review.’” Avenida San Juan Partnership v. City of San Clemente (2011) 201 Cal.App.4th 1256, 1268, quoting Ehrlich v. City of Culver City (1996) 12 Cal.4th 854, 900 (Mosk, J., conc.) While Ehrlich involved restrictive spot zoning, the principle should apply equally to preferential spot zoning, which is, in essence, discrimination against like-situated properties.

For these additional reasons, the Specific Plan amendments should not be approved.

### **XIII. THE PROJECT VIOLATES THE SUBDIVISION MAP ACT.**

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The Project’s proposed actions for approval include:

- “• Approval of subdivision map(s) or lot line adjustments to consolidate properties and/or adjust property boundaries within the Project Site.” (DEIR, p. 2-89.)

In fact, the Project will need to consolidate numerous lots and *vacate* portions of City streets at W. 101st and W. 102nd Street and encroach on public right of way. The requested approvals also include:

- “• 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 right-of-way to encroach on City streets.” (DEIR, p. 2-89, *emph. added.*)

The Project’s proposed subdivision/tentative tract map(s) should not be approved because it violates the Subdivision Map Act, Govt. Code §§ 66410 et seq.

Pursuant to Govt. Code § 66473.5:

“No local agency shall approve a tentative map, or a parcel map for which a tentative map was not required, unless the legislative body finds that the proposed subdivision, together with the provisions for its design and improvement, is consistent with the general plan required by Article 5 (commencing with Section 65300) of Chapter 3 of Division 1, or any specific plan adopted pursuant to Article 8 (commencing with Section 65450) of Chapter 3 of Division 1.

“A proposed subdivision shall be consistent with a general plan or a specific plan only if the local agency has officially adopted such a plan and the proposed subdivision or land use is compatible with the objectives, policies, general land uses, and programs specified in such a plan.” (*Id.*)

In addition, Govt. Code § 66474 mandates that the agency make specific findings, prior to the approval of a tentative map or parcel map:

“A legislative body of a city or county **shall deny** approval of a tentative map, or a parcel map for which a tentative map was not required, if it makes any of the following findings:

- (a) That the proposed map is not consistent with applicable general and specific plans as specified in Section 65451.



- (b) That the design or improvement of the proposed subdivision is not consistent with applicable general and specific plans.
- (c) That the site is not physically suitable for the type of development.
- (d) That the site is not physically suitable for the proposed density of development.
- (e) That the design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.
- (f) That the design of the subdivision or type of improvements is likely to cause serious public health problems.
- (g) That the design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision. In this connection, the governing body may approve a map if it finds that alternate easements, for access or for use, will be provided, and that these will be substantially equivalent to ones previously acquired by the public. This subsection shall apply only to easements of record or to easements established by judgment of a court of competent jurisdiction and no authority is hereby granted to a legislative body to determine that the public at large has acquired easements for access through or use of property within the proposed subdivision.” (Id.; emph. added.)

Because of its 41 non-mitigated significant adverse environmental impacts – including but not limited to the impacts on traffic and pedestrian circulation, open space, displacement of numerous residential and commercial structures (including through the alleged right to use eminent domain), air quality and greenhouse gas emissions<sup>46</sup>

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<sup>46</sup> We also direct your attention to the June 12, 2020 decision of the California Court of Appeal in Golden Door Properties v. County of San Diego (2020 WL 3119041). This





associated with both the Project construction and its operation – the Project presents a serious public hazard and substantial environmental damage to the Inglewood community and to nearby schools and school children.

Moreover, Subdivision Map approval is subject to CEQA, and we incorporate our CEQA challenges by reference for purposes of the Subdivision Map Act and all other land use applications and potential approvals.

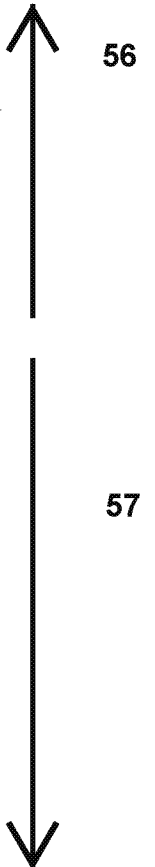
The DEIR admits that the Project is inconsistent with the Specific Plan and seeks to amend it, in order to avoid such inconsistency. See supra. The DEIR also admits that the Project is inconsistent with the General Plan and therefore improperly seeks amendments thereto. Id. See also supra (General Plan Amendments and Piecemealing).

The Project – with its planned development, its proximity to other similar arenas, and its adverse impacts on and/or displacement of numerous commercial and residential properties involved<sup>47</sup> – is not physically suitable or consistent with the intensity of development for the area. The Project’s inconsistency with the area where it is proposed is also evidenced by the City’s piecemealing efforts to increase the building intensity and density in the General Plan, in large part to benefit the Project. See Sec. VII.E, supra (General Plan Amendments). Friends of “B” Street v. City of Hayward (1980) 106

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case also requires the City to deny certification of the FEIR and, instead, to amend and recirculate a new DEIR for public and agency review. Among other things, and applicable to the inadequate and illegal EIR herein, the Golden Door opinion eviscerates the validity of a GHG mitigation measure that depends on obtaining offsets from a registry registered with CARB. The Court in detail explained why such offsets are not as effective as compliance-grade offsets used in the cap-and-trade program. The Project and its EIR and MMRP’s commission of these same errors is improper and incurable without recirculation of a new DEIR. The opinion also has a helpful summary of the law on cumulative impacts, alternatives, and deferred mitigation, especially why deferred mitigation (of GHG mitigation measures) without clear standards and performance criteria is impermissible. Again, the Project EIR and MMRP fail as to these critical issues. Finally, the opinion upheld the trial court’s requirement for an environmental justice (“EJ”) analysis as part of CEQA. The EJ “analysis” in the Project EIR is at best tissue thin, and as discussed above, actually fails to properly disclose, assess and mitigate impacts from the City’s concurrent proposed EJ General Plan Amendment, which has been egregiously piecemealed out of the instant EIR.

<sup>47</sup> See Exh. 10, Case No.: BS170333 (IRATE FAP, Exhibit E).



Cal.App.3d 988, 998 (“Such consistency is expressly required by Government Code section 66473.5”).

Section 6 of the proposed Ordinance violates the Subdivision Map Act as it purports to allow unlimited ministerial lot line adjustments, involving five or more contiguous parcels, with one adjustment starting before another adjustment has been finalized with a recorded deed, and without specific approval of the local agency. The Subdivision Map Act excepts lot line adjustments only in compliance with Government Code Section 66412(d). Section 6 of the Ordinance conflicts with the scope of exception for lot line adjustments and is preempted by the Subdivision Map Act. Lot line adjustments granted pursuant to Section 6 of the Ordinance, therefore, would be illegal.

Finally, because many of the Project properties are former Inglewood Redevelopment Agency properties and/or Successor Agency properties, any lot line adjustments would have to be approved by the State Department of Finance or Real Estate. The City cannot assume either the granting, or the timing for granting, of such approvals by the DOF. If the City attempts to avoid this oversight requirement, this will subject the City and the Project to further legal challenge.

*We hereby request notice of any and all applications for lot line adjustments for or in connection with the Project.*

The Project and its Tentative/Parcel Map must be denied for violation of the Subdivision Map Act.

#### **XIV. VIOLATION OF THE PROVISIONS UNDER SURPLUS LAND LAWS.**

The Project approvals listed in the Notice of Preparation include DEIR Section 2.6, which states:

- “• Approval of a Disposition and Development Agreement (DDA) by the City of Inglewood governing terms of disposition and development of property.” DEIR, p. 2-89.)

The Project is proposed in most part (23 acres out of 28) on public land. The Project has been challenged and the City (its various departments and related agencies) and the Project Applicant were sued for violation of applicable laws governing the disposition of surplus land. (Exh. 10 [MSG pleadings related to surplus land].) The City’s arguments in court to counter petitioner’s claims that the lots could not be offered



for residential affordable housing purposes first because of the FAA regulations and noise. However, the Project does include a residential structure – a hotel, another 14-story hotel is proposed in close proximity and across from the Project as part of the Hollywood Park Redevelopment Project, and the latest draft of the Disposition and Development Agreement includes a provision that the FAA restrictions should not bar the development of the Project as outlined in the DDA (i.e., including the hotel).

In view of this conflicting new and different evidence, not before the Court at the time, we reinstate the claims and allegations in the respective pleadings by MSG Forum. (See **Exh. 10** [collective pleadings].)

**XV. THE DISPOSITION AND DEVELOPMENT AGREEMENT IS BASED ON FRAUD AND IS VOID AB INITIO.**

As the law prescribes and the Supreme Court has held since the founding of this state: “Fraud vitiates all transactions into which it enters.” 34A Cal. Jur. 3d Fraud and Deceit § 4, Simmons v. Ratterree Land Co. (1932) 217 Cal. 201, 203-204.

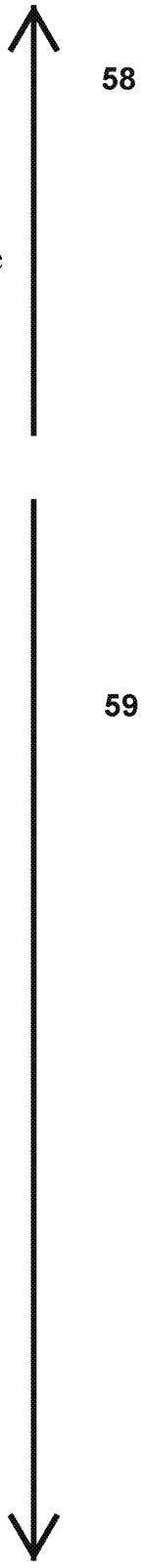
Ample evidence exists – including evidence brought before the Court and found valid by the Court – that the Project itself commenced based upon fraudulent representations and concealment by the City and particularly by Mayor Butts as to what would be proposed on the lots the City purchased with the FAA grant. Specifically, Mayor Butts misrepresented to MSG Forum – and to the public – that the area would be used to build a technical or industrial park. (**Exh. 26** [fraud case against the City and Mayor Butts].)

There is also evidence that the area, much of which is vacant and proposed to be used for the Project, was previously home to numerous apartment buildings, whose tenants were relocated and their residences demolished. The City has been setting the stage up for the Clippers Project long before the community became aware of it. Hundreds of people were relocated because of the allegedly objectionable air plane noise, whereas the Clippers arena will bring in numerous people and even hotel guests despite those objections.

Tellingly, the latest draft of the Disposition and Development agreement<sup>48</sup> provides that the parcels that the City had previously acquired with the FAA grant and are therefore subject to developmental restrictions will be conveyed to the Project

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<sup>48</sup> See at [http://ibecproject.com/IBECEIR\\_032579.pdf](http://ibecproject.com/IBECEIR_032579.pdf)



Applicant with those same restrictions. However, the agreement then undermines this by providing: “However, **no** such covenants, conditions, **restrictions** or equitable servitudes **shall prohibit** or limit the development of the Project Site as permitted by the Scope of Development and this Agreement.” (Disp. Agreement, Section E [283]; *emph added.*)

Also, due to the above-quoted carve-out related to the encumbrances and more specifically FAA restrictions, the City’s justification that the Project site is not suitable for residential structures because of the FAA grant<sup>49</sup> conflicts with the IBEC Project’s proposed hotel – a residential structure (**Exh. 48** [Inglewood Municipal Code § 8-121]), about which no specific information is provided in the EIR. This City justification – which helped the City counter claims of violation of the surplus land laws – is also sophistry in view of the City’s approval of a 14-story hotel in the vicinity of the Project as part of the Hollywood Park Redevelopment Project.<sup>50</sup>

Finally, the DDA is illegal and fraudulent because it sets the stage for eminent domain action by the City to condemn private properties – all financed by the Project Applicant and for the latter’s *private* purposes. The DDA further provides that – after eminent domain is exercised – all the properties taken by eminent domain will be conveyed to the Project Applicant. This is a naked abuse of the power of eminent domain (which power cannot be lawfully exercised here). The alleged public purpose for the City’s intended use of eminent domain is pretextual and a transparent prevarication.<sup>51</sup>

Development of the Project and similar stadiums also increases nearby properties’ rents and real property values. We believe that evidence that certain City officials (and decision makers), or those related to them such as family members, have been purchasing properties and expect a prospective economic advantage from approval of the Project. This situation can qualify as a “bribe,” and constitute a further basis for challenging any ostensible right to take.

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<sup>49</sup> See FAA Grant Agreement at [http://ibecproject.com/IBECEIR\\_031082.pdf](http://ibecproject.com/IBECEIR_031082.pdf)

<sup>50</sup> See pdf pp. 12 and 15 at <https://www.cityofinglewood.org/DocumentCenter/View/108/II-Project-Description-PDF>

<sup>51</sup> We have previously objected to the City’s stated intended use of eminent domain to take private properties for the benefit of Murphy’s Bowl and the Project, particularly our client’s property at 10212 South Prairie Ave. We expressly reserve all objections thereto, which will be more fully raised if/when the City proceeds to a resolution of necessity hearing. (*See, e.g., Exh. 49* [April 23, 2020 letter].)



Fraud vitiates any transaction and any potential approval of the DDA is therefore *void ab initio*. The City's approval of the DDA will also lead to the violation of our client's civil rights, and the civil rights of similarly situated property and business owners.

Finally, the DDA should not be approved as it is tainted and illegal due to the City's precommitment to the Project through its ENAs in violation of CEQA, the City's flawed CEQA findings, as well as the City's sanctioning of the illegal *rewriting* of the City's General Plan, Specific Plan, and the overlay zone to accommodate the Project.

**XVI. CONCLUSION.**

For all of the foregoing reasons, the FEIR must be rejected, the Project applications and entitlements denied, and a new and legally compliant DEIR circulated prior to any further consideration of the Project.

Very truly yours,

*/s/ Robert P. Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl  
Encls.



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**Note to Reader:**

**All Exhibits attached to this letter are a part of  
the Administrative Record and can be found at  
[ibecproject.com](http://ibecproject.com)**

**The Silverstein Law Firm, APC**

**June 16, 2020**

**Objections to IBEC Project, DEIR and FEIR;**

**State Clearinghouse No. 2018021056**

**EXHIBIT 1**

**From:** Dev Bhalla  
**To:** Mindala Wilcox; ibecproject; Evangeline Lane  
**Subject:** To the Inglewood Planning Commission public hearing city of inglewood scheduled for June 17, 2020 IBEC  
**Date:** Tuesday, June 16, 2020 11:02:36 PM

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To the Inglewood Planning Commission

public hearing city of inglewood

scheduled for June 17, 2020

Dear All,

In reference to Item #5 under Public Hearing.

“promote the enjoyment and recreation of the public by providing access to the City’s residents in the form of spectator sports”

Please let us know what percentage of this “City’s residents,” specifically Inglewood’s residents will be able to afford the for profit tickets that often sell through third parties for hundreds of dollars? In the current planning commissions scenario the purchasing of a expensive ticket is required for “enjoyment and recreation.” The initial quote above implies something all residents can enjoy like a public park, free of cost. This is a special privilege that is being given to a private business by the city, buried in mountains of documents.

Has there been a study conducted to see what percentage of Inglewood residents will be able to afford to go to these basketball games? I am sure it will not be affordable for the majority of the residents who will of course be effected by the traffic, congestion, trash and increase in living expenses.

Why have I never been informed by the city of their intentions?

Why has the warehouse to the east of my building not been included in the redevelopment? Why have the businesses directly north of my building not been included? According to the project site aerial map they have deliberately drawn around them. What side deal has been cut?

Attachment No. 4 Zone Change and Zoning Code Amendment Findings

“All properties to be rezoned for consistency with the General Plan Land Use Element are owned by the City of Inglewood or the City of Inglewood as Successor Agency to the former Inglewood Redevelopment Agency (City as Successor Agency) and are currently vacant.”

Is the above amendment referring to my property to? If so, it is obviously not true.

Please clarify the plans for my building?

I will be calling in to participate in the hearing. If you don’t hear from me during the meeting you will know that yet another obstacle has been put in my way, not allowing me to be there due to the limitations of your technology.

Please confirm receipt of this email via reply.

Respectfully,

Dev Bhalla  
Owner of:  
3838 w. 102 st.  
Inglewood, CA  
310-770-9660

**Note to Reader:**

**All Exhibits attached to this letter are a part of  
the Administrative Record and can be found at  
[ibecproject.com](http://ibecproject.com)**



801 S. Grand Ave. -  
11<sup>th</sup> Floor  
Los Angeles, CA 90017

# FISHER & TALWAR

PROFESSIONAL LAW CORPORATION

PH (213) 891-0777  
FAX (213) 891-0775  
www.fishertalwar.com

J. Jamie Fisher, Esq.  
jfi@fishertalwar.com

June 16, 2020

Via Email (mwilcox@cityofinglewood.org)

City of Inglewood  
Economic and Community Development Department  
Special Planning Commission  
Inglewood City Hall, Council Chambers, Ninth Floor  
One West Manchester Boulevard  
Inglewood, CA 90301

**Re: Objections on Behalf of Dev and Roopa Bhalla to Proposed Actions Related to Inglewood Basketball and Entertainment Center to be Considered at June 17, 2020 Special Planning Commission Meeting of the Economic and Community Development Department of the City of Inglewood**

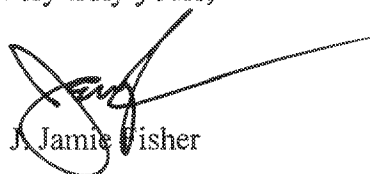
Dear Commissioners and Staff:

We have received notice of the meeting of the Special Planning Commission of the Economic Community Development Department of the City of Inglewood ("SPC") scheduled for June 17, 2020 wherein the SPC plans to take certain actions set forth in the Agenda relating to the Inglewood Basketball and Entertainment Center ("IBEC").

This purpose of this letter is to provide written objection on behalf of Dev and Roopa Bhalla (the "Bhallas"), owners of the improved property situated at 3838 W. 102 St., Inglewood, CA 90303 ("Subject Property") to the actions proposed in the City of Inglewood Agenda relating to the above referenced meeting. Accordingly, we request that this letter be included as part of the formal record for said Agenda.

Specifically, the Ballas object to Agenda Items 5(A)-5(F), inclusive, to the extent any such proposed actions adversely affect, *inter alia*, the zoning, utility, developability, salability and/or otherwise reduce the value of the Subject Property in any way. Additionally, since the Subject Property has been designated as part of the IBEC project area and presumably will be acquired by the City in the future in connection with said project, any action taken by the City to diminish the value of the Subject Property or otherwise adversely affect same prior to its acquisition of the property are in bad faith and are in violation of California law.

Very truly yours,



J. Jamie Fisher

**From:** [Evangeline Lane](#)  
**To:** [Mindala Wilcox](#)  
**Subject:** FW: Public Records Request - Planning Commission Agenda  
**Date:** Wednesday, June 17, 2020 5:14:35 PM

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Hi Mindy;

This just received from Ms. Hebert.

E.

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**From:** msmelissahebert@gmail.com [mailto:msmelissahebert@gmail.com]  
**Sent:** Wednesday, June 17, 2020 4:31 PM  
**To:** Jacquelyn Gordon <jgordon@cityofinglewood.org>  
**Cc:** Evangeline Lane <elane@cityofinglewood.org>; Aisha Thompson <aphillips@cityofinglewood.org>  
**Subject:** Re: Public Records Request - Planning Commission Agenda

Please provide accompanying staff report related to this item that was provided to any member of the public who sent comment on this matter to the persons identified as receiving comments related to this item.

Melissa

Sent from my iPhone

On Jun 17, 2020, at 2:09 PM, Jacquelyn Gordon <jgordon@cityofinglewood.org> wrote:

Hello Melissa,

I have attached a copy of the response to your request.

*Jacquelyn Gordon*

Staff Assistant: City of Inglewood  
City Clerk's Office

One Manchester Boulevard, 1<sup>st</sup> Floor, Inglewood, CA 90301  
Phone 310 412.8809 Fax 310 412.5533

[www.CityofInglewood.org](http://www.CityofInglewood.org)

<image003.jpg>

**From:** Melissa Hebert [mailto:[msmelissahebert@gmail.com](mailto:msmelissahebert@gmail.com)]  
**Sent:** Thursday, June 11, 2020 11:16 AM  
**To:** Evangeline Lane <[elane@cityofinglewood.org](mailto:elane@cityofinglewood.org)>; Aisha Thompson <[aphillips@cityofinglewood.org](mailto:aphillips@cityofinglewood.org)>  
**Cc:** Jacquelyn Gordon <[jgordon@cityofinglewood.org](mailto:jgordon@cityofinglewood.org)>  
**Subject:** Public Records Request - Planning Commission Agenda

Good morning Evangeline & Aisha!

I am seeking a copy of the planning commission agenda for June 17th meeting to approve the Clippers arena?

Melissa  
<Melissa Hebert 20-03 Document.pdf>

**From:** [Jasmine Lee](#)  
**To:** [Mindala Wilcox](#)  
**Cc:** [nagkyunglee](#)  
**Subject:** Local Property Owner Inquiry about the Inglewood Basketball and Entertainment Center Building Project  
**Date:** Thursday, June 18, 2020 4:58:57 PM

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Hello Manager Wilcox,

I am emailing on behalf of my father, Charles Lee the property owner of the California Prairie Plaza LLC (10300 S. Prairie Ave, Inglewood). He has a Yahoo email, and from the call I placed to your office, I learned that there is a firewall for Yahoo emails, so I am passing this along through my gmail account, with him Cc'ed.

"I had several questions in regards to the Inglewood Basketball and Entertainment Center Building Project.

1. My property is located on the cross of W. 103rd St and S. Prairie St., and I would like to know if the Project site overlaps into it.
2. How will businesses in that specific area be affected by the construction and project? The tenants of the plaza are concerned about the project's proximity to their location.
3. Who is the point person in regards to communicating with local businesses for their questions?
4. Is there a start date to the Project? And what is it?

Thank you, and I hope to hear back from you soon.

Sincerely,  
Charles Lee"

Best,  
Jasmine Lee

**THE SILVERSTEIN LAW FIRM**

*A Professional Corporation*

215 NORTH MARENGO AVENUE, 3RD FLOOR  
PASADENA, CALIFORNIA 91101-1504

PHONE: (626) 449-4200 FAX: (626) 449-4205

ROBERT@ROBERTSILVERSTEINLAW.COM  
WWW.ROBERTSILVERSTEINLAW.COM

June 19, 2020

**VIA EMAIL [kcampos@cityofinglewood.org](mailto:kcampos@cityofinglewood.org)  
[mpan@cityofinglewood.org](mailto:mpan@cityofinglewood.org)**

Kenneth R. Campos, City Attorney  
Michael Pan, Sr. Deputy City Attorney  
City of Inglewood  
1 West Manchester Blvd.  
Inglewood, CA 90301

Re: Response to Demand for Deletion of Alleged Privileged Documents  
IBEC Project SCH 2018021056

Dear Mr. Campos and Mr. Pan:

I am in receipt of your June 17, 2020 letter. As a preliminary matter, please keep Naira Soghatyan, Esther Kornfeld and Veronica Lebron of my office copied on all communications, especially as most of us are working remotely. I have copied them in the cover email of this letter.

Regarding the substance of your letter, I personally have not seen or read the document you reference in your June 17, 2020 letter. I understand that Ms. Soghatyan in reviewing documents publicly posted by the City on its website and distributed to the general public as part of an open meeting agenda item saw the subject staff report and attachments.

I have now reviewed the staff report itself (not the subject attachment). As an initial matter, in addition to the fact that the document in question was published to the world by the City for at least several days, and perhaps also made physically available to the public, the staff report shows that the entire document that was uploaded for public access was vetted by multiple City officials and staff, as notated with initials and signatures, including from the City Manager and City Attorney.

However, the purpose of this letter is to acknowledge receipt of your letter and to inform you that although based on my preliminary understanding, the document in

Kenneth R. Campos, City Attorney  
Michael Pan, Sr. Deputy City Attorney  
City of Inglewood  
June 19, 2020  
Page 2

question does not appear to qualify as privileged on various grounds, nonetheless, we will not disseminate it until we have had an opportunity to review in more detail your letter and the cases you have cited. It is my expectation to be able to more substantively respond to you in the next approximate week.

This is not a concession that the document in question was properly claimed to be privileged or, that there was not a waiver of any potential privilege by virtue of the City's broad public dissemination of the materials. However, we will review the issues further and get back to you regarding same.

Can you provide me with any anticipated dates for the City Council's final hearing and consideration of the IBEC project entitlements and FEIR certification?

As always, please contact me with any questions. Thank you.

Very truly yours,

*/s/ Robert P. Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl

cc: Naira Soghatyan, Esq. (Naira@RobertSilversteinLaw.com)  
Esther Kornfeld (Esther@RobertSilversteinLaw.com)  
Veronica Lebron (Veronia@RobertSilversteinLaw.com)

**From:** [Sheri Davis](#)  
**To:** [George Dotson](#)  
**Subject:** CLIPPERS ARENA  
**Date:** Sunday, June 28, 2020 7:22:50 PM

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We in Inglewood will be silent no more. The Mayor, councilman, have been missing in action during this pandemic. We have to get information from Mayor of Los Angeles to get the reports on status of Inglewood virus. Council meetings are on line that limit us the visibility and ability to be have our concerns expressed.

If you, councilman, cannot properly represent our District's needs and hear our concerned voices the votes for you will be silent.

We have serious concerns about Clippers Arena such as increased traffic, environmental impact, e.g. health, residents forced out of their housing and closing of small businesses. How is this to the benefit of Inglewood? Increased property taxes and sales taxes??

We need to be heard. There is power in our vote, and we use it at the polls.

Concerned Inglewood Resident for 30+ years

Sent from AT&T Yahoo Mail on Android

**From:** Tina Pool  
**To:** George Dotson  
**Subject:** Clippers Arena  
**Date:** Sunday, June 28, 2020 12:55:25 PM

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Mr Dotson

I am against the new Clippers Arena. If they want to play in Inglewood, they can play in the Forum since Balmer owns it now.

I am an original owner in Carlton Square; this was my first time living in Inglewood. I moved here because of its convenience and I liked the idea of moving into a brand new house. I also liked the small town atmosphere, where there wasn't a lot of congestion and noise – a bedroom community. When I came, I made a choice and was prepared to contend with Hollywood Park and the Forum.

Since then, the only choice I was given was the Walmart on the corner of Pincay and Prairie, which I and my neighbors voted down. Nobody asked me about the Hollywood Park casino or the new football stadium. I was surprised to see how close the stadium is to my home – guess I should have paid more attention, but I thought it would be where the racetrack was. I continue to see changes that will affect my daily life. Now, with the congestion that I expect and the prices for homes, I am seriously considering moving out of Inglewood.

Now, on top of all this, you want to add a basketball arena. I think you are making Inglewood a less desirable place for its residents to want to stay. I realize that all of Inglewood will not be as affected as I am, but I would appreciate consideration for those of us who have been subjected to this arbitrary (or is it?) discrimination. We happen to be the ones who own our homes, keep them up, pay our taxes, and vote.

I am asking that you rescind the approval to build the new Clippers Arena.

Thank you

Tina Pool



From: Veronica Lebron  
To: vlebron@silversteinlaw.com; azealia@silversteinlaw.com; ashling@silversteinlaw.com; emma@silversteinlaw.com; lindsay@silversteinlaw.com; gordon@silversteinlaw.com; gordon@silversteinlaw.com; f2@silversteinlaw.com; h2@silversteinlaw.com; hampson@silversteinlaw.com; melissa@silversteinlaw.com; franklin@silversteinlaw.com; vbroom@silversteinlaw.com; shorton@silversteinlaw.com  
Cc: Esther Kornfeld; Nara Sothigavan; Robert Silverstein  
Subject: Further Objections to General Plan Amendments and Notices of Exemption for, and of General Plan Amendment GPA-2020-01 and GPA-2020-02; CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037  
Date: Tuesday, June 30, 2020 12:15:15 PM

Please click on the following link for our comments on the above-referenced matter. Please confirm receipt.

<https://www.dropbox.com/s/rc6uy2ia2genfb6/6-30-20%20%5BSCAN%5D%20Further%20Objections%20to%20General%20Plan%20Amendments%20%28GPA%29%20%26%20Notices%20of%20Exemptions%20%28NOE%29.PDF?dl=0>

Thank you.

Veronica Lebron  
The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Telephone: (626) 449-4200  
Facsimile: (626) 449-4205  
Email: Veronica@RobertSilversteinLaw.com  
Website: www.RobertSilversteinLaw.com

=====  
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=====

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WWW.ROBERTSILVERSTEINLAW.COM

June 30, 2020

**VIA EMAIL**

**yhorton@cityofinglewood.org;**

**aphillips@cityofinglewood.org**

Yvonne Horton, City Clerk  
City Clerk's Office on behalf of  
Inglewood Planning Commission  
Mayor and City Council  
Inglewood Successor Agency, Inglewood  
Housing Authority, Inglewood Parking  
Authority, Joint Powers Authority  
1 Manchester Boulevard  
Inglewood, CA 90301

**VIA EMAIL**

**fljackson@cityofinglewood.org;**

**mwilcox@cityofinglewood.org;**

**Ibecproject@cityofinglewood.org**

Fred Jackson, Senior Planner  
Mindy Wilcox, AICP, Planning Manager  
City of Inglewood, Planning Division  
1 West Manchester Boulevard, 4th Floor  
Inglewood, CA 90301

Re: Further Objections to General Plan Amendments and Notices of Exemption  
for, and of General Plan Amendment GPA-2020-01 and GPA-2020-02;  
CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037

Dear Mayor Butts, Council Members, Mr. Jackson and Ms. Wilcox:

Please include this letter in the administrative record for **both** the above-referenced matters **and** the Inglewood Basketball and Entertainment Center (IBEC) project, SCH No. 2018021056. This letter applies to **both** June 30, 2020 City Council hearing Agenda Items PH-2 and PH-3, as well as agenda items DR-1 and DR-2.<sup>1</sup>

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<sup>1</sup> We appreciate the staff recommendation to rescind the General Plan amendments and their CEQA exemptions adopted on June 9, 2020 in response to public comments about Brown Act violations that deprived the public of its participation rights (DR-1 and DR-2). However, the rescission staff report does not explain the reason for rescission. Also, staff's recommendation for a same-day re-approval of the General Plan amendments (PH-2 and PH-3), immediately after rescission – with the violations detailed in this letter, particularly the claimed incorporation of the June 9, 2020 staff report which contains *sub rosa* revisions therein – makes the City's actions all the more problematic, and further depriving the public of its information and participation rights.

**I. INTRODUCTION.**

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Prairie Ave., Inglewood. Please keep this office on the list of interested persons to receive timely notice of all hearings and determinations related to the City's proposed adoption of the General Plan Amendments for the Land Use Element and adoption of the Environmental Justice (EJ) Element ("Project(s)") and their Categorical Exemptions.

Please also provide us timely notice of any filing of Notice of Exemption or Notice of Determination under Pub. Res. Code § 21167(f) for both the amendment of the Land Use Element and the adoption of the Environmental Justice Element.

This is a further follow up to our April 13, 2020, May 26, 2020, and June 9, 2020 objection letters about both Projects: Land Use Element and Environmental Justice Element. (Exh. 1 [June 9, 2020 Objection Letter, which includes prior objection letters of April 13 and May 26, 2020].)

**II. THE CITY'S PROPOSED AMENDMENTS/ADOPTION OF LAND USE AND ENVIRONMENTAL JUSTICE ELEMENTS VIOLATE CEQA'S MANDATE FOR GOOD FAITH DISCLOSURE OF PROJECT DESCRIPTION AND IMPACTS.**

CEQA pursues four major goals, one of which is informational. Guidelines § 15002. "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a **decent home** and satisfying **living** environment for every Californian." Guidelines § 15021(d). CEQA mandates the City's "good faith effort at full disclosure." Guidelines § 15204. An agency is not acting in good faith when "it gives conflicting signals to decision makers and the public about the nature and scope of the activity being proposed." San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 655–656.

The City has repeatedly violated this good faith disclosure requirement under CEQA, as detailed in our prior objection letters. The City has yet again violated CEQA's good faith disclosure mandate through several **misrepresentations** in the June 30, 2020 City Council meeting staff reports for PH-2 and PH-3, as listed below.

**A. Staff Reports for Both PH-2 and PH-3 Agenda Items Omit Any Reference to Our June 9, 2020 Further Objection Letter and Fail to Respond to It.**

On June 9, 2020 – hours before the City Council meeting of that date commenced – we sent a detailed “Further Objection Letter” related to both Land Use and Environmental Justice (EJ) Elements and their Exemptions. Yet at p. 2 of the respective June 30, 2020 supplemental staff reports for PH-2 (EJ element) and PH-3 (Land Use element), staff fails to acknowledge receipt of our June 9, 2020 Objection Letter.

Derivatively, the June 30, 2020 staff reports for both PH-2 and PH-3 fail to address the concerns we raised in our June 9, 2020 objection letter, applicable to both Land Use and EJ Element approvals and their exemptions.

Thus, both the public and the decisionmakers were deprived of good faith disclosure of our letter, including critical CEQA concerns expressed therein, as well as of the City’s responsive position, if any.

It is well-settled:

“[T]he ultimate decision of whether to approve a project, be that decision right or wrong, is a nullity if based upon an EIR that does not provide the decision-makers, and the public, with the information about the project that is required by CEQA.” (Santiago County Water Dist. v. County of Orange (1981) 118 Cal.App.3d 818, 829, 173 Cal.Rptr. 602 (Santiago); Vineyard Area Citizens, supra, 40 Cal.4th at p. 443, 53 Cal.Rptr.3d 821, 150 P.3d 709 [“That a party’s briefs to the court may explain or supplement matters that are obscure or incomplete in the EIR ... is irrelevant, because the public and decision makers did not have the briefs available at the time the project was reviewed and approved.”].)” Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70, 85-90.

The City is also violating CEQA, by depriving the public and decisionmakers of the mandatory good faith effort at full disclosure, by failing to respond to the concerns we raised in our June 9, 2020 letter.

**B. Staff Reports for Both PH-2 and PH-3 Agenda Items Claim to Incorporate by Reference the *Prior June 9, 2020 Staff Reports for PH-1 and PH-2, Respectively, but Actually Attach Altered June 9, 2020 Staff Reports, Without Any Indicia or Notice to the Public of Such Revisions.***

Both June 30, 2020 Staff Reports for PH-2 (EJ Element) and PH-3 (Land Use Element) provide a page and a half supplemental staff-report, followed by attachments of what they *claim* to be the prior June 9, 2020 staff report for the respective items:

“Attached to this Supplemental Staff report, and incorporated herein by reference, is the **full staff report** for the **originally** scheduled June 9, 2020 Public Hearing on the adoption of General Plan Amendment 2020-001 (GPA-2020-001) for an Environmental Justice Element of the General Plan. In order to ensure that members of the public have had full opportunity to participate in the public process, the City Council is holding a new public hearing on the Environmental Justice element following which the City Council may take action on the items listed above.” (Exh. 2 [PH-2 Staff Report for June 30, 2020]; emph. added.)

“Attached to this Supplemental Staff report, and incorporated herein by reference, is the **full staff report** for the **originally** scheduled June 9, 2020 Public Hearing on the adoption of General Plan Amendment 2020-002 (GPA-2020-002) to amend the Land Use Element of the Inglewood General [sic] Plan to clarify existing population density and building intensity allowances for all land use designations. In order to ensure that members of the public have had full opportunity to participate in the public process, the City Council is holding a new public hearing on the General Plan Land Use Element amendment following which the City Council may take action on the items listed above.” (Exh. 3 [PH-3 Staff Report for June 30, 2020]; emph. added.)

The above-quoted passage is then followed by pages of vetting signatures from various departments, including the City Attorney’s office, as well as verifications from the City Manager’s office.

Yet the purported June 9, 2020 staff report attached to the supplemental verified staff report of June 30, 2020 contains a number of revisions, without any notice or indicia of those revisions to the public. Some of the revisions in fact address arguments raised in our prior objection letters about the City's omissions. Some other additions and revisions attempt to counter our objections in the June 9, 2020 letter – but those responses would have been easily overlooked by us (and the public) had we not noticed the surreptitious revisions to the prior June 9, 2020 staff report, hidden in a **document that the City falsely claimed was identical to the original June 9, 2020 staff report.**

It is not the duty of the public to sift through extensive staff reports and search for inconspicuous revisions and then to try to catch the legal errors or respond to rebuttals. San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 659 (“The decisionmakers and general public should not be forced to sift through obscure minutiae or appendices in order to ferret out the fundamental baseline assumptions that are being used for purposes of the environmental analysis”). Also, “a Lead Agency is responsible for the adequacy of its environmental documents. The Lead Agency shall not knowingly release a deficient document hoping that public comments will correct defects in the document.” Guidelines § 15020. The City's release of an **altered June 9, 2020 staff report, masquerading as the original June 9, 2020 staff report**, as attachments to the June 30, 2020 staff report for PH-2 and PH-3 items, constitutes a knowingly false and misleading document by the public, putting the burden on the public to catch and correct the mistakes/revisions. Although we caught this falsification of the original June 9, 2020 staff report, we can reasonably assume that many if not all other members of the public did not. **The entire matter should be cancelled and renoticed for future hearing with clear, truthful, and non-falsified documents provided by the City to the public.**

As one example, the *altered* EJ Element (PH-2) June 9, 2020 staff report at p. 1 notes that the Planning Commission has adopted the EJ Element with “minor revisions.” (Compare **Exh. 2**, p. 1 of the revised June 9, 2020 Staff Report with **Exh. 4**, p. 1 [Original June 9, 2020 Staff Report].) This revision might have been in response to our criticism that any revision after the Planning Commission's approval has to go back to the Planning Commission for re-approval before going to the City Council. (**Exh. 1**, p. 11, footnote 4.)

Similarly, the *altered* Land Use Element (PH-3) staff report of June 9, 2020, has *added* a full new paragraph trying to rebut our prior objections. (Compare **Exh. 3**, p. 3 of the revised June 9, 2020 staff report with **Exh. 5**, p. 3 [Original June 9, 2020 staff report].) Also, in response to our June 9, 2020 letter related to the City's failure to include our May 26, 2020 letter, the *altered* June 9, 2020 staff report has added reference

to it at p. 5. (P. 5 of both **Exhs. 3 and 5**, of the June 9, 2020 staff report.)

Further, and most importantly, the revised June 9, 2020 staff report adds two paragraphs addressing our June 9, 2020 objection letter and yet fails to acknowledge the commenter or the comment. (Compare **Exh. 3**, pp. 8-9 of the June 9, 2020 staff report and **Exh. 5**, p. 7 of the June 9, 2020 staff report.) The added two paragraphs attempt to rebut our arguments related to the CEQA exemptions in our June 9, 2020 letter, and – had it not been for our perusal of the documents and comparison of it with the prior version – we and the public/decisionmakers would have never been informed of the City’s responses to the concerns we raised. The City’s attempt to conceal responses to our concerns by pretending that the original June 9, 2020 staff report was simply being reproduced, was intended to prejudice us and foreclose any further comments to the City’s responses.

The above examples are illustrative, not exhaustive.

Finally, the June 30, 2020 incorporated staff report for PH-2 (EJ Element) preserved the Notice of Exemption for the EJ element that it had attached to its June 9, 2020 letter. While we had not discovered or raised this objection the last time, we now note and object that – similar to the Land Use Element’s changed Notice of Exemption which was altered and which we discovered before (see **Exh. 1**, p. 8) – the City’s Notice of Exemption for the EJ Element, attached to both the June 9, 2020 and now June 30, 2020 staff reports, is also altered, as compared with the Notice of Exemption the City published initially since April, 2020 and presented to the Planning Commission on April 13, 2020. (Compare the Notices in the incorporated **Exh. 2** revised June 9, 2020 staff report with **Exh. 6** [City’s originally published Notice of Exemption that was voted upon by the Planning Commission on April 13, 2020, with the preceding page from the Planning Commission’s staff report].)

Thus, the City’s attachment of the prior June 9, 2020 staff reports to the June 30, 2020 Staff Reports for PH-2 and PH-3 – with revisions and additions and lack of notice thereof – prejudiced the unwitting public and commenters, as well as the decisionmakers, due to not only a lack of good faith disclosure, but worse, an illicit attempt to conceal information from disclosure and public awareness of same. Secretly embedding new information under an old (June 9, 2020 staff report) title is not the way for government to operate.

**III. THE CITY’S ATTACHMENT OF THE JUNE 9, 2020 STAFF REPORT WITH REVISIONS BUT NO NOTICE THEREOF TO THE PUBLIC MAY ALSO CONSTITUTE A CRIMINAL VIOLATION PER GOVT. CODE §§ 6200-6203.**

Govt. Code § 6200 makes it a crime to alter or falsify public documents:

“Every officer having the custody of any record, map, or book, or of any paper or proceeding of any court, filed or deposited in any public office, or placed in his or her hands for any purpose, is punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code for two, three, or four years if, as to the whole or any part of the record, map, book, paper, or proceeding, the officer willfully does or permits any other person to do any of the following:

- (a) Steal, remove, or secrete.
- (b) Destroy, mutilate, or deface.
- (c) Alter or falsify.” Id.

Govt. Code §§ 6201-6203 make the violation of altering or falsifying a record actionable not only as to the custodian of records as in Section 6200, but also as to non-custodians and to those who certify and verify the record as correct.

The June 30, 2020 staff reports for both PH-2 and PH-3 agenda items, incorporating the *altered* versions of both June 9, 2020 staff reports of the same items, as well as *altered* Notices of Exemption of both Land Use and EJ Elements – all **without any notice to the public that the documents were altered** and yet claiming those records are the same ones previously published – effectively falsifies public records, in violation of Govt. Code §§ 6200-6203.

We request that the City – and all respective officials and personnel responsible for keeping the records or verifying them as being authentic and correct – formally and publicly acknowledge the revisions made to the June 9, 2020 staff reports (as attached to the June 30, 2020 staff report) and the Notices of Exemption, as part of the City’s cancellation of this hearing, rescheduling it in accordance with law, and publishing non-altered, non-falsified documents, or making changes, but with clear notice to the public.



This is necessary so that the public has a chance to review the changes and revisions, prior to bringing them before the City Council for approval.

Finally, we request that the City cease and desist falsification of public records.

**IV. THE CITY'S LATE-ADDED AND YET CONCEALED RESPONSE TO OUR OBJECTIONS RELATED TO THE COMMON SENSE EXEMPTION AND MINOR LAND USE ALTERATIONS ARE INCONSISTENT, MUTUALLY EXCLUSIVE AND LACK SUBSTANTIAL EVIDENCE.**

The City's *altered* June 9, 2020 staff report incorporated into the June 30, 2020 staff report for PH-3 has added a purported rebuttal to our June 9, 2020 letter about the City's misuse of the common sense and minor alterations exemptions. Beyond being in violation of the required good faith effort at disclosure (for being placed in the June 9, 2020 staff report falsely claimed by the City to be the same as the original June 9, 2020 staff report), the City's responses lack merit.

It is incorrect for the City to assert or assume that there is an implied presumption of no significant impacts with the common sense exemption. (**Exh. 1**, p. 7.) Moreover, the land use changes provide for 1380% building intensity within the industrial zoning, where the City intends to include the IBEC Project into such industrial zoning qualification. Roughly, the 1380% FAR will allow anyone to build about fourteen times (13.8) bigger projects on the same lot (approximately 138 ft high). Since the City's 1380% building intensity does not specify what part of the structure will indeed be included in the calculation of the FAR, it is impossible to determine the implication of such percentage in the proposed land use element designation (e.g., some areas such as parking are typically not counted as part of the FAR). The Clipper's IBEC Project is proposed to be about 150 feet tall. (**Exh. 7** [excerpts from the IBEC DEIR, presently before the City].) Thus, the 1380% building intensity allowing to build almost 150 feet tall specifically enable the Clippers' IBEC Project's arena. The IBEC DEIR identified 41 significant environmental impacts which cannot be mitigated. Thus, the 41 significant impacts of the IBEC Project will be made possible by the present Land Use element's designation of building intensity for the industrial zoning, and are therefore impacts that disqualify the Land Use element amendment from the common sense exemption.

Moreover, while typically industrial zoning does not involve a lot of *commercial* activity and has *limited* hours of operation throughout the day and week, the IBEC project – based on its recent representations in the administrative record – contemplates round-the-clock activity on all days of the week. (**Exh. 8** [Feasibility Study and

Infeasibility of Same-Day Event limitation].) In particular, documents in the record show that the IBEC Project will involve far more activity than SoFi Stadium or MSG Forum, and will involve extensive commercial activity beyond the hours devoted to the games or special events. The extensive commercial activity by IBEC (or any future similar project), proposed in the industrial zoning designated with 1380% building intensity is yet further substantial evidence to rebut the City's claim of "no possibility" or "certainty" that the proposed land use designations will not have any significant impact.

Exemptions from CEQA's requirements are to be construed narrowly in order to further CEQA's goals of environmental protection. Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster (1997) 52 Cal.App.4th 1165, 1220. Projects may be exempted from CEQA only when it is indisputably clear that the cited exemption applies. Save Our Carmel River v. Monterey Peninsula Water Management Dist. (2006) 141 Cal.App.4th 677, 697.

Further, the above-noted changes enabling the massive IBEC Project constitute substantial evidence that the proposed changes under the Land Use element amendments are far more than "minor" alterations.

Moreover, the City's Class 5 "minor alterations" exemption and its reasoning are inconsistent with its justification for the "common sense exemption," according to which the Land Use "proposed amendments do not change development densities or intensities or authorize or change any preexisting land use designations" but "restate existing standards for land use designations in terms of population density and building intensity." The City may not argue out of both sides of its mouth.

Finally, as we have previously noted, substantial evidence is not argument or speculation. Pub. Res. Code § 21080(e)(1); Guidelines § 15384(a). The City has no substantial evidence to support its finding of any exemption, and particularly those of minor alterations or common sense exemption.

**V. THE CITY'S RELAXING OF THE PRINCIPLES OF ENVIRONMENTAL JUSTICE IN THE NEW ENVIRONMENTAL JUSTICE ELEMENT WILL HAVE ADDITIONAL SIGNIFICANT AND DISPARATE IMPACTS ON INGLEWOOD IN VIEW OF ITS DEMOGRAPHICS.**

Our prior June 9, 2020 objection letter, together with its referenced objection letters and public comments, demonstrates how the proposed EJ element fails to address numerous concerns of the public related to the safety of public transit or Inglewood

streets to enable alternate modes of transportation or walking. The safety concerns are compounded by the fact that any alternate mode of transportation – public transit, bicycling, walking – makes people more exposed to air pollution outside, whereas riding public transit is also counter to social distancing and makes people exposed and vulnerable to both known and unknown infections and diseases, such as COVID-19.

The concerns of air pollution are particularly grave in view of Inglewood's location close to LAX Airport, as well as the anticipated opening of the SoFi Stadium and the proposed IBEC Project, both of which will dramatically increase traffic in the City. The fact of increased traffic is beyond dispute, including in light of the City's adoption of the Parking Ordinance on June 16, 2020, to purportedly manage parking during the anticipated events.

While the above concerns apply to all people, the City's EJ element's relaxed standards threaten to visit worse significant impacts on Inglewood's population. Recent research of 32 million U.S. births showed that air pollution and climate change has a particularly disparate significant impact on low-income population and minorities. (**Exh. 9** [Article re Disproportionate Impact of Climate Change on Minorities and Black People].) Based on the EJ Element, about half of Inglewood's population is Black, while about the other half is Hispanic.

Therefore, Inglewood demographics mandates more stringent and careful Environmental Justice principles and safeguards than the illusory and non-enforceable policies in the draft EJ Element.

## **VI. CONCLUSION.**

We request that the City Council reject the proposed Land Use Element amendments and Environmental Justice Element as being illegally piecemealed from the IBEC project, and also require staff to provide an accurate Land Use Element description, as well as rewrite the EJ Element to provide genuine safeguards for Inglewood's population against air pollution and for responsive public involvement and participation in all land use decisions. In addition, the use of Notices of Exemption under CEQA is a failure to proceed in the manner required by law.

We also request that the City Council require staff to address the grave concerns raised in this letter about the City's surreptitious alterations of the staff reports and exemption notices, before adopting any amendment to the General Plan, or any CEQA documents in connection therewith, and particularly inapplicable Notices of Exemption.

Very truly yours,

*/s/ Robert Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl  
Encls.

cc: James T. Butts, Jr, Mayor (via email [jbutts@cityofinglewood.org](mailto:jbutts@cityofinglewood.org))  
George W. Dolson, District 1 (via email [gdolson@cityofinglewood.org](mailto:gdolson@cityofinglewood.org))  
Alex Padilla, District 2, (via email [apadilla@cityofinglewood.org](mailto:apadilla@cityofinglewood.org))  
Eloy Morales, Jr., District 3 (via email [emorales@cityofinglewood.org](mailto:emorales@cityofinglewood.org))  
Ralph L. Franklin, District 4 (via email [rfranklin@cityofinglewood.org](mailto:rfranklin@cityofinglewood.org))  
Wanda M. Brown, Treasurer (via email [wbrown@cityofinglewood.org](mailto:wbrown@cityofinglewood.org))  
Artie Fields, Executive Director (via email [afields@cityofinglewood.org](mailto:afields@cityofinglewood.org))  
Kenneth R. Campos, City Attorney (via email [kcampos@cityofinglewood.org](mailto:kcampos@cityofinglewood.org))

**Note to Reader:**  
**All Exhibits attached to this letter are a part of  
the Administrative Record and can be found at  
[ibecproject.com](http://ibecproject.com)**

**The Silverstein Law Firm, APC**

**June 30, 2020**

**Further Objections to General Plan Amendments and  
Notices of Exemption for, and of General Plan Amendment  
GPA-2020-01 and GPA-2020-02;  
CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037**

**EXHIBIT 1**

City Council Staff Report

Attachment 7:

Planning Commission Minutes of June 17, 2020

**3. Communications from staff.**

ECDD Director Christopher E. Jackson, Sr. read the public participation procedures contained in the agenda, into the record.

Planning Manager Mindy Wilcox stated Public comments have been received from the following individuals Dev Bhalla, Robert Silverstein, David Pettit, Kevin Brogan, Jamie Fisher, and Ken Campos the Inglewood City Attorney.

In addition, staff has prepared an Errata Memorandum summarizing revisions to the following documents:

- Staff report
- EIR Resolution
- Zone Change and Zoning Code Amendment Resolution
- Development Guidelines
- Development Agreement Resolution

Staff has determined that the revisions outlined in the errata are minor.

Public comments have been received from the following individuals Dev Bhalla, Robert Silverstein, David Pettit, Kevin Brogan, Jamie Fisher, and Ken Campos the Inglewood City Attorney.

The errata and public comments have all been distributed to the Planning Commission, a copy placed in the lobby of City Hall, and posted online, on the Planning Commission agenda page.

**5. PUBLIC HEARING:**

A public hearing to consider the following actions related to the Inglewood Basketball and Entertainment Center (IBEC) that includes an arena calculated to promote the enjoyment and recreation of the public by providing access to the City's residents in the form of spectator sports, specifically basketball, with up to 18,000 fixed seats to host National Basketball Association (NBA) games, and with up to 500 additional temporary seats for other events such as family shows, concerts, corporate and community events, and other sporting events; an up to 85,000-square foot team practice and athletic training facility; up to 71,000 square feet of LA Clippers office space; an up to 25,000-square foot sports medicine clinic; up to 63,000 square feet of ancillary and related arena uses including retail and dining; an outdoor plaza adjacent to the arena; parking facilities; relocation of a City of Inglewood groundwater well; and various circulation, infrastructure, and

other ancillary uses (the IBEC Project). The IBEC project will also include a limited-service hotel:

**5A. Certification of the Project Environmental Impact Report No. EA-EIR-2020-045 (EA-EIR-2020-045), State Clearinghouse No.: SCH2018021056,** and adoption of a Mitigation Monitoring Reporting Program, and California Environmental Quality Act (CEQA) Findings and Statement of Overriding Considerations.

**5B. General Plan Amendment No. 2020-003 (GPA-2020-003)** to modify the Land Use Element, Circulation Element, and Safety Element of the Inglewood General Plan with conforming map and text changes to reflect the plan for the IBEC Project , including:

- Re-designation 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 IBEC Project; and
- Updating Safety Element map to reflect the relocation of the municipal water well and related infrastructure.

**5C. Specific Plan Amendment No. 2020-001 (SPA-2020-001)** to amend the Inglewood International Business Park Specific Plan to exclude properties within the IBEC Project Site from the Specific Plan Area.

**5D. Zoning Code Amendment No. 2020-002** to Chapter 12 of the Inglewood Municipal Code to establish regulations for the Sports and Entertainment Overlay Zone for the IBEC Project , 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 process under the Proposed Project SEC Development Guidelines, addressing parcel map procedures, and other land use controls; and,



**5D. Zone Change No. 2020-001 (ZC-2020-001)** to apply the Sports and Entertainment (SE) Overlay Zone on the entire IBEC Project Site, and Rezone certain parcels in the Project Site to conform with the existing General Plan Land Use Designation.

**5E. Sports and Entertainment Complex Design Guidelines and Infrastructure Plan (SEC Development Guidelines)**, for the IBEC Project , including:

- Implementation and Administration;
- Design Guidelines; and
- Infrastructure Plan.

The SEC Development 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.

**5F. Development Agreement between Murphy's Bowl LLC and the City** for the development of a Sports and Entertainment Complex, addressing community benefits and vesting entitlements for the Project.

Mindy Wilcox, Planning Manager made the staff presentation.

After concluding her presentation, Ms. Wilcox stated that Whit Manley, Special Environmental Counsel to the City, will provide some additional comments related to the Environmental Impact Report (EIR) and related topics.

Whit Manley summarized the comprehensive nature of the environmental documents.

Ms. Wilcox stated that concludes staff's presentation.

Chairman Springs asked the Planning Commission if there were any questions for staff.

Commissioner Patrick asked if permitted parking was going to be included in the EIR.

Ms. Wilcox stated that the conditions described in the EIR are what the analysis was based on. She stated that parking is not one of the environmental study areas contained in the EIR. Ms. Patrick stated that Access is a riding service for individuals that need assistance getting in and out of the vehicle. Will there be a separate lane for the Access services. Ms. Wilcox stated that the applicant could best answer that.

Commissioner Trejo asked if any mitigation can take place to lessen the traffic impact for emergency vehicles. Ms. Wilcox called on Brian Boxer from Environmental Science Associates, the City's CEQA consultant, to answer this question.

Brian Boxer stated that the City and applicant will be working with the nearby hospital on an emergency access plan to ensure that citizens and first responders' vehicles can get through. It will include the use of traffic control officers and identification of alternate routes. He stated that the plan will also be adaptable over time and the operator of the arena and the city will continue to work on an ongoing basis with the hospital to ensure that there will be access to the hospital for both citizens and first responders before, after, and during an event. Ms. Trejo asked if in an emergency, additional consideration has been given for fire trucks to be able to access the city streets. Mr. Boxer stated that the EIR includes a traffic management plan for events. He stated that plan requires traffic control officers to be in contact with the emergency providers and they have the authority to clear the streets for the emergency vehicles.

Commissioner Rice asked if Doty and 102<sup>nd</sup> Street east of the proposed arena will be altered such as parking restrictions. Ms. Wilcox stated that access from 102<sup>nd</sup> to the site is proposed for utility purposes, and trash vehicles, there are no parking restrictions proposed in that area.

Commissioner Trejo commended staff and all of the consultants for putting a very comprehensive planning report together.

Gerard McCallum made a presentation for the applicant. Mr. McCallum described the proposed project including architectural design, project community benefits, and operational plans. 1:18

Chairman Springs asked the Planning Commission if there were any questions for Staff.

Commissioner Rice asked how citizens will access the EV charging stations. Mr. McCallum stated that they are working on developing a rebate program.

Commissioner Springs asked if the affordable housing will be located in Inglewood. Mr. McCallum stated yes and the program would act as an incentive plan for developers to develop affordable housing in the city. Mr. Springs asked how will the project save 40 percent of its water. Mr. McCallum stated that various facilities within the bowl such as low flow fixtures and water efficient landscaping design. Chairman Springs asked about the program that gives \$450 million for Inglewood residents. Mr. McCallum stated that it would come in terms of property and sales tax. Chairman Springs asked to confirm if the 1,000 trees will be planted throughout the entire city. Mr. McCallum confirmed yes.

Chairman Springs requested that Mr. Whit Manley give his presentation again to make sure everyone could hear him clearly.

Mr. Manley stated that the EIR was prepared by Environmental Science Associates. The transportation analysis was prepared by Fehr and Peers. The Draft and Final EIR and transportation analysis were very thorough and easy to navigate. He stated that the city took an unusually active approach to soliciting and responding to comments. The City received comments from a number of agencies and individuals. In many instances the city responded to the comments and proposals by incorporating their recommendations into the project. He stated that after the city published the Final EIR, the city received critical comments from residents who own property in the area or the lawyers who represented them. The comments were submitted at the end of the CEQA process rather than

early on. Mr. Manley stated that the analysis is not cursory and the process has been transparent in every step of the way. The city's entire record including the EIR are posted to a dedicated website. Mr. Manley stated the city extended the comment period on the Draft EIR on three occasions and the review period was roughly twice the required length. He stated that the claim that the city is getting a free pass is not correct. He stated the project is subject to an extensive list of mitigation measures all of which will be monitored and enforced by the city.

Mr. Manley stated that they reviewed the comments and have concluded that the last minute comments raise issues that have already been addressed in the EIR, by city staff and consultants. Chairman Springs opened up the floor for questions from the Commissioners.

There were no questions.

Chairman Springs stated that there will be a five minute recess.

Chairman Springs opened up the floor for public comments to speak for or against this project.

**FOR / AGAINST:**

This was affirmed by the AT&T On-line Operator.

1. Joseph Teixeira - Inglewood Resident - Against  
He stated that the air quality will be negatively affected.
2. Catherine Pope - Inglewood Resident - For
3. Dev Bhalla - Inglewood Resident - Against  
He stated that residents will not be able to enjoy the arena because they won't be able to afford the price of a ticket.
4. Eric Baines - Inglewood Business Owner - For
5. Tracy Johnson - Inglewood Business Owner - For
6. Ricardo Rosales - Inglewood Business Owner - For
7. Odest Riley, Jr. - Inglewood Resident & Business Owner - For
8. Robert Gakskill - Inglewood Business Owner - For
9. Beny Ashburn - Inglewood Business Owner - For
10. Teo Hunter - Inglewood Business Owner - For
11. Hamilah Ginyard - Inglewood Resident - For
12. Diane Sambrano - Inglewood Resident - Against  
She stated that there will not be many full time jobs available. She also stated that the information was not on the website in a timely manner and the meeting was not held on the usual first Wednesday of the month.
13. Robert Silverstein - Attorney representing Kenneth & Dawn Baines Inglewood Business Owners - Against

Mr. Silverstein stated that the city disregarded their suggestions and issues that they raised. He expressed concerns about greenhouse gas emissions.

14. Luis Keene – Asked questions regarding the community benefits agreement.

AT&T Operator confirmed there were no more comments.

5 minute break requested by Staff.

Chairman Springs stated that there will be a five minute recess.

Chairman Springs opened up the floor for questions from the Commissioners.

None.

ECD Director Christopher E. Jackson, Sr. asked to confirm if City staff or City consultants have any additional information or comments to provide. Comments were provided from Royce Jones of Kane Ballmer and Berkman, Special Outside Counsel to the City of Inglewood

None.

Mr. Manley requested that a roll call vote be taken to close the public hearing.

Mr. Jackson stated that this is not something that we routinely do so it is up to the Commission's discretion, however under these circumstance it is advisable by our counsel, Mr. Whit Manley, that the Commission do so.

Commissioner Trejo made a motion to close the public hearing. Commissioner Patrick seconded the motion.

The motion passed by the following roll call vote:

Ayes: Commissioners Patrick, Trejo, Rice, and Chairman Springs  
2:40

**MOTION, 5a:**

Commissioner Trejo made a motion to adopt a Resolution recommending City Council Certification of the Project Environmental Impact

Report No. EA-EIR-2020-045 (EA-EIR-2020-045), State Clearinghouse No.: SCH2018021056, and adoption of a Mitigation Monitoring Reporting Program, and California Environmental Quality Act (CEQA) Findings and Statement of Overriding Considerations and subject to the errata where it applies.  
Commissioner Rice seconded the motion.

The motion passed by the following roll call vote:

Ayes: Commissioners Patrick, Trejo, Rice, and Chairman Springs

**MOTION, 5b:**

Commissioner Patrick made a motion to adopt a Resolution recommending City Council adoption of General Plan Amendment No. 2020-003 (GPA-2020-003) to modify the Land Use Element, Circulation Element, and Safety Element of the Inglewood General Plan with 3 conforming map and text changes to reflect the plan for the IBEC Project and subject to the errata where it applies.  
Commissioner Trejo seconded the motion.

The motion passed by the following roll call vote:

Ayes: Commissioners Patrick, Trejo, Rice, and Chairman Springs

**MOTION, 5c:**

Commissioner Rice made a motion to adopt a Resolution recommending City Council adoption of Specific Plan Amendment No. 2020-001 (SPA-2020-001) to amend the Inglewood International Business Park Specific Plan to exclude properties within the IBEC Project Site from the Specific Plan Area and subject to the errata where it applies.

Commissioner Patrick seconded the motion.

The motion passed by the following roll call vote:

Ayes: Commissioners Patrick, Trejo, Rice, and Chairman Springs

**MOTION, 5d:**

Commissioner Trejo made a motion to adopt a Resolution recommending City Council adoption of Zone Change No. 2020-001 (ZC-2020-001) to apply the Sports and Entertainment (SE) Overlay Zone on the entire IBEC Project Site, and Rezone certain parcels in the Project Site to conform with the existing General Plan Land Use Designation and Zoning Code Amendment No. 2020-002 to Chapter 12 of the Inglewood Municipal Code to establish regulations for the Sports and Entertainment Overlay Zone, 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 process under the Proposed Project SEC Development Guidelines, addressing parcel map procedures, and other land use controls and subject to the errata where it applies.

Commissioner Rice seconded the motion.

The motion passed by the following roll call vote:

Ayes: Commissioners Patrick, Trejo, Rice, and Chairman Springs

**MOTION, 5e:**

Commissioner Patrick made a motion to adopt a Resolution recommending City Council adoption of the Sports and Entertainment Complex Design Guidelines and Infrastructure Plan (SEC Development Guidelines), for the IBEC Project, including Implementation and Administration; Design Guidelines; and Infrastructure Plan and subject to the errata where it applies.

Commissioner Rice seconded the motion.

The motion passed by the following roll call vote:

Ayes: Commissioners Patrick, Trejo, Rice, and Chairman Springs

**MOTION, 5f:**

Commissioner Trejo made a motion to adopt a Resolution Recommending City Council adoption of a Development Agreement between Murphy's Bowl LLC and the City for the development of a Sports and Entertainment Complex, addressing community benefits and vesting

entitlements for the Project and subject to the errata where it applies.

Commissioner Rice seconded the motion.

The motion passed by the following roll call vote:

Ayes: Commissioners Patrick, Trejo, Rice, and Chairman Springs

Ms. Wilcox stated that there is no appeal process for these decisions and they will move on automatically for consideration by the City Council.

...

Meeting was adjourned at 10:02 P.M. .



City Council Staff Report

Attachment 8:

Draft Environmental Impact Report Resolution

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**RESOLUTION NO. \_\_\_\_\_**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF INGLEWOOD, CALIFORNIA, CERTIFYING AN ENVIRONMENTAL IMPACT REPORT (EA-EIR-2020-045), ADOPTING ENVIRONMENTAL FINDINGS, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS, AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM IN ACCORDANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT FOR THE INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER.**

**(EA-EIR-2020-45)**

**SECTION 1.**

WHEREAS, Murphy’s Bowl, LLC (Project Sponsor) seeks the development of the Inglewood Basketball and Entertainment Center (IBEC) that includes an arena intended to promote the enjoyment and recreation of the public by providing access to the City’s residents in the form of spectator sports, specifically basketball, with up to 18,000 fixed seats to host National Basketball Association games, and with up to 500 additional temporary seats for other events such as family shows, concerts, corporate and community events, and other sporting events; an up to 85,000-square foot team practice and athletic training facility; up to 71,000 square feet of LA Clippers office space; an up to 25,000-square foot sports medicine clinic; up to 63,000 square feet of ancillary and related arena uses including retail and dining; an outdoor plaza adjacent to the arena; parking facilities; relocation of a City of Inglewood groundwater well; and various circulation, infrastructure, and other ancillary uses (the Project). The Project will also include a limited-service hotel. The area of the IBEC Project is shown in Exhibit A; and

WHEREAS, the California Environmental Quality Act, Public Resources Code section 21000, et seq. (CEQA) requires preparation of an Environmental

1 Impact Report (EIR) analyzing the potential environmental impacts of the Project  
2 prior to approval of the Project; and

3 WHEREAS, on February 20, 2018, the City circulated a Notice of  
4 Preparation (NOP) that described the Project and potential environmental  
5 impacts. The NOP was published and was distributed to local, regional, and State  
6 agencies. The NOP stated that the City would prepare an EIR to evaluate the  
7 potentially significant impacts of the Project; and

8 WHEREAS, on March 12, 2018, the City held a Public Scoping Meeting and  
9 public comment was taken on the Project and potential environmental impacts of  
10 the Project; and

11 WHEREAS, the City prepared a Draft EIR to assess the environmental  
12 impacts of the Project, taking into account the comments received by the City on  
13 the NOP and at the Public Scoping Meeting; and

14 WHEREAS, the City filed and distributed a Notice of Completion and  
15 Availability for the Draft EIR (State Clearinghouse No. 2018021056) on December  
16 27, 2019; and

17 WHEREAS, the Draft EIR was circulated for public review and to the  
18 appropriate agencies and interested parties from December 27, 2019 to March 24,  
19 2020; and

20 WHEREAS, pursuant to CEQA, the City prepared a Final EIR (June 2020),  
21 which included responses to comments received on the Draft EIR and edits to the  
22 Draft EIR. The Final EIR consists of the Introduction, Response to Comments,  
23 Revisions to the Draft EIR, and the Mitigation Monitoring and Reporting Program  
24 (MMRP); and

25 WHEREAS, the Final EIR was set for a duly-noticed public hearing before  
26 the Planning Commission in the City Council Chambers, Ninth Floor, of the  
27 Inglewood City Hall, on the 17th day of June, 2020 at 7:00 p.m.; and

28

1           WHEREAS, the Final EIR was transmitted to the Planning Commission  
2 prior to the hearing; and

3           WHEREAS, on June 17, 2020, the Planning Commission considered the  
4 Final EIR and testimony and information received at the public hearing relating  
5 to the Project, including without limitation the oral and written reports from City  
6 staff, oral reports from City consultants, as well as the Final EIR. Following the  
7 hearing, the Planning Commission adopted Resolution No. 1868 entitled:

8  
9           **A RESOLUTION OF THE PLANNING COMMISSION OF THE**  
10           **CITY OF INGLEWOOD, CALIFORNIA, RECOMMENDING**  
11           **THAT THE CITY COUNCIL CERTIFY AN ENVIRONMENTAL**  
12           **IMPACT REPORT (EA-EIR-2020-045), ADOPT**  
13           **ENVIRONMENTAL FINDINGS, ADOPT A STATEMENT OF**  
14           **OVERRIDING CONSIDERATIONS AND ADOPT A**  
15           **MITIGATION MONITORING AND REPORTING PROGRAM IN**  
16           **ACCORDANCE WITH THE CALIFORNIA ENVIRONMENTAL**  
17           **QUALITY ACT FOR THE INGLEWOOD BASKETBALL AND**  
18           **ENTERTAINMENT CENTER**

19           WHEREAS, after publication of the Final EIR, the City continued to  
20 consider and refine the mitigation measures contained in the Final EIR and the  
21 MMRP, and those refinements are reflected in the Errata to the Final EIR, which  
22 is incorporated into the Final EIR; and

23           WHEREAS, none of the refinements to the mitigation measures as set forth  
24 in the Errata to the Final EIR relaxes or substantially alters the mitigation  
25 measures set forth in the Final EIR; and

26           WHEREAS, the Final EIR (including the Errata to the Final EIR) does not  
27 include significant new information requiring recirculation of the Draft EIR; and,

28           WHEREAS, the Draft EIR and Final EIR (including the Errata to the Final  
EIR) are incorporated herein by reference and together constitute the EIR for the  
Project; and

1           WHEREAS, the matter of Resolution No. 1868 was presented to the City  
2 Council on July 7, 2020; and,

3           WHEREAS, on July 7, 2020, the City Council set a public hearing for the  
4 EIR, General Plan Amendment No. GPA-202-003, Specific Plan Amendment No.  
5 SPA-2020-001, Zone Change No. ZC-2020-001, Zoning Code Amendment No. ZCA-  
6 2020-002, Ordinance Amending the Inglewood Municipal Code, Adoption of SEC  
7 Development Guidelines, and the Development Agreement By and Between  
8 Murphy's Bowl, LLC and the City of Inglewood before the City Council in the City  
9 Council Chamber, Ninth Floor of Inglewood City Hall, on the 21<sup>st</sup> day of July 2020.  
10 Notice of the time and place of the hearing was given in compliance with legal  
11 requirements. The EIR was transmitted to the City Council prior to the hearing;  
12 and,

13           WHEREAS, on July 21, 2020, the City Council conducted the hearing at the  
14 time and place stated above and afforded all persons interested in the matter of  
15 the EIR, or in any matter or subject related thereto, an opportunity to appear  
16 before the City Council and be heard and to submit testimony or evidence in favor  
17 of or against the EIR; and,

18           WHEREAS, the City Council considered the EIR and testimony and  
19 information received at the public hearing related to the Project, including  
20 without limitation, the oral and written reports from City staff, oral reports from  
21 City consultants, as well as the EIR.

22 **SECTION 2.**

23           **NOW, THEREFORE, BE IT RESOLVED, BY THE CITY COUNCIL OF**  
24 **THE CITY OF INGLEWOOD, CALIFORNIA:**

25           Based on the entirety of the materials before the City Council, including  
26 without limitation, agenda reports to the City Council and Planning Commission,  
27 the EIR and all appendices thereto and supporting information; this Resolution  
28 and its attached exhibits, all plans, drawings, and other materials submitted by

1 the Project Sponsor; Planning Commission Resolution No. 1868, minutes, reports,  
2 and public testimony and evidence submitted as part of the Planning  
3 Commission's and City Council's duly-noticed meetings regarding the IBEC  
4 Project; the record of proceedings prepared in connection with AB 987 pursuant  
5 to Public Resources Code section 21168.6.8; and all other information contained  
6 in the City's administrative record concerning the Project (collectively, the  
7 Record), which it has carefully reviewed and considered, the City Council finds  
8 and certifies as follows:

9       1.     That the foregoing Recitals are true and correct and made part of this  
10 Resolution.

11       2.     That all procedural requirements for the City Council to certify this  
12 EIR have been followed.

13       3.     That the EIR, as prepared for the Project, complies with CEQA and  
14 the State and local environmental guidelines and regulations.

15       4.     That the EIR was presented to the City Council, and that the City  
16 Council has independently reviewed and considered the information contained in  
17 the EIR, including the written comments received during the EIR public review  
18 period and the oral and written comments received at the public hearings, prior  
19 to making its decision.

20       5.     That the EIR reflects the City's independent judgement and analysis  
21 on the potential environmental impacts of the Project. The EIR adequately  
22 discloses information to the decisionmakers and the public related to the  
23 environmental impacts of the Project.

24       6.     That the EIR adequately describes the Project, its environmental  
25 impacts, mitigation measures and a reasonable range of alternatives to the  
26 Project.

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1           7.     That the public review period provided all interested jurisdictions,  
2 agencies, organizations, and individuals the opportunity to submit comments  
3 regarding the Draft EIR.

4           8.     That the mitigation measures which have been identified for the  
5 Project were identified in the EIR. The final mitigation measures are described in  
6 the MMRP. Each of the mitigation measures identified in the MMRP, and  
7 contained in the EIR is incorporated into the Project. The impacts of the Project  
8 have been mitigated to the maximum extent feasible by the mitigation measures  
9 identified in the MMRP and contained in the EIR.

10          9.     That the Responses to Comments in the Draft EIR, as set forth in the  
11 Final EIR, are adequate and complete.

12          10.    That the Final EIR (including the Errata to the Final EIR) contains  
13 additions, clarifications, modifications and other information in its responses to  
14 comments on the Draft EIR and also incorporates minor revisions to the Draft EIR  
15 based on information obtained since the Draft EIR was issued. The Planning  
16 Department staff has made every effort to notify the decision-makers and the  
17 interested public/agencies of each textual change in the various documents  
18 associated with the Project review, including making these revisions available on  
19 the Project website maintained by the lead agency. These textual refinements  
20 arose for a variety of reasons. First, it is inevitable that draft documents would  
21 contain minor errors and would require clarifications and corrections. Second,  
22 textual clarifications were necessitated in order to describe refinements suggested  
23 as part of the public participation process and further discussions with the  
24 Planning Department staff.

25          11.    That, as described in the CEQA Findings and MMRP attached as  
26 Exhibits B and C, which are incorporated by reference as though fully set forth  
27 herein, the EIR identifies certain significant environmental impacts of the Project,  
28 many of which can be reduced to a level of less than significant based on feasible

1 mitigation measures identified in the EIR and as set forth in the CEQA Findings  
2 and MMRP. However, as further described in Exhibit B, a Statement of  
3 Overriding Considerations has been prepared for certain impacts of the Project  
4 that remain significant and unavoidable even after the adoption of all feasible  
5 mitigation measures specified in the EIR and the MMRP.

6 12. That the MMRP identifies the significant impacts of the Project,  
7 corresponding mitigation measures, and designates the City department  
8 responsible for implementation and monitoring of the required mitigation  
9 measures.

10 13. That any changes and additional information in the Final EIR  
11 (including the Errata to the Final EIR) are not considered significant new  
12 information as that term is defined under CEQA such that recirculation of the  
13 Draft EIR would be required. (See CEQA Guidelines, § 15088.5.) Any changes and  
14 additional information do not indicate that any new significant environmental  
15 impacts not previously evaluated in the Draft EIR would result from the Project  
16 nor do they reflect a substantial increase in the severity of any previously  
17 identified environmental impact. Further, no feasible mitigation measures  
18 considerably different from those previously analyzed in the Draft EIR have been  
19 proposed that would clearly lessen the significant environmental impacts of the  
20 Project, and no feasible alternatives considerably different from those analyzed in  
21 the Draft EIR have been proposed that would clearly lessen the significant  
22 environmental impacts of the Project. Accordingly, the City Council hereby finds  
23 and determines that recirculation of the EIR for further public review and  
24 comment is not required under CEQA.

25 **SECTION 3.**

26 BE IT FURTHER RESOLVED, that pursuant to the foregoing recitations  
27 and findings the City Council of the City of Inglewood, California, hereby:

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- a. Certifies the EIR based on the facts and findings set forth in this Resolution;
- b. Approves and adopts the CEQA Findings including a Statement of Overriding Considerations, for those Project impacts that remain significant and unavoidable after the adoption of all feasible mitigation measures specified in the EIR and the MMRP, as attached to this Resolution as Exhibit B.
- c. Approves and adopts the MMRP attached to this Resolution as Exhibit C.

**SECTION 4.**

BE IT FURTHER RESOLVED, this resolution certifying the Final Environmental Impact Report (EA-EIR-2020-45), adopting CEQA Findings and a Statement of Overriding Considerations, and adopting the MMRP is passed, approved and adopted this 21<sup>st</sup> day of July 2020.

The City Clerk shall certify to the passage and adoption of this Resolution and to its approval by the City Council and this resolution shall be in full force and effect immediately upon adoption.

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**James T. Butts**  
**Mayor**

**ATTEST:**

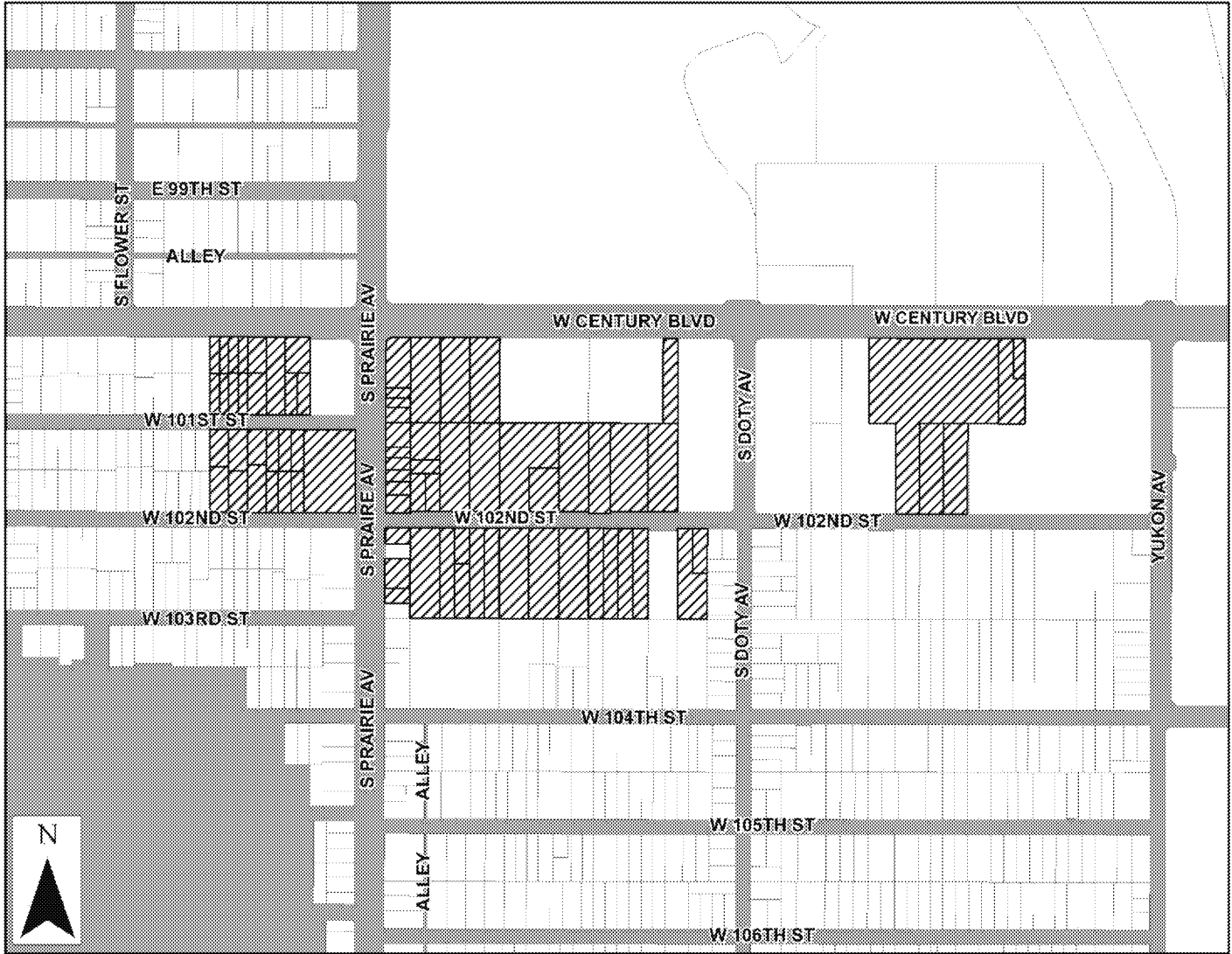
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**Yvonne Horton**  
**City Clerk**

EIR Resolution

Exhibit A:

IBEC Area Map



EIR Resolution

Exhibit B:

CEQA Findings and Statement of Overriding Considerations

## **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 C. The MMRP is required by PRC section 21081.6, subdivision (a)(1), and CEQA Guidelines sections 15091, subdivision (d), and 15097. Exhibit C 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 C 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 C also states this requirement. Exhibit C also sets 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 C. 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.

The MMRP also reflects revisions to mitigation measures that have been made after the City published the Final EIR and are included in the EIR Errata which is incorporated as part of the Final EIR. The revisions are designed to clarify the mitigation measures incorporated into the Project, and include refinements suggested as part of the public participation process and further discussions with the staff of the City's Economic and Community Development Department. The City has reviewed carefully these revisions. None of the revisions relaxes or substantially alters the mitigation measures set forth in the Final EIR. In every instance, the revisions make the measures no less stringent than those set forth in the Final EIR.

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 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 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 (LA) 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, and be integrated with, 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.

- 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.

The Project approvals provide flexibility for the project applicant to incorporate the West Century Boulevard Pedestrian Bridge Variant (see EIR pages 5-2 to 5-12) into the Project, at its election, subject to obtaining necessary third-party property rights and authorizations on the north side of West Century Boulevard.

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®) 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.

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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.



## **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 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:

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. On June 17, 2020, following a public hearing, the City Planning Commission adopted a resolution recommending that the City Council certify the Final EIR, adopt these findings, approve the MMRP, and adopt a statement of overriding considerations.

j. 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).

k. 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.

1. 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.
- (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.

<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.

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
  - 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 NO<sub>x</sub> and 10 tons of PM<sub>2.5</sub> over the 10 years following the commencement of construction of the Project. Of these amounts, a 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.
- Approval of a Specific Plan Amendment to the Inglewood International Business Park Specific Plan to exclude parcels 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 other Inglewood Municipal Code chapters, as necessary, including but not limited to, Chapters 2, 3, 5, 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 the acceptance of certain Successor Agency-owned parcels within the Project Site conveyed 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) and/or lot line adjustments 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:

- Approval of the transfer of certain Successor Agency-owned parcels within the Project Site to the City of Inglewood.
- Determination of consistency with the LAX Airport Land Use Plan by the Los Angeles County Airport Land Use Commission. On July 1, 2020, the Los Angeles County Airport Land Use Commission adopted a finding that the Project is consistent with the LAX Airport Land Use Plan.
- 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), available at <http://www.ibecproject.com/>, 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 EIR and all documents referenced in or relied upon by the 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.
- 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 City Council notes, however, that the record of proceedings does not include internal "working draft" documents that have not been shared with the public; rather, such documents reflect the practical reality that a given document often undergoes multiple drafts before it is released to the public, relied upon by the City, or presented to decisionmakers. Just as the first draft of a legal brief or of a judicial opinion is not relevant to document in its final, filed form, the internal working draft of City staff or consultants is not relevant to the City Council's decision. Such documents are therefore not part of the record of proceedings.

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. The City may also be contacted by e-mail at [ibecproject@cityofinglewood.org](mailto:ibecproject@cityofinglewood.org). 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 implementing the mitigation measure or alternative resides with another agency. (Pub. Resources Code, § 21081, subd. (a)(2); CEQA Guidelines, § 15091, subds. (a), (b).)

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 rely 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 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 C), 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 incorporates 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**

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 confine all direct rays of artificial light within the boundaries of the Project Site, thereby avoiding 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 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:

- Document and respond to each lighting complaint.
- Attempt to contact the person(s) making the lighting complaint as soon as feasible and no later than one construction work day.
- Conduct a prompt investigation to attempt to determine if high-brightness construction-related lighting contributes a substantial amount of light spillover or glare related to the complaint.
- If it is reasonably determined by the Community Affairs Liaison that high-brightness construction-related lighting causes substantial spillover light or glare to a light-sensitive receptor, the Community Affairs Liaison shall identify and implement measures to address the lighting complaint, to the extent that they can be accomplished, with equipment that is commercially available, and without extending the construction schedule or compromising worker safety.

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

- Confirming construction lighting equipment and related direction and shielding devices are maintained per manufacturer's specifications;
  - Ensuring construction lighting is not operated unnecessarily; and/or
  - Evaluating and implementing feasible relocations of lighting equipment, alternatives to specific types of lighting equipment, or changes to direction and shielding equipment, as appropriate.
- 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 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.
- 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 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 3.4-1 (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 3.4-1(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 3.4-1(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 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, which shall include:
    - 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 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 would be utilized for the employees. Shuttle service shall begin no less than two hours before the major event and extend to at least 30 minutes after the start of the event. After the major 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 3.14-2(b), 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 3.14-3(f), which requires constructing a dedicated northbound right-turn lane that 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
  - 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 on all event days.
- 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 reducing single-occupancy vehicle trips and increasing the use of other modes of transportation besides automobile to travel to basketball games and other events hosted at the Project.
- 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 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, verifiable, real, and enforceable. The methodology for ensuring that each of the six "environmental integrity standards" listed in the immediately preceding sentence shall be that all carbon offset credits used to meet the requirements of this paragraph have been implemented, independently verified, and enforced in accordance with the objective criteria detailed in any one or more of the following Protocols,

Methodologies, and/or Standards (“Protocols” are promulgated by the Climate Action Reserve (“CAR”) while the American Carbon Registry (“ACR”) and Verra (“VCS”) use the terms “Standards” and “Methodologies”): (1) U.S. Forestry (CAR Version 5.0; ACR Version 6.0 and Methodologies authorized thereby), (2) Urban Tree Planting (CAR Version 2.0), (3) Livestock Digesters (CAR Version 4.0), (4) Ozone Depleting Substances (CAR version 2.0), (5) Mine Methane Capture (CAR Version 1.1), (6) Rice Cultivation (CAR Version 1.1), (7) U.S. Landfill (CAR Version 5.0; VCS Version 4 and Methodologies authorized thereby), (8) Grasslands (CAR Version 2.1; ACR Version 6.0 and Methodologies authorized thereby), and (9) Green Energy (ACR Version 6.0 and VCS Version 4, and Methodologies authorized thereby). Without limiting the generality of the foregoing, in the event that an approved registry becomes no longer approved by CARB and the offset credits cannot be transferred to another approved registry, the project applicant shall comply with the rules and procedures for retiring and/or replacing offset credits in the manner specified by the applicable Protocol, Standard or Methodology, including (to the extent required) by purchasing an equivalent number of credits to recoup the loss. In order to account for changing technologies and improved methodologies during the operational life of the project, the project applicant may utilize updated versions of the Protocols, Standards, or Methodologies promulgated from time to time by an approved registry if the project applicant provides written documentation to the City as a component of its Annual GHG Verification Report (a copy of which is provided to CARB), demonstrating that the updated version is at least as effective as the versions expressly enumerated above; additionally, the project applicant may utilize carbon offset credits generated by a project approved under an earlier version of an applicable Protocol, Standard, or Methodology to the extent authorized by the later version of the applicable Protocol, Standard, or Methodology.

Carbon offset credits generated by a project located outside the United States or its territories shall not be used to satisfy this measure.

- 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.

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 shall select and consult with a qualified expert greenhouse gas emissions verifier accredited by the ANSI National Accreditation Board (ANAB) Accreditation Program for Greenhouse Gas Validation/Verification Bodies or a Greenhouse Gas Emissions Lead Verifier accredited by CARB, or an expert with equivalent qualifications to the extent necessary to assist with this review. 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 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 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. (An ALUC Consistency Determination was issued on July 1, 2020.)

**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 Measure 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 Dominquez 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 Measure 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 shall 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 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.

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 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 carpool and ZE vehicles, active transportation, employee vanpools, a park-n-ride program, and information services; and programs to reduce on-site parking demand, including event-day local microtransit service.

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 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 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 NOx emissions during construction, and a cumulatively considerable net increase in VOC, NOx, 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 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 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 that are part of a fleet of a transit operator are determined by the City to be available and are sufficient to meet the operational requirements of the TDM Program described in Mitigation Measure 3.14-2(b), 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 NOX. 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 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 relative to the 5 dBA over ambient significance threshold. 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, to the extent that they can be accomplished, with equipment that is commercially available, and without extending the construction schedule or compromising worker safety:

- 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.
- 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 required by the Contractor, an exhaust muffler on the compressed air exhaust and external jackets shall be used to lower noise levels. Quieter procedures shall be used, such as drills rather than impact equipment.
- Stationary noise sources (e.g., generators) shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures. Pole power shall be utilized in lieu of generators at the earliest possible point in time. 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), 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 around the Project Site, in adjacent public spaces, and in construction notifications. If the Community Affairs Liaison hotline is not staffed 24 hours per day, the hotline shall provide an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. The Community Affairs Liaison shall be responsible for responding to any local complaints about 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.
- 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 measures within the Project Site to address the noise complaint, to the extent that such measures can be accomplished, with equipment that is commercially available, and without extending the construction schedule or compromising worker safety.

Examples of 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 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 relative to the 3 dBA over ambient significance threshold. The level of noise reduction to be achieved by the Operations Noise Reduction Plan shall be documented by a qualified noise consultant and submitted to the City. The Operations Noise Reduction Plan shall be submitted to and approved by the City prior to the issuance of the first Plaza building permit and verified prior to the issuance of the Certificate of Occupancy for the first Plaza Building, and revised on an as-needed basis to address noise-related design details added thereafter.

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.
- Locate, 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.
- 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 project applicant 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. 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 measures to address the vibration complaint, to the extent that such measures can be accomplished, with equipment that is commercially available, and without extending the construction schedule or compromising worker safety.

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

- Confirming construction equipment is maintained per manufacturer's specifications;
- Ensuring construction equipment is not operated unnecessarily; and/or
- Evaluating and implementing any 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

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

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.

**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 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 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.

**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 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, which shall include:
  - 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, discounted rides (or other similar benefits) for those sharing TNC rides to or from the event, 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.
  - 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, and achieving the identified standards for each of these issues.

**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, which shall include:
  - 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 major event and extend to 30 minutes after the start. After the major event, shuttle service would begin 30 minutes before the end, and continue 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.
- c) TDM 3/Encourage Carpools and Zero-Emission Vehicles – The 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:
- 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.
- 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 shall have a capacity of no less than 10 persons per vehicle and shall provide service to employees and event 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 reducing single-occupancy vehicle trips and increasing the use of other modes of transportation besides automobile to travel to basketball games and other events hosted at the Project.

**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 as a result of further engineering review by LADOT, 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.

**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 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).) Because 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.

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. Because 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. 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/Centinela Avenue intersection to better than the 'no project' condition, thereby mitigating this impact to less than significant.

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
- 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 as a result of further engineering review by LADOT, 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.

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

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 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.

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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.

**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). 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.

**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 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.

**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 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.
- 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

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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.)

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. Because 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. (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).

**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/Centinel Avenue Improvements).

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

**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 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.

**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.

**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 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).

**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 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 is necessary to account for a multitude of overlapping variables that are infeasible to fully identify and plan for at this time. 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) require 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).

**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 there are no assurances that the plan will be implemented by third-parties (such as the NFL Stadium operator) and/or that the plan will 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 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			
Comment	Comment	Disposition	Explanation
PETA-3 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</p>

Mitigation Measures Proposed in Comments on Draft EIR			
Comment	Comment	Disposition	Explanation
			<p>from the City of San Francisco Planning Department’s Design Guide Standards for Bird-Safe Buildings. As the Proposed Project is currently in design development, these goals are influencing the further design evolution of the Proposed Project.</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</p>

Mitigation Measures Proposed in Comments on Draft EIR			
Comment	Comment	Disposition	Explanation
			<p>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 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>

Mitigation Measures Proposed in Comments on Draft EIR			
Comment	Comment	Disposition	Explanation
			<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 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, Bird Collision Deterrence, <a href="https://www.usgbc.org/credits/new-construction-core-and-shell-">https://www.usgbc.org/credits/new-construction-core-and-shell-</a></p>

Mitigation Measures Proposed in Comments on Draft EIR			
Comment	Comment	Disposition	Explanation
			<p>schools-new-construction-retail-new-constructionhealthc212?view=language&amp;return=/credits/New Construction/v4.1, 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	<p>“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 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>The proposed mitigation measures (1) address impacts that are not significant and for which no mitigation is required, (2) would be ineffective at addressing the project’s significant impacts, or (3) are considered infeasible.</p>	<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 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.</li> <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> </ul>

Mitigation Measures Proposed in Comments on Draft EIR			
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			<ul style="list-style-type: none"> <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 extensive design features and mitigation measures to address the project's noise impacts during both construction and operations. The impact, however, remains significant.</li> <li>• Construction noise impacts are intermittent and temporary. For this reason,</li> </ul>

Mitigation Measures Proposed in Comments on Draft EIR			
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			<p>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.</p> <ul style="list-style-type: none"> <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</p>



Mitigation Measures Proposed in Comments on Draft EIR			
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			<p>unnecessary, ineffective or infeasible.</p> <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>
LACDPW1-7	<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> </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</p>

Mitigation Measures Proposed in Comments on Draft EIR			
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	<ul style="list-style-type: none"> <li>Provide an event management plan to Public Works for review.</li> </ul>		<p>measures were identified which could feasibly reduce or eliminate some or all of the identified significant impacts. Mitigation Measure 3.14-2(b) would require the implementation of a TDM Program to reduce Project-related trips, which would in turn reduce the magnitude of Project impacts at all impacted intersections. Mitigation Measure 3.14-2(c) would require physical modifications to mitigate impacts at the Century Boulevard/La Cienega Boulevard intersection. Mitigation Measure 3.14-3(o) would require coordination of traffic signals and optimization of traffic signal timings at intersections along West Century Boulevard. No feasible mitigation measures were identified at the remainder of the impacted County intersections. As discussed on pages 3.14-189 and 3.14-190 of the Draft EIR, the majority of the study area is built out, which limits the locations, magnitude, and types of physical improvements that could be constructed on surface streets. Physical 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>County of Los Angeles Department of Public Works (LACDPW)</p> <p>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</p>

Mitigation Measures Proposed in Comments on Draft EIR			
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			<p>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 Espinoza-3	<p>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 Uber/Lyft drivers.</p>	<p>This proposal is unwarranted. The project includes telecommunications facilities. The project is not expected to have adverse impacts 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>The comment is correct that large crowds at event venues, such as The Forum, may place increased demands on the capacity of telecommunications facilities. If many patrons attempt to use cell phones at the same time, including connections to ride-hailing services, the capacity of nearby digital systems may be insufficient, leading to slow service, lack of connection, or dropped calls. These peaks in demand may occur immediately before or after events.</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-</p>

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			<p>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 Project’s Event TMP and TDM program. See Response to Comment Espinoza-2.</p>
<p>SCAQMD3-5 SCAQMD3-14 SCAQMD3-15</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,</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</p>

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	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>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, 2020.</p>
SCAQMD3-18	<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</li> </ul>	This proposal is infeasible.	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

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	<p>must use each year during construction to ensure adequate progress. Include this requirement in the Proposed Project's Construction Management Plan.</p>		<p>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>	<p>This proposal is infeasible.</p>	<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 trucks. Include this policy in the vendor contracts and business agreements.</li> </ul>	<p>This proposal is infeasible.</p>	<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 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;</i></p>

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			<p><i>Entertainment Center Draft EIR: Review of Suggested Mitigation Measures, May, 2020.</i>) 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</li> </ul>	This proposal is infeasible.	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

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	purchase orders with vendors.		the limited categories of ZE commercially available trucks, it would be infeasible to require 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.
SCAQMD3-19	Presence of hexavalent chromium has been detected at the Proposed Project site. The Lead Agency should require dust	This proposal is already incorporated into the project pursuant to Mitigation Measure	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



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<b>Comment</b>	<b>Comment</b>	<b>Disposition</b>	<b>Explanation</b>
	control measures in accordance with South Coast AQMD Rule 1466, as applicable. Rule 1466 includes a list of dust control measures to reduce fugitive dust emissions from toxic air contaminants, such as hexavalent chromium, during earth-moving activities. 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.	3.8-4 and the requirement to prepare a Soil Management Plan (SMP). The text of the Draft EIR has been revised to reference SCAQMD rule 1466.	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 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.
SCAQMD3-20 SCAQMD3-6	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	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	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

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	need to be monitored for VOC concentrations, and notification, work practice, and handling requirements will need to be implemented for elevated VOC readings. A Rule 1166 excavation plan application will need to be submitted to South Coast AQMD, or the site may be able to utilize a various locations plan. In addition, a discussion should be included regarding the treatment and handling of any VOC-contaminated soil. Therefore, South Coast AQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with South Coast AQMD Rule 1166 in the Final EIR. South Coast AQMD Rule 1166 should be incorporated in the soil management plan.	revised to reference SCAQMD rule 1166.	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.
Caltrans-5 Caltrans-6	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	This proposal has been incorporated into the project.	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:  <b>Mitigation Measure 3.14-24(h)</b>  <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</i>

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	<p>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, 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.</p>		<p><i>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 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.</p>
Caltrans-7	<p>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</p>	<p>This concern has been addressed. The queue length would not exceed the available storage threshold, so secondary impacts would not occur.</p>	<p>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</p>

<sup>6</sup> Fehr & Peers, *Technical Memorandum, IBEC Contribution to Caltrans' I-405 ATM/CM Project*, May 7, 2020.

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	justify that the mitigation measure at the I-405 NB off-ramp at West Century Blvd will not lead to significant impacts.		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	<p>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 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>	This proposal is infeasible.	<p>Mitigation for the impact at this on-ramp is infeasible for the following reasons:</p> <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 second exclusive right-turn lane would create a trap situation for non-HOV right-turning movements.</li> <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>

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			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.
	<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 incorporated 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</li> </ul>

Mitigation Measures Proposed in Comments on Draft EIR			
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			<p>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.</p> <ul style="list-style-type: none"> <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 consideration be given to adding a second left-turn lane to the eastbound 120th Street approach at the intersection and has indicated that they believe that the second eastbound left-turn lane could potentially fit within the constraints of the existing pavement width. The City of Inglewood is amenable to this improvement subject to the following conditions:</p>

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			<ul style="list-style-type: none"> <li>• The improvement fits within the existing pavement width and does not require widening. As noted above, widening the existing pavement is constrained by the Dominguez Channel, water well, and Hawthorne Airport.</li> <li>• The substandard lane widths and the offsets that this would require on 120th Street would be acceptable to both the City of Hawthorne and Caltrans.</li> <li>• Caltrans agrees to either convert the existing HOV bypass lane on the on-ramp to a general-purpose lane or restricts the new #1 eastbound left-turn lane to HOV-only, creating the trap-lane situation described above.</li> </ul> <p>The City of Hawthorne has also indicated that, should the second eastbound left-turn lane prove to be infeasible in consultation with the City of Inglewood and Caltrans, an alternative improvement could be to extend the length of the single existing eastbound left-turn lane, thus providing additional storage space for eastbound left-turning vehicles. The City of Inglewood is amenable to this improvement subject to the following conditions:</p> <ul style="list-style-type: none"> <li>• The improvement fits within the existing pavement width and does not require widening.</li> <li>• The substandard lane widths that this would require on 120th Street would be</li> </ul>

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			<p>acceptable to both the City of Hawthorne and Caltrans.</p> <ul style="list-style-type: none"> <li>Accordingly, this mitigation measure is added following Mitigation Measure 3.14-2(o) on page 3.14-200 of the Draft EIR:</li> </ul> <p><b>Mitigation Measure 3.14-2(p)</b></p> <p>The project applicant shall work with the City of Inglewood, the City of Hawthorne, and Caltrans to investigate the feasibility of adding a second eastbound left-turn lane or extending the length of the single existing left-turn lane on 120th Street at the I-105 Eastbound On/Off Ramps within the existing pavement width and, if determined to be feasible within the existing pavement width, to implement the improvement.</p> <p>Because the feasibility of Mitigation Measure 3.14-2(p) is not presently known and its implementation requires approvals from other jurisdictions beyond the City of Inglewood, its implementation cannot be guaranteed and the impact is considered to be significant and unavoidable. See Response to Comment Caltrans-9.</p>
	<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</li> </ul>



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			<p>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.</p> <ul style="list-style-type: none"> <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>
Caltrans-15	Provide multi-modal improvements and encourage active transportation.	The project already provides multi-modal improvements to encourage active transportation.	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 interaction of pedestrians and vehicles (part of the TMP required in

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			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 Manual on Uniform Devices.	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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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.  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

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			<p>receptor by means of acoustical enclosures, silencers, barriers, relocation, and/or other noise-reducing approaches.”</p> <p>See Response to Comment Channel-22.</p>
	<p>Timing of preparation of Noise Reduction Plan.</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 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).</p>
	<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</p>

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			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).
	The use of sound-absorbing materials on Plaza buildings will be ineffective.	The use of sound-absorbing materials as one potential means of addressing noise impacts is appropriate.	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.”
	Insufficient evidence to support the proposal to enclose the rooftop restaurant with a noise barrier.	The mitigation measure focusing on this impact has been revised to address this concern.	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 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.
Channel-24	The EIR must impose a mitigation measure requiring enclosure of the rooftop restaurants and define maximum volumes for amplified music and stage activities.	The mitigation measure focusing on this impact has been revised to address this concern.	Mitigation Measure 3.11-2(a) has been revised to require implementation of mandatory noise reduction measures including, in relevant part, the following: <ul style="list-style-type: none"> <li>• Enclose the rooftop restaurant space with a material such as glass, with a</li> </ul>

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			<p>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.</p> <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: <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</li> </ul> </li> </ul>

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			<p>near noise-sensitive receptors.            &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.</p> <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 LADOT-9	For MM 3.14-1(a), Event Transportation Management Plan – include language that requires communication with LADOT Special Traffic Operations staff to	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:  <i>LADOT manages and maintains streets and other local roads in the City of Los Angeles.</i>



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	ensure that appropriate measures are considered to address potential event related queuing conditions on street traffic managed by LADOT.		<p><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) 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	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.	The mitigation measure has been revised as requested by the comment.	<p>Mitigation Measure 3.14-2(c) has been revised to add the following language:</p> <p><i>Should these improvements be deemed infeasible as a result of further engineering review by LADOT, 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	For MM 3.14-3(j), Centinela Ave/La Cienega Blvd Physical Improvement – include language that requires the project to provide a	The mitigation measure has been revised as requested by the comment.	<p>Mitigation Measure 3.14-3(j) has been revised to add the following language:</p> <p>Mitigation Measure 3.14 3(j)</p>

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	commensurate substitute mitigation should the proposed mitigation be deemed infeasible.		<p>... Should these improvements be deemed infeasible as a result of further engineering review by LADOT, 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.</p> <p>See Response to Comment LADOT-7.</p>
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.
LADOT-10	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.	A mitigation measure has been developed in consultation with LADOT; such mitigation is incorporated into the Project.	<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><b><i>Mitigation Measure 3.14-18(s)</i></b></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</i></p>

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			<p><i>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 / 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>

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Metro-12	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.	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.	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.
Metro-13	Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be ADA-compliant.	This proposal is noted. Any modifications to bus stops will comply with applicable standards, including ADA requirements.	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.
Metro-14	Metro recommends that the following information be included in the Project's Construction Traffic Management Plan:  "The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days	Mitigation incorporated into the project has been revised to include this proposal.	Mitigation Measure 3.14-15(g) has been revised to include the following footnote  <i>The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also</i>

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	before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.”		<i>be impacted and shall be included in construction outreach efforts.</i> 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 stadium.

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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</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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	passes) to attendees inside the arena or on the property to help alleviate overcrowding at rail station ticket vending machines after events.		
NRDC-9	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.	These proposals are infeasible. Mitigation has been revised, however, to require ZE buses in the event they become commercially available.	<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 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</p>

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			<p>feasible and has been incorporated into Mitigation Measure 3.2-2 as an additional requirement:</p> <p><b><i>Mitigation Measure 3.2-2(e)</i></b></p> <p><i>If ZE or NZE shuttle buses that are part of a fleet of a transit operator are determined by the City to be available and are sufficient to meet the operational requirements of the TDM Program described in Mitigation Measure 3.14-2(b), 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 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.	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. 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



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			<p>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 than their</p>

Mitigation Measures Proposed in Comments on Draft EIR			
Comment	Comment	Disposition	Explanation
			<p>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 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.</p>

<b>Mitigation Measures Proposed in Comments on Draft EIR</b>			
<b>Comment</b>	<b>Comment</b>	<b>Disposition</b>	<b>Explanation</b>
			See Responses to Comments SCAQMD3-14 and NRDC-9.
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 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	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

<b>Mitigation Measures Proposed in Comments on Draft EIR</b>			
<b>Comment</b>	<b>Comment</b>	<b>Disposition</b>	<b>Explanation</b>
		project's GHG emissions.	time and calculating the reduction in air pollutants and GHGs would be too speculative. Nevertheless, the efficacy of the TDM program in reducing GHG emissions 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 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	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	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	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

Mitigation Measures Proposed in Comments on Draft EIR			
Comment	Comment	Disposition	Explanation
	<p>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> <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</li> </ol>	<p>local reduction measures, both of which are effective in offsetting GHG emissions.</p>	<p>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>Finally, as a result of the Court of Appeal’s decision in <i>Golden Door Properties, LLC v. County of San Diego</i> (2020) – Cal.App.5th – [slip op. dated June 12, 2020], the City revised Mitigation Measure 3.7-1. Under these revisions, to the extent the applicant relies on offsets to achieve the identified standard – no net new GHG emissions – those offsets must be real, quantifiable, additional, verifiable, permanent and enforceable. Mitigation Measure 3.7-1 also includes monitoring and reporting requirements to ensure that these standards are met.</p> <p>See Response to Comment NRDC-9 and Memorandum from Brian Boxer and Christina Erwin, ESA, to Mindy Wilcox, City of Inglewood, <i>Responses to Late Comments</i> (July 15, 2020), Response to Letter 18 (NRDC).</p>

<b>Mitigation Measures Proposed in Comments on Draft EIR</b>			
<b>Comment</b>	<b>Comment</b>	<b>Disposition</b>	<b>Explanation</b>
	units throughout Inglewood 11. Promotion of anti-displacement measures throughout Inglewood		
NRDC-10 NRDC-11	The Project must mitigate impacts resulting from displacement.	Mitigation for displacement impacts is not required.	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.
West Basin-2	West Basin respectfully requests that a small area (approximately 1,000 square feet) of the Proposed Project property be designated for a future recycled water disinfection station.	This proposal is not required.	The City remains committed as part of its current and continuing discussions with the West Basin Municipal Water District to assist it with finding an acceptable alternative site. 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.

## **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>

<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 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.)

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) 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

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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").



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-tenanted.

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 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; see also *Uplift Inglewood Coalition v. City of Inglewood*, Case No. BS172771 (Los Angeles County Superior Court), Judgment Entered November 14, 2019 [describing history of site, including acquisition of residential uses under FAA's grant program].)

### **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 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.

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

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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).

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 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:

- Construction of the smaller Alternative 2 would result in approximately 1,109 fewer jobs, with construction employee compensation reduced by a net of approximately \$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 approximately 545 jobs, with annual employee compensation reduced by approximately \$38.7 million, and annual total economic activity reduced by approximately \$81.6 million.

(ESA Alternatives Memo, p. 6.)

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. (*Ibid.*)

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 1c) 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. (See Bill Hanway, Executive Vice President, Global Sports Leader, AECOM, letter to Chris Holmquist, Wilson Meany Re: *Design and Operations Considerations of EIR Alternatives*, May 7, 2020 [discussing operations requirements for NBA arenas].)

### **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 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 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).

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 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 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,

<sup>10</sup> Memorandum – IBEC Alternative 2 – Wastewater & Solid Waste Generation, July 18, 2019.

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 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. This alternative, 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 approximately 1,100 construction jobs and approximately 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 approximately \$82 million in economic activity in the City, and approximately \$2.8 million in annual revenues to the City and approximately \$176,200 in fees to the Inglewood Unified School District would be eliminated. (*Ibid.*)

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.

Alternative 2 would also result in the loss of amenities and the inability to hold pre- and post-game events. Alternative 2 would therefore diminish the customer and fan experience. (ESA Alternatives Memo, pp. 8-9.) In addition, the presence of these amenities has a beneficial effect on travel patterns for those attending events at the Arena; the loss of these amenities would have a deleterious effect on traffic. (ESA Alternatives Memo, pp. 9-10.)

Alternative 2 would be less responsive than the Project with respect to the requirements of the City's FAA AIP grants. (ESA Alternatives Memo, p. 10.)

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.

## **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, 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 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, pp. 10-11.)

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, p. 11.)

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. (See ESA Alternatives Memo, p. 13.)

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).

### **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,

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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.

<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.

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 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.

<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.

<sup>15</sup> State Water Resources Control Board, 2019. GeoTracker database. Accessed: May 9, 2019.

## **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 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.

## **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 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 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 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

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<sup>16</sup> Memorandum – IBEC Alternative 3 – Wastewater & Solid Waste Generation, July 18, 2019.



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 Project Site. Nevertheless, 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. 12.)

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, pp. 14-15.)

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 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 (the 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 Marlton 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.

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).

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 require 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.

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<sup>17</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016.

### ***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 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 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

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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 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.

### **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.

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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.

<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.



## 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 *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

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<sup>22</sup> City of Los Angeles, *Mobility Plan 2035, An Element of the General Plan*, Adopted January 2016.

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.

### ***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.

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<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.

## 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.

## 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

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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.

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 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

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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.

<sup>26</sup> City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.D.2-6.

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 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 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

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<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.

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 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, and 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

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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.

process would likely obstruct the ability to meet the applicant's schedule objective to open in time for the 2024-2025 NBA season. (ESA Alternatives Memo, p. 16.) 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. (*Ibid.*)

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.
- 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 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 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 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.)

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. 19.) 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. (ESA Alternatives Memo, pp. 19-20.) 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. (See Bill Hanway, Executive Vice President, Global Sports Leader, AECOM, letter to Chris Holmquist, Wilson Meany Re: *Design and Operations Considerations of EIR Alternatives*, May 7, 2020.)

### **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 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

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<sup>29</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018.

<sup>30</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. IV.E-7.

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 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.

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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.

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).

### **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

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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.

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.

### **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

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<sup>36</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-4.

<sup>37</sup> City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-6.

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 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 5 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.

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<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.

<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.

## 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 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 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 no 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.

## 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.

addition, the City would receive none of the substantial community benefits incorporated into the Development Agreement for the Project. (*Ibid.*)

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.
- 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 (multiple years based on the timing of the current remediation effort). 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 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 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 Adjusted Baseline about 750 feet to the west, and under cumulative conditions about 750 feet to the east.

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<sup>45</sup> City of Inglewood, 2009. *Hollywood Park Redevelopment Project EIR*. July 2009.



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 contamination have been remediated. However, it is possible that previously contaminated soils may still

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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.

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**

Alternative 6 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.

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. (*Ibid.*)

In addition to the above, Alternative 6 would not further some of the project applicant's objectives. 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. 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 please 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. 22-24.)

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 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 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.

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, 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.

### **Relationship to Project Objectives**

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 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 whether Alternative 7 would allow the applicant to begin hosting LA Clippers home games in the 2024–2025 season. (ESA Alternatives Memo, p. 24.) 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 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

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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.

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 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

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<sup>51</sup> State Water Resources Control Board, 2019. GeoTracker database. Accessed: May 9, 2019.

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 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.

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<sup>52</sup> Memorandum – IBEC Alternative 7 – Wastewater & Solid Waste Generation, August 23, 2019.

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 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 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 underdeveloped. 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:**

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>

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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.

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).

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:**

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. The team conducted a preliminary analysis of the Baldwin Hills Crenshaw Plaza Mall site east of Marlton 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, findings, and all other documents included in the record as described above). 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:

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.

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.

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.

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, 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 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/AIA 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

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<sup>54</sup> City of Inglewood, *General Plan Land Use Element*, January 1980, page 6.

<sup>55</sup> City of Inglewood, *General Plan Land Use Element*, January 1980, page 7.

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.

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; see also *Uplift Inglewood Coalition v. City of Inglewood*, Case No. BS172771 (Los Angeles County Superior Court), Judgment Entered November 14, 2019 [describing history of site, including acquisition of residential uses under FAA's grant program].

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" 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 Gold certification is anticipated to be achieved by the end of the first full NBA season. Key elements of the LEED Gold 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), 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 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, verifiable, real, 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 \$4.5 million in annual net tax revenues. The City retained Keyser Marston Associates ("KMA") as a consultant to peer review HR&A's fiscal impact analysis. 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.

The Project will also generate approximately \$72.4 million cumulatively in nominal property tax revenues over the 2020-2045 period 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. Additional information is provided in *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 7,020 full-time and part-time construction jobs on-site would be created, resulting in approximately \$450.4 million paid to those on-site construction workers. Pursuant to the Development Agreement (see section 8, below), a significant portion of these jobs will be available to Inglewood residents and businesses.

The operation of the IBEC, once constructed, would result in the creation of 1,476 full-time and part-time jobs on-site. The on-site workers would be paid \$134.7 million annually. Operation of the IBEC would result in 1,408 more jobs than currently exist on the site. 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 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.

EIR Resolution

Exhibit C:

Mitigation Monitoring and Reporting Program

# CHAPTER 4

## Mitigation Monitoring and Reporting Program

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### 4.1 Introduction

Public Resources Code section 21081.6 and section 15097 of the California Environmental Quality Act (CEQA) Guidelines require public agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated negative declaration or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the Inglewood Basketball and Entertainment Center (IBEC, or Project). The intent of the MMRP is to track and successfully implement the mitigation measures identified within the Final Environmental Impact Report (Final EIR) for the Project.

### 4.2 Mitigation Measures

The mitigation measures are taken from the Final EIR and are assigned the same number as in the Final EIR. The MMRP describes the actions that must take place to implement each mitigation measure, the timing of those actions, the entities responsible for implementing and monitoring the actions, and, where appropriate, the entities responsible for ensuring that reporting responsibilities are carried out. The mitigation measures identify the Project as the “Proposed Project;” this same terminology is used here in order to ensure that the measures in this MMRP track those set forth in the Final EIR.

In some instances, mitigation measures require the applicant to construct physical improvements. For those improvements within the jurisdiction of the City of Inglewood, where noted below, the City must review and approve the consultants retained to plan, design and construct the improvements. The City must also review and approve the plans, designs and construction of those improvements. For those improvements that fall within the jurisdiction of another agency, that other agency is identified; the applicant must work with that other agency on the design and construction of the improvement, and the City of Inglewood coordinates those efforts as necessary.

In some instances, mitigation measures require the applicant to retain or designate a monitor or community liaison. In those instances, the applicant must identify to the City the person or entity designated to perform this task, and the City will review that person or entity’s qualifications to confirm that the designee has the requisite expertise or qualifications.

The table also includes sections entitled “Project Design Features” and “AB 987.” This information is included for convenience and comprehensiveness. The items listed here are not “mitigation measures” for CEQA purposes. They instead serve different purposes. Specifically:

- “Project Design Features” consist of elements or features that have been incorporated into the project’s design by the Project Applicant. Because these features may serve to reduce the project’s environmental effects, they are included here in a separate table in order to ensure that the features are implemented.
- “AB 987” lists the conditions of approval incorporated into the project based on the Governor’s certification of the project under Assembly Bill 987 (Chapter 961, Statutes of 2018). AB 987 provides that the environmental measures required as a result of the certification process “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.” (Pub. Resources Code, § 21168.6.8, subd. (b)(5).) The conditions of approval arising under the AB 987 process are not mitigation measures for CEQA purposes, although they overlap with CEQA mitigation measures in some respects. The conditions of approval under AB 987 are separately listed here to provide a mechanism for the City to monitor and enforce them. Note that the statute requires the project applicant to “submit to the lead agency an annual status report on the implementation of the environmental mitigation measures and any other environmental measures required by this section.” (Pub. Resources Code, § 21168.6.8, subd. (b)(5).)

### 4.3 MMRP Components

The components of the attached tables, which contain applicable mitigation measures, are addressed briefly, below.

**Impact:** This column summarizes the impact stated in the Draft EIR, as revised in the Final EIR.

**Mitigation Measure:** All mitigation measures identified in the Draft EIR, as revised in the Final EIR, are presented and numbered accordingly.

**Implementing Party:** The column entitled “Implementing Party” identifies the entity that will undertake the required action. The Implementing Party is most often the Project Applicant (or Applicant), who will be responsible for the design, construction or operation of each site, phase, or component of the Project. The Project Applicant responsible for undertaking a required action may include the owner or operator of the Project component, as appropriate. In some instances, the required action will or should be undertaken by another party. This column therefore provides clarity regarding the entity that is primarily responsible for carrying out the action.

**Monitoring Party:** The City of Inglewood (the City) is primarily responsible for monitoring that mitigation measures are successfully implemented. Within the City, several departments and divisions would have responsibility for monitoring some aspect of the overall project. This column identifies the specific City department responsible for monitoring. Other agencies, such as the Los Angeles Regional Water Quality Control Board, may also be responsible for monitoring the implementation of mitigation measures.

The various departments within the City who are identified as an implementing or monitoring party include the: (1) the Economic and Community Development Department, which generally oversees the review approval, and inspection of all building projects within the City (Building Safety Division); enforces property maintenance, zoning, weed and waste Municipal Code requirements (Code Enforcement Division); (2) the Public Works Department, which helps to plan, design, inspect, and administer contracts for capital infrastructure construction and facility improvements projects (Engineering Division); manage the City's municipal solid waste services (Environmental Services Division); and assures that City transportation improvements and systems are functional and safe (Transportation & Traffic Division); and (3) the Parks, Recreation, and Community Services Department, which is charged with enhancing the quality of life for Inglewood residents, business, and visitors, through the provision of comprehensive recreational, social, and community beautification services and programs.

**Timing:** Implementation of the action must occur prior to or during some part of project approval, project design or construction or during ongoing project operations. The timing for each measure is identified in this column. In those instances in which the timing is tied to the issuance of a certificate of occupancy, a certificate of occupancy includes a temporary certificate of occupancy.

**Notes:** Certain measures assign the Project Applicant or an applicant-designated entity with reporting responsibility. In those instances, the MMRP identifies the party that must prepare a report so that the monitoring party can confirm that the applicant has fulfilled its responsibilities. This column also notes where the mitigation measure will be enforced in part by another agency or provides additional information that provide clarity concerning how the measure will be carried out.

**Acronyms:** The MMRP uses various following acronyms to refer to various City Departments or other agencies or entities. In some instances, the full name of the department or agency is used. The following agency or department acronyms are used throughout the MMRP:

<u>Name of Department or Agency</u>	<u>Acronym</u>
California Air Resources Board	CARB
City of Inglewood, Economic and Community Development Department	
Building Safety Division	ECDD-Building Safety Division
Planning Division	ECDD-Planning Division
City of Inglewood, Public Works Department:	
Engineering Division	DPW-Engineering Division
Environmental Services Division	DPW-Environmental Services Division
Transportation & Traffic Division	DPW-Transportation & Traffic Division



City of Los Angeles, Department of Transportation	LADOT
Federal Aviation Administration	FAA
Los Angeles County Health Hazardous Materials Division	HHMD
Los Angeles County Airport Land Use Commission	ALUC
Los Angeles Regional Water Quality Control Board	Los Angeles RWQCB
State of California, Governor's Office of Planning and Research	OPR
South Coast Air Quality Management District	SCAQMD
State of California, Department of Transportation	Caltrans

Other acronyms:

ITS	Intelligent Transportation Systems
LHAP	Local Hospital Access Plan
TDM	Transportation Demand Management
TCO	Traffic Control Officer
TMOP	Transportation Management and Operations Plan
TMP	Transportation Management Plan

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.1 Aesthetics</b>					
<p><b>3.1-2:</b> 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.</p>	<p><b>Mitigation Measure 3.1-2(a)</b>            Construction Lighting. The project applicant shall implement the following measures to avoid or minimize disturbances related to construction lighting:</p> <ul style="list-style-type: none"> <li>• Require construction contractors use construction-related lighting only where and when necessary for completion of the specific construction activity.</li> <li>• Require construction contractors to ensure that all temporary lighting related to construction activities or security of the Project Site is shielded or directed to confine all direct rays of artificial light within the boundaries of the Project Site, thereby avoiding direct illumination onto light-sensitive properties located outside of the Project Site.</li> <li>• 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 responsible for responding to any local complaints about disturbances related to construction or security lighting.</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>○ Document and respond to each lighting complaint.</li> <li>○ Attempt to contact the person(s) making the lighting complaint as soon as feasible and no later than one construction work day.</li> <li>○ 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.</li> <li>○ 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 measures to address the lighting complaint, to the extent that they can be accomplished, with equipment that is commercially available, and without extending the construction schedule or compromising worker safety.</li> </ul>	<p>Project Applicant            Community Affairs Liaison</p>	<p>ECDD-Building Safety Division</p>	<p>Prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase of the Project, as applicable. On-going during construction.</p> <p>A Community Affairs Liaison shall be designated prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase of the Project, as applicable. Adjacent residences within 500 feet of the Project shall be notified prior to the issuance of any grading or ground-disturbing activity for any phase of the Project</p>	<p>Applicant to report to ECDD-Building Safety Division the name and contact information for the Community Affairs Liaison prior to beginning of construction, subject to review and approval by City</p> <p>Community Affairs Liaison to maintain records of all complaints and corrective action, for review by ECDD-Building Safety Division upon request</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.1 Aesthetics (cont.)</b>					
3.1-2 (cont.)	<p>Examples of measures that may be implemented include but are not limited to:</p> <ul style="list-style-type: none"> <li>○ Confirming construction lighting equipment and related direction and shielding devices are maintained per manufacturer’s specifications;</li> <li>○ Ensuring construction lighting is not operated unnecessarily; and/or</li> <li>○ Evaluating and implementing feasible relocations of lighting equipment, alternatives to specific types of lighting equipment, or changes to direction and shielding equipment, as appropriate.</li> </ul> <p>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.</p>				
	<p><b>Mitigation Measure 3.1-2(b)</b></p> <p><b>Lighting Design Plan.</b> 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.</p> <p>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.</p>	Project Applicant	ECDD-Building Safety Division	<p>A Lighting Design Plan shall be submitted prior to issuance of a building permit for any project element that includes exterior lighting or illuminated signage;</p> <p>The Plan shall be implemented prior to issuance of a certificate of occupancy for any building that includes exterior lighting or illuminated signage</p>	<p>Lighting Design Plan subject to review by ECDD-Building Safety to confirm that lighting standards have been met</p> <p>ECDD-Building Safety to confirm that plan has been carried out prior to issuance of certificate of occupancy</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.1 Aesthetics (cont.)</b>					
3.1-2 (cont.)	<b>Mitigation Measure 3.1-2(c)</b> <b>Hotel Design.</b> 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.	Project Applicant	ECD-Building Safety Division	The hotel design shall be approved prior to issuance of a building permit for above ground construction of the hotel	ECDD-Building Safety Division to confirm that performance standard has been met
<b>3.1-5:</b> 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.	<b>Mitigation Measure 3.1-5</b> Implement Mitigation Measures 3.1-2(a), 3.1-2(b), and 3.1-2(c) (Construction Lighting, Lighting Design Plan, and Hotel Design).	See Mitigation Measures 3.1-2(a), 3.1-2(b), and 3.1-2(c)	See Mitigation Measures 3.1-2(a), 3.1-2(b), and 3.1-2(c)	See Mitigation Measures 3.1-2(a), 3.1-2(b), and 3.1-2(c)	See Mitigation Measures 3.1-2(a), 3.1-2(b), and 3.1-2(c)
<b>3.2 Air Quality</b>					
<b>3.2-1:</b> Construction and operation of the Proposed Project would conflict with implementation of the applicable air quality plan.	<b>Mitigation Measure 3.2-1(a)</b> Implement Mitigation Measure 3.14-2(b) (Implement Transportation Demand Management (TDM) Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<b>Mitigation Measure 3.2-1(b)</b> Implement Mitigation Measure 3.2-2(b) (Emergency Generator and Fire Pump Generator Maintenance & Testing).	See Mitigation Measure 3.2-2(b)	See Mitigation Measure 3.2-2(b)	See Mitigation Measure 3.2-2(b)	See Mitigation Measure 3.2-2(b)
	<b>Mitigation Measure 3.2-1(c)</b> Implement Mitigation Measure 3.2-2(c) (Construction Emissions Minimization Plan).	See Mitigation Measure 3.2-2(c)	See Mitigation Measure 3.2-2(c)	See Mitigation Measure 3.2-2(c)	See Mitigation Measure 3.2-2(c)
	<b>Mitigation Measure 3.2-1(d)</b> Implement Mitigation Measure 3.2-2(d) (Incentives for vendors and material delivery trucks to use ZE or NZE trucks during operation).	See Mitigation Measure 3.2-2(d)	See Mitigation Measure 3.2-2(d)	See Mitigation Measure 3.2-2(d)	See Mitigation Measure 3.2-2(d)
<b>3.2-2:</b> Construction and operation of the Proposed Project would result in a cumulatively considerable net increase in NOx emissions during construction, and a cumulatively considerable net increase in VOC, NOx, CO, PM10, and PM2.5 during operation of the Proposed Project.	<b>Mitigation Measure 3.2-2(a)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.2 Air Quality (cont.)</b>					
3.2-2 (cont.)	<p><b>Mitigation Measure 3.2-2(b)</b>                      Emergency Generator and Fire Pump Generator Maintenance &amp; Testing. The project 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.</p>	Project Applicant	ECDD-Planning Division	Maintenance and/or testing of the emergency generators or fire pump generators shall occur on non-event days	ECDD-Planning Division to establish date for annual reporting by Project Applicant, and to confirm that report has been submitted each year  Annual report may be concurrent with any annual report submitted to the City pursuant to Development Agreement
	<p><b>Mitigation Measure 3.2-2(c)</b>                      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:</p> <ol style="list-style-type: none"> <li>1) The Plan shall set forth in detail how the project applicant will implement Project Design Feature 3.2-1.</li> <li>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 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.</li> </ol>	Project Applicant	ECDD-Building Safety Division	<p>A Construction Emissions Minimization Plan shall be prepared or updated and approved by the City prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase of the Project, as applicable</p> <p>Quarterly reporting and provision of written documentation by contractors demonstrating compliance shall occur during construction</p> <p>A copy of each unit's certified tier specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request during construction</p> <p>Records of all trucks visiting the Project shall be maintained, and such records shall be made available to the City upon request</p>	<ol style="list-style-type: none"> <li>1) Bid documents and compliance records to be maintained by Applicant and available for City inspection upon request</li> <li>2) Bid documents and compliance records to be maintained by Applicant and available for City inspection upon request</li> </ol>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.2 Air Quality (cont.)</b>					
3.2-2 (cont.)	<p>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 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.</p> <p>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.</p> <p>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.</p>			To the extent project construction is phased, requirement shall be met prior to each phase; plan shall be prepared/updated for each phase	<p>3) Contractors maintain records of all trucks visiting the Project; records to be made available to DPW-Building Safety upon request</p> <p>4) Maintain maintenance records for construction phase on site for at least 2 years after completion of construction</p> <p>5) Project Applicant shall retain contracts with construction vendors and contractors; contracts shall be made available to ECDD-Building Safety Division upon request; ECDD-Building Safety Division to confirm that required signage has been posted on construction site</p>
	<p><b>Mitigation Measure 3.2-2(d)</b></p> <p>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.</p>	Project Applicant	ECDD-Planning Division	<p>Incentives (bid preferences) for vendors and material delivery trucks accessing the Project Site during operation shall be reported annually</p> <p>Annual report may be concurrent with any annual report submitted to the City pursuant to Development Agreement</p>	

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.2 Air Quality (cont.)</b>					
3.2-2 (cont.)	<p><b>Mitigation Measure 3.2-2(e)</b>                      If ZE or NZE shuttle buses that are part of a fleet of a transit operator are determined by the City to be available and are sufficient to meet the operational requirements of the TDM Program described in Mitigation Measure 3.14-2(b), the project applicant shall provide bidding priority to encourage their use as part of the TDM Program.</p>	Project Applicant	ECDD-Planning Division	Project Applicant to provide information about the availability of ZE or NZE shuttle buses as part of the fleet of a transit operator capable of meeting operational requirements of the TDM Program during the design and planning of the TDM Program pursuant to Mitigation Measure 3.14.2(b)  City to determine availability prior to operational shuttle bidding process	Project Applicant to maintain records of bids provided and the fleet mix.
<p><b>3.2-5:</b> Construction and operation of the Proposed Project, in conjunction with other cumulative development, would result in inconsistencies with implementation of applicable air quality plans.</p>	<p><b>Mitigation Measure 3.2-5(a)</b>                      Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).</p>	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<p><b>Mitigation Measure 3.2-5(b)</b>                      Implement Mitigation Measure 3.2-2(b) (Emergency Generator and Fire Pump Generator Maintenance &amp; Testing).</p>	See Mitigation Measure 3.2-2(b)	See Mitigation Measure 3.2-2(b)	See Mitigation Measure 3.2-2(b)	See Mitigation Measure 3.2-2(b)
	<p><b>Mitigation Measure 3.2-5(c)</b>                      Implement Mitigation Measure 3.2-2(c) (Construction Emissions Minimization Plan).</p>	See Mitigation Measure 3.2-2(c)	See Mitigation Measure 3.2-2(c)	See Mitigation Measure 3.2-2(c)	See Mitigation Measure 3.2-2(c)
	<p><b>Mitigation Measure 3.2-5(d)</b>                      Implement Mitigation Measure 3.2-2(d) (Incentives for vendors and material delivery trucks to use ZE or NZE trucks during operation).</p>	See Mitigation Measure 3.2-2(d)	See Mitigation Measure 3.2-2(d)	See Mitigation Measure 3.2-2(d)	See Mitigation Measure 3.2-2(d)
<p><b>3.2-6:</b> 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.</p>	<p><b>Mitigation Measure 3.2-6(a)</b>                      Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).</p>	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<p><b>Mitigation Measure 3.2-6(b)</b>                      Implement Mitigation Measure 3.2-2(b) (Emergency Generator and Fire Pump Generator Maintenance &amp; Testing).</p>	See Mitigation Measure 3.2-2(b)	See Mitigation Measure 3.2-2(b)	See Mitigation Measure 3.2-2(b)	See Mitigation Measure 3.2-2(b)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.3 Biological Resources</b>					
3.2-6 (cont.)	<b>Mitigation Measure 3.2-6(c)</b> Implement Mitigation Measure 3.2-2(c) (Prepare and implement a Construction Emissions Minimization Plan).	See Mitigation Measure 3.2-2(c)	See Mitigation Measure 3.2-2(c)	See Mitigation Measure 3.2-2(c)	See Mitigation Measure 3.2-2(c)
	<b>Mitigation Measure 3.2-6(d)</b> Implement Mitigation Measure 3.2-2(d) (Incentivize use of ZE or NZE trucks).	See Mitigation Measure 3.2-2(d)	See Mitigation Measure 3.2-2(d)	See Mitigation Measure 3.2-2(d)	See Mitigation Measure 3.2-2(d)
<b>3.3-2:</b> 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.	<b>Mitigation Measure 3.3-2</b> 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.	Project Applicant	ECDD-Planning Division	Where feasible, tree removal activities should occur September 1 through January 31  Prior to tree removal activities that would occur between February 1 through August 31 in suitable nesting habitat, preconstruction surveys would be conducted by a qualified biologist not more than one week prior to the commencement of construction activities.  If active nests are found during preconstruction surveys, the qualified biologist shall determine an appropriate buffer for avoid the nest and the City shall be notified  Requirement to establish buffer and to consult applies if active nests are found during construction	Measure applies for tree removal activities occurring between February 1 and August 31  Biologist retained by applicant subject to review and approval by City to confirm that biologist is qualified to perform survey. The City shall consult with CDFW in making this determination.  Biologist to prepare report of pre-construction survey, and to submit report to ECDD-Planning Division  Biologist shall immediately notify ECDD-Planning Division if active nests are found, and to identify buffers established as a result; subject to review and approval by ECDD-Planning Division





Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.3 Biological Resources (cont.)</b>					
3.3-3 (cont.)	<p>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.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>				
<b>3.4 Cultural and Tribal Cultural Resources</b>					
<p><b>3.4-1:</b> 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.</p>	<p><b>Mitigation Measure 3.4-1</b></p> <p>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.</p> <p>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 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.</p> <p>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.</p>	Project Applicant	ECDD-Building Safety Division	<p>a) A Monitoring and Mitigation Plan will be prepared and designed prior to the issuance of any permit by the City of Inglewood for ground-disturbing activity for each site or phase of the Project, as applicable</p> <p>The approved Monitoring and Mitigation Plan shall be implemented for the duration of Project construction</p> <p>b) A Cultural Resources Sensitivity Training shall be conducted prior to the start of ground disturbing activities; additional training shall be conducted for new construction personnel during construction, as needed</p>	<p>Qualified archaeologist retained by Project Applicant shall be subject to review/ approval by ECDD-Building Safety Division to confirm designee's qualifications</p> <p>ECDD-Building Safety Division to review Monitoring and Mitigation Plan to confirm that the plan meets the requirements of this mitigation measure</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.4 Cultural and Tribal Cultural Resources (cont.)</b>					
3.4-1 (cont.)	<p>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.</p> <p>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.</p> <p>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).</p>			<p>c) Archaeological and Native American monitors shall be retained prior to issuance of permits for any ground disturbing activity</p> <p>Monitoring shall occur for the duration of ground disturbing activities, as required</p> <p>d) In the event of the discovery of any archaeological materials during construction, work shall immediately cease and the City shall be notified of the discovery</p> <p>Construction shall resume once the qualified archaeologist has made a determination on the significance of the discovered resource(s)</p>	

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.4 Cultural and Tribal Cultural Resources (cont.)</b>					
3.4-1 (cont.)	<p>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.</p> <p>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.</p> <p>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.</p>			<p>e) If historical resources or unique archaeological resources are discovered, avoidance and preservation measures would be implemented</p> <p>f) A Cultural Resources Treatment Plan shall be required during construction if data recovery through excavation is the only feasible mitigation available</p> <p>g) During construction, if the resources are identified as Native American, the qualified archaeologist and project applicant shall consult with appropriate Native American representatives</p>	<p>Preservation in place is considered infeasible if approved geotechnical, grading and/or structural plans, and/or building code requirements, preclude preservation in place</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.4 Cultural and Tribal Cultural Resources (cont.)</b>					
3.4-1 (cont.)	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.			h) A final monitoring and mitigation report shall be submitted within 90 days of completion of excavation and other ground disturbing activities that require monitoring	
<b>3.4-2:</b> 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.	<b>Mitigation Measure 3.4-2</b> Implement Mitigation Measure 3.4-1 (Retention of Qualified Archaeologist).	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1
<b>3.4-3:</b> 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 the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k).	<b>Mitigation Measure 3.4-3</b> Implement Mitigation Measure 3.4-1 (Retention of Qualified Archaeologist).	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.4 Cultural and Tribal Cultural Resources (cont.)</b>					
<p>3.4-3 (cont.)</p> <p>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.</p>					
<p><b>3.4-4:</b> Construction of the Proposed Project could have the potential to disturb human remains including those interred outside of dedicated cemeteries.</p>	<p><b>Mitigation Measure 3.4-4</b></p> <p><b>Inadvertent Discovery of Human Remains.</b> 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.</p>	Project Applicant	ECDD-Building Safety Division	In the event of unanticipated discovery of human remains during excavation or other ground disturbing activities, work shall immediately cease and the City shall be notified	The NAHC shall be notified if it is determined that remains are Native American
<p><b>3.4-5:</b> 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.</p>	<p><b>Mitigation Measure 3.4-5</b></p> <p>Implement Mitigation Measure 3.4-1 (Retention of Qualified Archaeologist).</p>	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.4 Cultural and Tribal Cultural Resources (cont.)</b>					
<b>3.4-6:</b> 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.	<b>Mitigation Measure 3.4-6</b> Implement Mitigation Measure 3.4-1 (Retention of Qualified Archaeologist).	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1
<b>3.4-7:</b> 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.	<b>Mitigation Measure 3.4-7</b> Implement Mitigation Measure 3.4-1 (Retention of Qualified Archaeologist).	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1	See Mitigation Measure 3.4-1
<b>3.4-8:</b> 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.	<b>Mitigation Measure 3.4-8</b> Implement Mitigation Measure 3.4-4 (Cease Work in the Event of Inadvertent Discovery).	See Mitigation Measure 3.4-4	See Mitigation Measure 3.4-4	See Mitigation Measure 3.4-4	See Mitigation Measure 3.4-4
<b>3.6 Geology and Soils</b>					
<b>3.6-1:</b> Construction and operation of the Proposed Project could have the potential to result in the substantial erosion or the loss of topsoil.	<b>Mitigation Measure 3.6-1</b> Implement Mitigation Measure 3.9-1(a) (Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB).	See Mitigation Measure 3.9-1(a)	See Mitigation Measure 3.9-1(a)	See Mitigation Measure 3.9-1(a)	See Mitigation Measure 3.9-1(a)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.6 Geology and Soils (cont.)</b>					
<p><b>3.6-2:</b> Construction of the Proposed Project could have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p>	<p><b>Mitigation Measure 3.6-2</b>                      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:</p> <p>a) Prepare, design, and implement a monitoring and mitigation plan for the Project consistent with Society of Vertebrate Paleontology Guidelines. The program 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.</p> <p>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.</p> <p>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.</p>	<p>Project Applicant</p>	<p>ECDD-Building Safety Division</p>	<p>a) A monitoring and mitigation plan shall be prepared and designed prior to issuance of any permits for ground-disturbing activity by the City of Inglewood for each site or phase of the Project, as applicable                       The monitoring and mitigation shall be implemented for the duration of Project construction</p> <p>b) Paleontological resources sensitivity training shall be conducted prior to the start of ground disturbing activities; additional training shall be conducted for new construction personnel during construction, as needed</p> <p>c) Paleontological resources monitoring shall be conducted during grading, pursuant to the monitoring and mitigation program and as directed by qualified paleontologist                       Qualified paleontologist shall maintain daily logs on an on-going basis for the duration of ground disturbing activities</p>	<p>ECDD-Building Safety Division to review and approve designated paleontologist to confirm that designee has appropriate qualifications                       a) MMP to be submitted and approved by ECDD-Building Safety Division to confirm that requirements of Mitigation Measure 3.6-2(a) have been met construction</p> <p>b) Paleontologist to retain documentation that construction personnel have attended training; documentation to be made available to ECDD-Building Safety Division upon request</p>



Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.6 Geology and Soils (cont.)</b>					
3.6-2 (cont.)	<p>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.</p> <p>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.</p>			<p>Should construction activities be ceased, the City shall be notified</p> <p>d) If fossils are encountered during ground disturbing activities, their significance shall be determined and, if required, delivered to an accredited repository</p> <p>e) A final monitoring and mitigation report shall be submitted within 90 days of completion of excavation and other ground disturbing activities</p>	<p>e) Final monitoring report submitted to the City within 90 days of completion of excavation and ground-disturbing activities</p>
<p><b>3.6-3:</b> 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.</p>	<p><b>Mitigation Measure 3.6-3</b> Implement Mitigation Measure 3.9-1(a). (Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB).</p>	See Mitigation Measure 3.9-1(a)	See Mitigation Measure 3.9-1(a)	See Mitigation Measure 3.9-1(a)	See Mitigation Measure 3.9-1(a)
<p><b>3.6-4:</b> Construction of the Proposed Project, in conjunction with other cumulative development, could have the potential to contribute to cumulative impacts on paleontological resources.</p>	<p><b>Mitigation Measure 3.6-4</b> Implement Mitigation Measure 3.6-2.</p>	See Mitigation Measure 3.9-2	See Mitigation Measure 3.9-2	See Mitigation Measure 3.9-2	See Mitigation Measure 3.9-2

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions</b>					
<p><b>3.7-1:</b> 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.</p>	<p><b>Mitigation Measure 3.7-1(a)</b>  <b>GHG Reduction Plan.</b> 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.</p> <p>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.</p> <p>The GHG Reduction Plan shall include the following elements:</p> <ol style="list-style-type: none"> <li>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 (see subd. (2)), 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>2</sub>e)/year.</li> </ol>	Project Applicant	ECDD-Planning Division TDM Program and related monitoring to be submitted to DPW-Transportation & Traffic Division	<p>1) Components of the GHG Reduction Plan relevant to construction activities being permitted shall be submitted to and approved by the City prior to issuance of a permit for such activities</p> <p>Components of the GHG Reduction Plan relevant to operations, including GHG emissions reduction measures and an estimate of the Project's net new GHG emissions over a 30-year operational life of the Project, shall be submitted to and approved by the City prior to issuance of certificate of occupancy for the Arena</p>	<p>ECDD-Planning Division to review qualifications of person preparing GHG Reduction Plan to confirm that designee has requisite expertise</p> <p>DPW-Transportation &amp; Traffic Division to establish date when Project Applicant is to submit annual TDM Program monitoring report; annual report may be concurrent with any annual report submitted to the City pursuant to Development Agreement</p> <p>Where mitigation measure requires Project Applicant to provide reports to OPR, Project Applicant to provide confirmation to DPW-Transportation &amp; Traffic Division</p> <p>See Mitigation Measure 3.14-2(b)</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<p>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.</p> <p>A. Required GHG Reduction Measures.</p> <p>a. Minimize energy demand, including electricity and natural gas demand through implementation of LEED Gold certification design features.</p> <p>b. Implement a transportation demand management (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:</p> <p>i. TDM 1 – Encourage Alternative Modes of Transportation (Rail, Public Bus, and Vanpool).</p> <p>The IBEC Project shall encourage alternative modes of transportation use by providing monetary incentives and bus stop improvements near the Project Site, which shall include:</p> <ul style="list-style-type: none"> <li>• Integrated event and transit ticketing to enable seamless connections and provide event-day travel updates.</li> <li>• Discounted event tickets with the purchase of a transit pass or providing proof of a registered TAP card (the regional fare payment method).</li> <li>• Giveaways for transit users (goods for attendees, free tickets for employees, etc.).</li> </ul>	Project Applicant	DPW-Transportation & Traffic Division	<p>The TDM Program shall be finalized by 6 months prior to the issuance of certificate of occupancy for the Arena; subject to review and approval by DPW-Transportation &amp; Traffic Division</p> <p>The TDM Program and GHG Reduction Plan shall be implemented throughout operations</p>	<p>Project Applicant shall commence design and planning for TDM Program in coordination with DPW-Transportation &amp; Traffic Division not less than 24 months prior to Arena completion date (currently estimated July 2024)</p> <p>Initial planning to include creation of a schedule for development of the TDM Program to ensure finalization by 6 months prior to the issuance of certificate of occupancy for the Arena</p> <p>Revisions to TDM Program subject to review and approval of DPW-Transportation &amp; Traffic Division</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<ul style="list-style-type: none"> <li>• Rewards/gamification opportunities for fans to compete for prizes or points based on their transportation choices.</li> <li>• 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.</li> <li>• Transit and/or Multi-Modal Subsidy: the IBEC Project shall provide pre-tax commuter benefits for employees.</li> <li>• Vanpool Subsidy: This shall provide pre-tax commuter benefits for employees.</li> <li>• Marketing and outreach campaign to event attendees and employees for transit usage.</li> </ul> <p>ii. TDM 2 – Event-day Dedicated Shuttle Services</p> <p>The following shall be provided to ensure sufficient connectivity to existing and planned 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:</p> <ul style="list-style-type: none"> <li>• 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 Downtown Inglewood Station for Arena events. This shuttle service shall be a dedicated event-day shuttle service from the venue for employees and attendees.</li> <li>• The IBEC 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 and after the attendees, respectively, the same shuttles would be utilized for the employees. It is anticipated that the shuttle service would begin two hours before the major event and extend to 30 minutes after the start. After the major event, shuttle service would begin 30 minutes before the end, and continues one hour after.</li> </ul>				<p>Shuttle routes (TDM 2) subject to review and approval by DPW-Transportation &amp; Traffic Division</p> <p>Project Applicant to maintain documentation of implementation of TDM Program, and to make documentation available to DPW-Transportation &amp; Traffic Division upon request</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<ul style="list-style-type: none"> <li>• The IBEC Project shall implement Mitigation Measure 3.14-2(b), 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.</li> <li>• 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 3.14-3(f), which requires constructing a dedicated northbound right-turn lane that would extend from the bus pull-out on the east side of South Prairie Avenue to West Century Boulevard.</li> </ul> <p>iii. TDM 3 – Encourage Carpools and Zero-Emission Vehicles</p> <p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Variable parking price based on car occupancy - structured to encourage carpooling.</li> </ul>				

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<ul style="list-style-type: none"> <li>• 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).</li> </ul> <p>iv. TDM 4 – Encourage Active Transportation</p> <p>The IBEC Project shall include features that would enhance the access for bicyclists and pedestrians, including the following:</p> <ul style="list-style-type: none"> <li>• Bicycle parking: Provide bicycle parking in excess of applicable code requirements as follows: 60 employee bike parking spaces and 23 attendee bike parking spaces.</li> <li>• Provide showers and lockers for employees.</li> <li>• A bike valet service would be implemented if needed to accommodate bike parking space needs.</li> <li>• A bicycle repair station where bicycle maintenance tools and supplies are readily available on a permanent basis and offered in good condition.</li> <li>• Coordinate bike pools and walk pools.</li> </ul> <p>Sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities and throughout the development.</p> <p>v. TDM 5 – Employee Vanpool Program</p> <p>The IBEC Project shall provide an employee vanpool program to 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.</p>				

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<p>vi. TDM 6 – Park-n-Ride Program                      The IBEC 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 shall correspond to zip code ticket purchase data, and the site circulation shall 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.</p> <p>vii. TDM 7 – Information Services                      The IBEC Project shall provide services to inform the public about activities at the IBEC, including the following:</p> <ul style="list-style-type: none"> <li>• Strategic Multi-modal Signage/Wayfinding</li> <li>• Real-time travel information; Changeable Message Sign (CMS) and social media</li> <li>• Welcome packets for new employees and ongoing marketing</li> <li>• Commercials/Advertisement - Television, Website, Social Media, Radio, etc.</li> <li>• Information kiosk or bulletin board providing information about public transportation options.</li> </ul> <p>viii. TDM 8 – Reduce On-Site Parking Demand                      The IBEC Project shall include features that reduce on-site parking demand. These features shall include:</p> <ul style="list-style-type: none"> <li>• 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 is 10 persons per vehicle and 45 person per bus for the charter coach bus.</li> <li>• Allocate sufficient TNC staging spaces: the IBEC Project shall be designed to accommodate approximately 160 spaces for TNC staging.</li> </ul>				

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<p>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 on all event days.</p> <p>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.</p>			<p>The project applicant shall prepare and submit an annual TDM Program monitoring report to DPW-Transportation &amp; Traffic Division</p> <p>The initial TDM Program monitoring report shall be submitted not more than 60 days after the anniversary of the date on which Arena events commence</p> <p>After initial year of operations, City may adjust date of submittal of the annual TDM Program monitoring report to be concurrent with any annual report submitted to the City pursuant to Development Agreement</p> <p>Project Applicant and DPW-Transportation &amp; Traffic Division to meet not less than once per year to review report, discuss TDM Program operations, and to modify program as necessary</p>	



Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<p>c. A monitoring report shall be prepared not less than once each year. The report shall evaluate whether the TDM Program is achieving the reduction in vehicle trips set forth above. The monitoring report shall be provided to the City Traffic Engineer (ongoing) and OPR (through 2030) and made available to LADOT.</p> <p>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 reducing single-occupancy vehicle trips and increasing the use of other modes of transportation besides automobile to travel to basketball games and other events hosted at the Project.</p> <p>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.</p> <p>B. Potential Additional GHG Reduction Measures</p> <p>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:</p> <p>a. Potential on-site measures:</p> <ol style="list-style-type: none"> <li>i. Installation of additional photovoltaic systems as carports on the Eastern Parking Garage.</li> <li>ii. Purchase of energy for on-site consumption through the Southern California Edison (SCE) Green Rate, which facilitates SCE's purchase of renewable energy 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.</li> <li>iii. If available after approval by applicable regulatory agencies, on-site use of renewable natural gas.</li> <li>iv. Implementation of a waste diversion program with a goal of reducing landfill waste to zero.</li> </ol>				

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<p>b. Potential off-site measures:</p> <p>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, verifiable, real, and enforceable. The methodology for ensuring that each of the six "environmental integrity standards" listed in the immediately preceding sentence shall be that all carbon offset credits used to meet the requirements of this paragraph have been implemented, independently verified, and enforced in accordance with the objective criteria detailed in any one or more of the following Protocols, Methodologies, and/or Standards ("Protocols" are promulgated by the Climate Action Reserve ("CAR") while the American Carbon Registry ("ACR") and Verra ("VCS") use the terms "Standards" and "Methodologies"):</p> <p>(1) U.S. Forestry (CAR Version 5.0; ACR Version 6.0 and Methodologies authorized thereby), (2) Urban Tree Planting (CAR Version 2.0), (3) Livestock Digesters (CAR Version 4.0), (4) Ozone Depleting Substances (CAR version 2.0), (5) Mine Methane Capture (CAR Version 1.1), (6) Rice Cultivation (CAR Version 1.1), (7) U.S. Landfill (CAR Version 5.0; VCS Version 4 and Methodologies authorized thereby), (8) Grasslands (CAR Version 2.1; ACR Version 6.0 and Methodologies authorized thereby), and (9) Green Energy (ACR Version 6.0 and VCS Version 4, and Methodologies authorized thereby). Without limiting the generality of the foregoing, in the event that an approved registry becomes no longer approved by CARB and the offset credits cannot be transferred to another approved registry, the project applicant shall comply with the rules and procedures for retiring and/or replacing offset credits in the manner specified by the applicable Protocol, Standard or Methodology, including (to the extent required) by purchasing an equivalent number of credits to recoup the loss. In order to account for changing technologies and improved methodologies during the operational life of the project, the project applicant may utilize updated versions of the Protocols, Standards, or Methodologies promulgated from time to time by an approved registry if</p>				

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<p>the project applicant provides written documentation to the City as a component of its Annual GHG Verification Report (a copy of which is provided to CARB), demonstrating that the updated version is at least as effective as the versions expressly enumerated above; additionally, the project applicant may utilize carbon offset credits generated by a project approved under an earlier version of an applicable Protocol, Standard, or Methodology to the extent authorized by the later version of the applicable Protocol, Standard, or Methodology. Carbon offset credits generated by a project located outside the United States or its territories shall not be used to satisfy this measure.</p> <ul style="list-style-type: none"> <li>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).</li> <li>iii. Local EV Charging Stations. The project applicant may enter into agreements to install EVCS locations in the City for use by the public.</li> <li>iv. The project applicant may develop or enter into partnership with other organizations to develop a tree planting program in the City.</li> <li>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.</li> </ul> <p>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.</p>				

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.7 Greenhouse Gas Emissions (cont.)</b>					
3.7-1 (cont.)	<p><b>Mitigation Measure 3.7-1(b)</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>In reviewing the GHG Reduction Plan, any revisions to that plan, or other reports related to implementation of the Plan, the City shall select and consult with a qualified expert greenhouse gas emissions verifier accredited by the ANSI National Accreditation Board (ANAB) Accreditation Program for Greenhouse Gas Validation/Verification Bodies or a Greenhouse Gas Emissions Lead Verifier accredited by CARB, or an expert with equivalent qualifications to the extent necessary to assist with this review. Any expenses incurred by the City in retaining this expert shall be borne by the project applicant.</p> <p>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.</p>	Project Applicant	ECDD-Planning Division	<p>An Annual GHG Verification Report shall be prepared annually during operation and submitted to the City in the first quarter of every year of Project operation or concurrent with any annual report submitted to the City pursuant to Development Agreement</p> <p>Any revisions to the GHG Reduction Plan, if needed, shall be submitted to the City within three months after verification of the Annual Verification Report</p>	<p>Project Operator shall submit Annual GHG Verification Report to ECDD-Planning Division year after project operations commence or concurrent with any annual report submitted to the City pursuant to Development Agreement; copy to be provided to CARB</p> <p>Report to be prepared by qualified expert retained by applicant; report preparer subject to review and approval by ECDD-Planning Division to conform that designee has requisite expertise</p> <p>City may retain expert to review GHG Reduction Plan, or implementation of plan, at its discretion, at Project Applicant's expense</p> <p>Timing of submittal of annual report may be concurrent with any annual report submitted to the City pursuant to Development Agreement</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.8 Hazards and Hazardous Materials</b>					
<p><b>3.8-4:</b> 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.</p>	<p><b>Mitigation Measure 3.8-4</b></p> <p>Prior to initiating any ground disturbing activities on the Project Site, the project applicant shall prepare a Soil Management Plan (SMP) that is submitted to and reviewed and approved by the 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.</p> <p>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 DTSC, LARWQCB, SMU, and/or other 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.</p> <p>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 DTSC, LARWQCB, SMU, and/or other applicable regulatory agency, and in accordance with the SMP to ensure that suspect soils are isolated, protected from runoff, and disposed of in accordance with transport laws and the requirements of the licensed receiving facility.</p> <p>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 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.</p>	<p>Project Applicant and designated REA</p>	<p>ECDD-Building Safety</p>	<p>A Soil Management Plan shall be prepared and submitted prior to issuance of any permits by the City of Inglewood for ground disturbing activities for each site or phase of the Project, as applicable</p> <p>Implementation of the Soil Management Plan shall be on-going for the duration of construction</p> <p>If unidentified or suspected contaminated soils or groundwater is encountered, any further ground disturbing activities shall be conducted according to a site-specific health and safety plan and the City shall be notified of this contamination</p> <p>If contaminated soils or groundwater is encountered, ground disturbing activities shall not recommence until remediation is completed and a "no further action" letter is obtained or direction is otherwise given from the appropriate regulatory agency that construction can recommence</p>	<p>Applicant-retained REA prepares SMP and submits to appropriate regulatory agency</p> <p>ECDD-Building Safety to review REA to confirm that designee has requisite qualifications and expertise to prepare REA</p> <p>ECDD-Building Safety to confirm that Project Applicant has submitted SMP, and that appropriate regulatory agency has approved it</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.8 Hazards and Hazardous Materials (cont.)</b>					
<p><b>3.8-5:</b> 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.</p>	<p><b>Mitigation Measure 3.8-5</b></p> <p>The project applicant shall submit an application to the Airport Land Use Commission (ALUC) for a determination that 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.</p> <p>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.</p>	Project Applicant	ECDD-Planning Division/ALUC/FAA	An application for a determination of consistency with the Airport Land Use Plan shall be submitted to ALUC and Form 7460-1 shall be submitted to the FAA, and the determinations of ALUC and the FAA shall be provided to the City prior to the issuance of any building permits for above-ground structures by the City of Inglewood for any site or phase of the Project	Copies of ALUP consistency determination issued by ALUC and Determination of No Hazard issued by FAA shall be provide to ECDD-Planning Division
<b>3.9 Hydrology and Water Quality</b>					
<p><b>3.9-1:</b> 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.</p>	<p><b>Mitigation Measure 3.9-1(a)</b></p> <p>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.</p>	Project Applicant	ECDD-Planning Division/DPW-Environmental Services Division/Los Angeles RWQCB	A LID Report and SWPPP shall be prepared and approved by the City and Los Angeles RWQCB prior to issuance of any construction permit	ECDD-Planning Division to confirm that reports have been submitted to and approved by Los Angeles RWQCB
	<p><b>Mitigation Measure 3.9-1(b)</b></p> <p>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.</p>	Project Applicant	DPW-Environmental Services Division	Sweeping of parking lots shall occur weekly during operation, as needed  Logs of dates and times sweeping occurred shall be maintained and submitted to the City on a quarterly basis during operation	Project Applicant shall make logs available to DPW-Environmental Services Division upon request

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.9 Hydrology and Water Quality (cont.)</b>					
<p><b>3.9-3:</b> 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.</p>	<p><b>Mitigation Measure 3.9-3</b> 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).</p>	<p>See Mitigation Measures 3.9-1(a) and 3.9-1(b)</p>	<p>See Mitigation Measures 3.9-1(a) and 3.9-1(b)</p>	<p>See Mitigation Measures 3.9-1(a) and 3.9-1(b)</p>	<p>See Mitigation Measures 3.9-1(a) and 3.9-1(b)</p>
<p><b>3.9-4:</b> 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.</p>	<p><b>Mitigation Measure 3.9-4</b> 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).</p>	<p>See Mitigation Measures 3.9-1(a) and 3.9-1(b)</p>	<p>See Mitigation Measures 3.9-1(a) and 3.9-1(b)</p>	<p>See Mitigation Measures 3.9-1(a) and 3.9-1(b)</p>	<p>See Mitigation Measures 3.9-1(a) and 3.9-1(b)</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.9 Hydrology and Water Quality (cont.)</b>					
<p><b>3.9-6:</b> 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.</p>	<p><b>Mitigation Measure 3.9-6</b> 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).</p>	See Mitigation Measures 3.9-1(a) and 3.9-1(b)	See Mitigation Measures 3.9-1(a) and 3.9-1(b)	See Mitigation Measures 3.9-1(a) and 3.9-1(b)	See Mitigation Measures 3.9-1(a) and 3.9-1(b)
<b>3.11 Noise and Vibration</b>					
<p><b>3.11-1:</b> 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.</p>	<p><b>Mitigation Measure 3.11-1</b> 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 relative to the 5 dBA over ambient significance threshold. 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, to the extent that they can be accomplished, with equipment that is commercially available, and without extending the construction schedule or compromising worker safety:</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	Project Applicant' Community Affairs Liaison	ECDD-Building Safety Division	<p>A Construction Noise Reduction Plan shall be prepared or updated and approved prior to the issuance of any permits for construction activities by the City of Inglewood for each site or phase of the Project, as applicable.</p> <p>The approved Construction Noise Reduction Plan shall be implemented for the duration of Project construction</p>	Acoustical consultant retained by Project Applicant subject to review and approval by ECDD-Building Safety Division to confirm that designee has requisite expertise.



Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.11 Noise and Vibration (cont.)</b>					
3.11-1 (cont.)	<ul style="list-style-type: none"> <li>• Buffer distances and types of equipment selected to minimize noise impacts.</li> <li>• Haul routes subject to preapproval by the City.</li> <li>• 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.</li> <li>• 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 required by the Contractor, an exhaust muffler on the compressed air exhaust and external jackets shall be used to lower noise levels. Quieter procedures shall be used, such as drills rather than impact equipment.</li> <li>• Stationary noise sources (e.g., generators) shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures. Pole power shall be utilized in lieu of generators at the earliest possible point in time. 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.</li> <li>• Use of "quiet" pile driving technology (such as auger displacement installation), in consideration of geotechnical and structural requirements and conditions.</li> </ul>				<p>Pile driving technology will be determined in light of recommendations of the geotechnical report.</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.11 Noise and Vibration (cont.)</b>					
3.11-1 (cont.)	<ul style="list-style-type: none"> <li>• 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 responsible for responding to any local complaints about construction activities associated with the Proposed Project.</li> <li>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:               <ul style="list-style-type: none"> <li>○ Document and respond to each noise complaint.</li> <li>○ Attempt to contact the person(s) making the noise complaint as soon as feasible and no later than one construction day.</li> <li>○ 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.</li> <li>○ 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 measures within the Project Site to address the noise complaint, to the extent that such measures can be accomplished, with equipment that is commercially available, and without extending the construction schedule or compromising worker safety.</li> </ul> </li> <li>Examples of measures that may be implemented within the Project Site include, but are not limited to:               <ul style="list-style-type: none"> <li>○ Confirming construction equipment and related noise suppression devices are maintained per manufacturers' specifications;</li> <li>○ Ensuring construction equipment is not idled for extended periods of time; and/or</li> <li>○ Evaluating relocations of equipment, alternatives to specific types of equipment, or resequencing of construction activities, as appropriate, while maintaining the project schedule and safety.</li> </ul> </li> <li>• 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.</li> </ul>			<p>A Community Affairs Liaison shall be designated prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase of the Project, as applicable</p>	<p>Applicant to report to ECDD-Building Safety Division the name and contact information for the Community Affairs Liaison prior to beginning of construction, subject to review and approval by City</p> <p>Community Affairs Liaison to maintain records of all complaints and corrective action, for review by ECDD-Building Safety Division upon request</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.11 Noise and Vibration (cont.)</b>					
<p><b>3.11-2:</b> 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.</p>	<p><b>Mitigation Measure 3.11-2(a)</b>                      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 relative to the 3 dBA over ambient significance threshold. The level of noise reduction to be achieved by the Operations Noise Reduction Plan shall be documented by a qualified noise consultant and submitted to the City. The Operations Noise Reduction Plan shall be submitted to and approved by the City prior to the issuance of the first Plaza building permit and verified prior to the issuance of the Certificate of Occupancy for the first Plaza Building, and revised on an as-needed basis to address noise-related design details added thereafter.</p> <p>The Operations Noise Reduction Plan shall include the following:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Locate, 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.</li> <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> <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:                         <ul style="list-style-type: none"> <li>○ 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>○ 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> </li> </ul>	Project Applicant	ECDD-Planning Division	A Noise Reduction Plan shall be prepared and approved prior to the issuance of the first building permit for a Plaza building and verified prior to the issuance of the first certificate of occupancy for a Plaza building The approved Noise Reduction Plan shall be implemented for the duration of Project operation	Acoustical consultant retained by Project Applicant subject to review and approval by ECDD-Building Safety Division to confirm that designee has requisite expertise ECDD-Building Safety Division to confirm that Noise Reduction Plan includes appropriate noise reduction strategies

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.11 Noise and Vibration</b>					
3.11-2 (cont.)	<b>Mitigation Measure 3.11-2(b)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
<b>3.11-3:</b> Construction of the Proposed Project would generate excessive groundborne vibration levels.	<b>Mitigation Measure 3.11-3(a)</b> 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.	Project Applicant	ECDD-Building Safety Division	A Compliance Monitor shall be designated prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase of the Project, as applicable  A distance of more than 20 feet between operating construction equipment and neighboring structures shall be maintained for the duration of construction  A log documenting the distance of operating construction equipment during construction shall be maintained and submitted on a quarterly basis  On-going during construction	Compliance Monitor to make records available to ECDD-Building Safety Division upon request re: use of construction equipment that generates high levels of vibration.  Because of proximity of neighboring structures to the property lines, there are some instances in which project construction with equipment that generates high levels of vibration may be necessary within 20 feet of a neighboring structure in order to meet geotechnical, grading, or structural requirements while maintaining the construction schedule and worker safety.

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.11 Noise and Vibration (cont.)</b>					
3.11-3 (cont.)	<p><b>Mitigation Measure 3.11-3(b)</b></p> <p>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:</p> <p>a) Pre-Demolition and Construction:</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv. A line and grade pre-construction survey at the affected buildings shall be conducted.</li> </ol> <p>b) During Demolition and Construction:</p> <ol style="list-style-type: none"> <li>i. The construction contractor shall regularly inspect and photograph crack gauges, maintaining records of these inspections to be included in post-construction reporting. Gauges shall be inspected every two weeks, or more frequently during periods of active project actions in close proximity to crack monitors.</li> </ol>	Applicant Designated Compliance Monitor	City of Inglewood Building Official/ ECDD-Building Safety Division	<p>A Compliance Monitor shall be designated prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase of the Project, as applicable</p> <p>a) A vibration, crack, and line and grade monitoring program shall be developed based on requirements provided in a)i through a)iv prior to the issuance of the first demolition, grading, or construction permit for any phase of the Project</p> <p>b)(i) The construction contractor shall regularly inspect and photograph crack gauges two weeks during construction, or more frequently, as necessary</p>	<p>a) Upon request, Compliance Monitor to provide City of Inglewood Building Official with documentation of current conditions including photos and pre-construction survey</p> <p>b)(i) Construction contractor shall maintain records of biweekly crack gauge inspections</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.11 Noise and Vibration (cont.)</b>					
3.11-3 (cont.)	<ul style="list-style-type: none"> <li>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.</li> <li>c) Post-Construction                             <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul> </li> </ul>			<p>b)(ii) The construction contractor shall collect vibration data on a monthly basis during construction</p> <p>c)(i) A report documenting crack and vibration monitoring shall be provided to the City prior to the issuance of certificate of occupancy for each building</p> <p>c)(ii) Repairs to damaged buildings shall occur on an on-going basis during construction, as necessary</p>	<p>b)(ii) Construction contractor shall report vibration levels to City of Inglewood Building Official on a monthly basis</p> <p>c)(i) Construction contractor to submit crack and vibration monitoring report to City of Inglewood Building Official</p>
	<p><b>Mitigation Measure 3.11-3(c)</b>                      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.</p>	Project Applicant Community Affairs Liaison	ECDD-Building Safety Division	A Community Affairs Liaison shall be designated prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase of the Project, as applicable	Applicant to report to ECDD-Building Safety Division the name and contact information for the Community Affairs Liaison prior to beginning of construction, subject to review and approval by City

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.11 Noise and Vibration (cont.)</b>					
3.11-3 (cont.)	<p>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:</p> <ul style="list-style-type: none"> <li>• Document and respond to each vibration complaint.</li> <li>• Attempt to contact the person(s) making the vibration complaint as soon as feasible and no later than one construction work day.</li> <li>• Conduct a prompt investigation to attempt to determine if construction activities contribute a substantial amount of the vibration related to the complaint.</li> <li>• 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 measures to address the vibration complaint, to the extent that such measures can be accomplished, with equipment that is commercially available, and without extending the construction schedule or compromising worker safety.</li> </ul> <p>Examples of measures that may be implemented include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Confirming construction equipment is maintained per manufacturer's specifications;</li> <li>• Ensuring construction equipment is not operated unnecessarily; and/or</li> <li>• Evaluating and implementing any 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.</li> </ul>				Community Affairs Liaison to maintain records of all complaints and corrective action, for review by ECDD-Building Safety Division upon request
<p><b>3.11-5:</b> Construction of the Proposed Project, in conjunction with other cumulative development, would result in cumulative temporary increases in ambient noise levels.</p>	<p><b>Mitigation Measure 3.11-5</b> Implement Mitigation Measure 3.11-1 (Construction Noise Reduction Plan).</p>	See Mitigation Measure 3.11-1	See Mitigation Measure 3.11-1	See Mitigation Measure 3.11-1	See Mitigation Measure 3.11-1

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation</b>					
<b>3.11-6:</b> Operation of the Proposed Project, in conjunction with other cumulative development, would result in cumulative permanent increases in ambient noise levels.	<b>Mitigation Measure 3.11-6(a)</b> Implement Mitigation Measure 3.11-2(a) (Noise Reduction Plan).	See Mitigation Measure 3.11-2(a)	See Mitigation Measure 3.11-2(a)	See Mitigation Measure 3.11-2(a)	See Mitigation Measure 3.11-2(a)
	<b>Mitigation Measure 3.11-6(b)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
<b>3.11-7:</b> Construction of the Proposed Project, in conjunction with other cumulative development, would generate excessive groundborne vibration.	<b>Mitigation Measure 3.11-7</b> 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).	See Mitigation Measures 3.11-3(a), 3.11-3(b), and 3.11-3(c)	See Mitigation Measures 3.11-3(a), 3.11-3(b), and 3.11-3(c)	See Mitigation Measures 3.11-3(a), 3.11-3(b), and 3.11-3(c)	See Mitigation Measures 3.11-3(a), 3.11-3(b), and 3.11-3(c)
<b>3.14-1:</b> Operation of the Proposed Project ancillary land uses would cause significant impacts at intersections under Adjusted Baseline conditions.	<b>Mitigation Measure 3.14-1(a)</b> 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, which shall include: <ul style="list-style-type: none"><li>• 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.</li><li>• Transit and/or Multi-Modal Subsidy: The Project would provide pre-tax commuter benefits for employees.</li><li>• Vanpool Subsidy: This would provide pre-tax commuter benefits for employees.</li><li>• Marketing and outreach campaign for transit usage.</li></ul>	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)



Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-1 (cont.)	<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p>c) TDM 4/Encourage Active Transportation – The Project shall include features which enhance access for bicyclists and pedestrians including the following:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Provide showers and lockers for employees.</li> <li>• 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.</li> <li>• Sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities and throughout the development.</li> </ul> <p>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.</p> <p>e) TDM 7/Information Services – The Project shall provide services to inform employees about transportation options including the following:</p> <ul style="list-style-type: none"> <li>• Welcome packets for new employees and ongoing marketing.</li> <li>• Information kiosk or bulletin board providing information about public transportation options.</li> </ul>				
	<p><b>Mitigation Measure 3.14-1(b)</b> Implement Mitigation Measure 3.14-3(f) (South Prairie Avenue/West Century Boulevard Improvements).</p>	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)
	<p><b>Mitigation Measure 3.14-1(c)</b> Implement Mitigation Measure 3.14-3(l) (South Prairie Avenue/West 104th Street Improvements).</p>	See Mitigation Measure 3.14-3(l)	See Mitigation Measure 3.14-3(l)	See Mitigation Measure 3.14-3(l)	See Mitigation Measure 3.14-3(l)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
<p><b>3.14-2:</b> Daytime events at the Proposed Project Arena would cause significant impacts at intersections under Adjusted Baseline conditions.</p>	<p><b>Mitigation Measure 3.14-2(a)</b></p> <p>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:</p> <p>a) <u>Vehicle Queuing on City Streets:</u> 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):</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Southbound South Prairie Avenue: vehicle queues do not spill back from the project vicinity to beyond Manchester Boulevard.</li> <li>• 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.</li> <li>• Westbound West Century Boulevard: vehicle queues do not spill back from the project vicinity to beyond Crenshaw Boulevard.</li> </ul> <p>b) <u>Pedestrian Flows:</u> 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.</p> <p>c) <u>Vehicular Parking:</u> A comprehensive parking plan is implemented that could include strategies such as a reservation system 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.</p> <p>d) <u>Bicycle Parking:</u> 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.</p> <p>e) <u>Shuttle Bus Loading:</u> An adequate amount of curbside 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.</p>	Project Applicant	DPW-Transportation & Traffic Division	<p>The Event TMP shall be finalized by 6 months prior to the issuance of certificate of occupancy for the Arena; subject to review and approval by DPW-Transportation &amp; Traffic Division</p> <p>The approved Event TMP shall be implemented throughout Project operation</p> <p>The project applicant shall prepare and submit an annual monitoring report to DPW-Transportation &amp; Traffic Division not more than 60 days after the final basketball game at the arena for that year; after initial year of operations, City may adjust date of submittal of annual report to be concurrent with any annual report submitted to the City pursuant to Development Agreement</p>	<p>Project Applicant shall commence design and planning for Event TMP in coordination with DPW-Transportation &amp; Traffic Division not less than 24 months prior to the anticipated completion date for the Arena (currently estimated July 2024)</p> <p>Initial planning to include creation of a schedule for development of the Event TMP to ensure finalization by 6 months prior to the issuance of certificate of occupancy for the Arena</p> <p>Event TMP to address parking garage and lot operations at garages or lots to be used for the event, including (as appropriate) Project garages and lots, City lots, Hollywood Park lots, parking lots at The Forum, or lots owned by local businesses; to the extent Project Applicant does not control lots or garages, efforts to coordinate with facility owners shall be documented</p> <p>Project Applicant to coordinate with DPW-Transportation &amp; Traffic Division re: item (i) (Neighborhood Protection and Streets) to ensure that TMP is</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p>f) <u>Shuttle Bus Capacity and Wait Times</u>: 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.</p> <p>g) <u>Paratransit</u>: Specific suitable locations are provided to accommodate paratransit vehicle stops.</p> <p>h) <u>Ridehailing</u>: 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.</p> <p>i) <u>Neighborhood Protection and Streets</u>: Reduce traffic volumes on local and collector street segments identified in the Final 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.</p> <p>j) <u>Truck Staging</u>: 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.</p> <p>k) <u>Parking Garage/Lot Operations</u>: 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.</p> <p>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.</p>				<p>consistent with, and reflects, programs being implemented by City and within City's jurisdiction</p> <p>Revisions to Event TMP subject to review and approval of DPW-Transportation &amp; Traffic Division</p> <p>Shuttle routes (Event TMP (f)) subject to review and approval by DPW-Transportation &amp; Traffic Division</p> <p>Project Applicant to maintain documentation of implementation of Event TMP, and to make documentation available to DPW-Transportation &amp; Traffic Division upon request</p> <p>Event TMP to include coordination of traffic signals and optimization of traffic signal timing for major event traffic flows (See Mitigation Measure 3.14-3(o))</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p>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, and achieving the identified standards for each of these issues.</p>				
	<p><b>Mitigation Measure 3.14-2(b)</b></p> <p>The project applicant shall implement a Transportation Demand Management Program (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:</p> <p>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, which shall include:</p> <ul style="list-style-type: none"> <li>• Integrated event and transit ticketing to enable seamless connections and provide event-day travel updates.</li> <li>• Discounted event tickets with the purchase of a transit pass or providing proof of a registered TAP card (the regional fare payment method).</li> <li>• Giveaways for transit users (goods for attendees, free tickets for employees, etc.).</li> <li>• Rewards/gamification opportunities for fans to compete for prizes or points based on their transportation choices.</li> <li>• 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.</li> <li>• Transit and/or Multi-Modal Subsidy: The Project shall provide pre-tax commuter benefits for employees.</li> <li>• Vanpool Subsidy: This shall provide pre-tax commuter benefits for employees.</li> <li>• Marketing and outreach campaign for transit usage.</li> </ul>	Project Applicant	DPW-Transportation & Traffic Division	<p>The TDM Program shall be finalized by 6 months prior to the issuance of certificate of occupancy for the Arena; subject to review and approval by DPW-Transportation &amp; Traffic Division</p> <p>The TDM Program shall be implemented throughout operations</p>	<p>Project Applicant shall commence design and planning for TDM Program in coordination with DPW-Transportation &amp; Traffic Division not less than 24 months prior to the anticipated completion date for the Arena (currently estimated July 2024)</p> <p>Initial planning to include creation of a schedule for development of the TDM Program to ensure finalization by 6 months prior to the issuance of certificate of occupancy for the Arena</p> <p>Revisions to TDM Program subject to review and approval of DPW-Transportation &amp; Traffic Division</p> <p>Shuttle routes (TDM 2) subject to review and approval by DPW-Transportation &amp; Traffic Division</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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 major event and extend to 30 minutes after the start. After the major event, shuttle service would begin 30 minutes before the end, and continue one hour after.</li> <li>• 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. Final location and length of drop-off area subject to review/approval by DPW-Transportation &amp; Traffic Division.</li> <li>• 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.</li> </ul>				Project Applicant to maintain documentation of implementation of TDM Program, and to make documentation available to DPW-Transportation & Traffic Division upon request

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p>c) TDM 3/Encourage Carpools and Zero-Emission Vehicles – The 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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Provide variable parking price based on car occupancy – structured to encourage carpooling.</li> <li>• The Project would provide 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).</li> </ul> <p>d) TDM 4/Encourage Active Transportation – The Project shall include features which enhance access for bicyclists and pedestrians including the following:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Provide showers and lockers for employees.</li> <li>• A bike valet service would be implemented if needed to accommodate bike parking space needs.</li> <li>• 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.</li> <li>• Coordinate bike pools and walk pools.</li> <li>• Sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities and throughout the development.</li> </ul> <p>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.</p>				

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p>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.</p> <p>g) TDM 7/Information– The Project shall provide information services to inform the public about activities at the Project including the following:</p> <ul style="list-style-type: none"> <li>• Strategic multi-modal signage/wayfinding.</li> <li>• Real-time travel information; changeable message sign (CMS) and social media.</li> <li>• Welcome packets for new employees and ongoing marketing.</li> <li>• Commercials/advertisement – television, website, social media, radio, etc.</li> <li>• Information kiosk or bulletin board providing information about public transportation options.</li> </ul> <p>h) TDM 8/Reduce On-Site Parking Demand – The Project shall include features that reduce on-site parking demand. These features shall include:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Allocated sufficient TNC staging spaces: The Project is designed to accommodate approximately 160 spaces for TNC staging.</li> </ul> <p>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 shall have a capacity of no less than 10 persons per vehicle and shall provide service to employees and event attendees on all event days.</p>				

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p>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.</p> <p>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 OPR (through 2030) and made available to LADOT.</p> <p>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 reducing single-occupancy vehicle trips and increasing the use of other modes of transportation besides automobile to travel to basketball games and other events hosted at the Project.</p>			<p>The project applicant shall prepare and submit an annual TDM Program monitoring report to DPW-Transportation &amp; Traffic Division</p> <p>Initial TDM Program monitoring report shall be submitted not more than 60 days after the anniversary of the date on which Arena events commence</p> <p>After initial year of operations, City may adjust date of submittal of annual TDM Program monitoring report to be concurrent with any annual report submitted to the City pursuant to the City Development Agreement</p> <p>Project applicant and DPW-Transportation &amp; Traffic Division to meet not less than once per year to review report, discuss TDM Program operations, and to modify program as necessary</p>	<p>Measure requires Project Applicant to provide annual report to OPR through 2030; Project Applicant to provide copy to DPW-Transportation &amp; Traffic Division to confirm that report has been provided as required by measure</p>



Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p><b>Mitigation Measure 3.14-2(c)</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>b) Remove median island on the west leg and restripe the eastbound and westbound approaches to add second left-turn lanes in each direction.</li> </ul> <p>Should these improvements be deemed infeasible as a result of further engineering review by LADOT, 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.</p>	Project Applicant, in consultation with LADOT	DPW-Transportation & Traffic Division	Prior to issuance of a Certificate of Occupancy, Applicant shall work with the City of Inglewood and LADOT to determine that improvements are feasible and acceptable to LADOT, and if feasible and acceptable, such improvements shall be completed or adequate security for the completion of such improvements for the estimated amount to complete such improvements provided to the City of Inglewood in a form acceptable to the City	<p>Improvement subject to review and approval by both City of Inglewood and LADOT for planning, design and implementation of improvement</p> <p>DPW-Transportation &amp; Traffic Division to coordinate with LADOT</p> <p>Regarding determining the equivalent effectiveness of a substitute measure, please see Draft EIR page 3.14-201.</p>
	<p><b>Mitigation Measure 3.14-2(d)</b></p> <p>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.</p>	Project Applicant	DPW-Transportation & Traffic Division	<p>Intersection improvements shall be implemented prior to issuance of certificate of occupancy for the Arena</p> <p>DPW-Transportation &amp; Traffic Division to approve planning and design prior to constructing improvement</p>	
	<p><b>Mitigation Measure 3.14-2(e)</b></p> <p>Implement Mitigation Measure 3.14-3(f) (South Prairie Avenue/West Century Boulevard Improvements)</p>	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p><b>Mitigation Measure 3.14-2(f)</b></p> <p>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.</p>	Project Applicant	DPW-Transportation & Traffic Division	<p>Intersection improvements shall be implemented prior to issuance of certificate of occupancy for the Arena</p> <p>DPW-Transportation &amp; Traffic Division to approve planning and design prior to constructing improvement</p>	
	<p><b>Mitigation Measure 3.14-2(g)</b></p> <p>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.</p>	Project Applicant in consultation with Caltrans	DPW-Transportation & Traffic Division	<p>Prior to issuance of a Certificate of Occupancy, Applicant shall work with the City of Inglewood and Caltrans to determine that offramp improvements are feasible and acceptable to Caltrans, and if feasible and acceptable, such improvements shall be completed or adequate security for the completion of such improvements for the estimated amount to complete such improvements provided to the City of Inglewood in a form acceptable to the City</p>	DPW-Transportation & Traffic Division to coordinate with Caltrans

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p><b>Mitigation Measure 3.14-2(h)</b>                      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.</p>	Project Applicant	DPW-Transportation & Traffic Division	Intersection improvements shall be implemented prior to issuance of certificate of occupancy for the Arena  DPW-Transportation & Traffic Division to approve planning and design prior to constructing improvement	
	<p><b>Mitigation Measure 3.14-2(i)</b>                      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.</p>	Project Applicant	DPW-Transportation & Traffic Division	Intersection improvements to be implemented prior to issuance of certificate of occupancy for the Arena  DPW-Transportation & Traffic Division to approve planning and design prior to constructing improvement	
	<p><b>Mitigation Measure 3.14-2(j)</b>                      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.</p>	Project Applicant in consultation with Caltrans and the City of Hawthorne	DPW-Transportation & Traffic Division	Prior to issuance of a Certificate of Occupancy, Applicant shall work with the City of Inglewood, Caltrans, and the City of Hawthorne to determine that offramp improvements are feasible and acceptable to Caltrans and the City of Hawthorne, and if feasible and acceptable, such improvements shall be completed or adequate security for the completion of such improvements for the estimated amount to complete such improvements provided	DPW-Transportation & Traffic Division to coordinate with Caltrans and City of Hawthorne

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)				to the City of Inglewood in a form acceptable to the City	
	<p><b>Mitigation Measure 3.14-2(k)</b>                      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.</p>	Project Applicant in consultation with City of Hawthorne	DPW-Transportation & Traffic Division	Prior to issuance of a Certificate of Occupancy, Applicant shall work with the City of Inglewood and the City of Hawthorne to determine that intersection improvements are feasible and acceptable to the City of Hawthorne, and if feasible and acceptable, such improvements shall be completed or adequate security for the completion of such improvements for the estimated amount to complete such improvements provided to the City of Inglewood in a form acceptable to the City	DPW-Transportation & Traffic Division to coordinate with City of Hawthorne
	<p><b>Mitigation Measure 3.14-2(l)</b>                      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.</p>	Project Applicant in consultation with City of Hawthorne	DPW-Transportation & Traffic Division	Prior to issuance of a Certificate of Occupancy, Applicant shall work with the City of Inglewood and the City of Hawthorne to determine that intersection improvements are feasible and acceptable to the City of Hawthorne, and if feasible and acceptable, such improvements shall be completed or adequate	DPW-Transportation & Traffic Division to coordinate with City of Hawthorne

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)				security for the completion of such improvements for the estimated amount to complete such improvements provided to the City of Inglewood in a form acceptable to the City	
	<p><b>Mitigation Measure 3.14-2(m)</b>                      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).</p>	Project Applicant	DPW-Transportation & Traffic Division	<p>An Event TMP shall be developed and approved prior to issuance of certificate of occupancy for the Arena; subject to review and approval by DPW-Transportation &amp; Traffic Division</p> <p>The approved Event TMP shall be implemented throughout Project operation</p> <p>Annual monitoring report to be submitted to DPW-Transportation &amp; Traffic Division not more than 60 days after the final basketball game at the arena for that year; after initial year of operations, City may adjust date of submittal of annual report to be concurrent with any annual report submitted to the City pursuant to Development Agreement</p>	<p>See Mitigation Measure 3.14-2(a)</p> <p>TCOs to be deployed as set forth in Event TMP</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-2 (cont.)	<p><b>Mitigation Measure 3.14-2(n)</b>                      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.</p>	Project Applicant	DPW-Transportation & Traffic Division	Intersection improvements shall be implemented prior to issuance of certificate of occupancy for the Arena  DPW-Transportation & Traffic Division to approve planning and design prior to constructing improvements	
	<p><b>Mitigation Measure 3.14-2(o)</b>                      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.</p>	DPW-Transportation & Traffic Division to implement; Project Applicant to provide necessary resources	DPW-Transportation & Traffic Division	Funding contribution to the City of Inglewood shall be made 30 months prior to the anticipated completion date for the Arena (currently estimated July 2024)	
	<p><b>Mitigation Measure 3.14-2(p)</b>                      The project applicant shall work with the City of Inglewood, the City of Hawthorne, and Caltrans to investigate the feasibility of adding a second eastbound left-turn lane or extending the length of the single existing left-turn lane on 120th Street at the I-105 Eastbound On/Off Ramps within the existing pavement width and, if determined to be feasible within the existing pavement width, to implement the improvement.</p>	Project Applicant in consultation with Caltrans and the City of Hawthorne	DPW-Transportation & Traffic Division	Prior to issuance of a Certificate of Occupancy, Applicant shall work with the City of Inglewood, Caltrans, and the City of Hawthorne to determine that improvements are feasible and acceptable to Caltrans and the City of Hawthorne, and if feasible and acceptable, such improvements shall be completed or adequate security for the completion of such improvements for the estimated amount to complete such improvements provided to the City of Inglewood in a form acceptable to the City	DPW-Transportation & Traffic Division to coordinate with Caltrans and City of Hawthorne

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
<p><b>3.14-3:</b> Major events at the Proposed Project Arena would cause significant impacts at intersections under Adjusted Baseline conditions.</p>	<p><b>Mitigation Measure 3.14-3(a)</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).</p>	<p>See Mitigation Measure 3.14-2(a)</p>	<p>See Mitigation Measure 3.14-2(a)</p>	<p>See Mitigation Measure 3.14-2(a)</p>	<p>See Mitigation Measure 3.14-2(a)</p>
	<p><b>Mitigation Measure 3.14-3(b)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).</p>	<p>See Mitigation Measure 3.14-2(b)</p>	<p>See Mitigation Measure 3.14-2(b)</p>	<p>See Mitigation Measure 3.14-2(b)</p>	<p>See Mitigation Measure 3.14-2(b)</p>
	<p><b>Mitigation Measure 3.14-3(c)</b> 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.</p>	<p>Project Applicant in consultation with Caltrans</p>	<p>DPW-Transportation &amp; Traffic Division</p>	<p>Prior to issuance of a Certificate of Occupancy, Applicant shall work with the City of Inglewood and Caltrans to determine that offramp improvements are feasible and acceptable to Caltrans, and if feasible and acceptable, such improvements shall be completed or adequate security for the completion of such improvements for the estimated amount to complete such improvements provided to the City of Inglewood in a form acceptable to the City</p>	<p>DPW-Transportation &amp; Traffic Division to coordinate with Caltrans</p>
	<p><b>Mitigation Measure 3.14-3(d)</b> Implement Mitigation Measure 3.14-2(d) (West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard Improvements).</p>	<p>See Mitigation Measure 3.14-2(d)</p>	<p>See Mitigation Measure 3.14-2(d)</p>	<p>See Mitigation Measure 3.14-2(d)</p>	<p>See Mitigation Measure 3.14-2(d)</p>
	<p><b>Mitigation Measure 3.14-3(e)</b> 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.</p>	<p>Project Applicant</p>	<p>DPW-Transportation &amp; Traffic Division</p>	<p>Signal control system to be upgraded prior to issuance of certificate of occupancy for the Arena  DPW-Transportation &amp; Traffic Division to approve planning and design prior to constructing improvement</p>	<p>Signals to meet applicable Code requirements</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-3 (cont.)	<p><b>Mitigation Measure 3.14-3(f)</b>            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.</p>	Project Applicant	DPW-Transportation & Traffic Division	Intersection improvements shall be implemented prior to issuance of certificate of occupancy to issuance of certificate of occupancy for the Arena DPW-Transportation & Traffic Division to approve planning and design prior to constructing improvement TCOs shall be provided as indicated on ongoing basis during operations as required by Event TMP	Project Applicant to provide all equipment needed to operate shuttle bus pull-out effectively, without interfering with pedestrians Signals to meet applicable Code requirements DPW-Transportation & Traffic Division to monitor operations and require changes as necessary to ensure safe operations TCOs to be deployed as set forth in Event TMP
	<p><b>Mitigation Measure 3.14-3(g)</b>            Implement Mitigation Measure 3.14-2(g) (I-105 Off-Ramp Widening at South Prairie Avenue).</p>	See Mitigation Measure 3.14-2(g)	See Mitigation Measure 3.14-2(g)	See Mitigation Measure 3.14-2(g)	See Mitigation Measure 3.14-2(g)
	<p><b>Mitigation Measure 3.14-3(h)</b>            Implement Mitigation Measure 3.14-2(j) (I-105 Westbound Off-Ramp Widening at Crenshaw Boulevard).</p>	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)
	<p><b>Mitigation Measure 3.14-3(i)</b>            Implement Mitigation Measure 3.14-2(l) (Crenshaw Boulevard/120th Street Improvements).</p>	See Mitigation Measure 3.14-2(l)	See Mitigation Measure 3.14-2(l)	See Mitigation Measure 3.14-2(l)	See Mitigation Measure 3.14-2(l)



Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-3 (cont.)	<p><b>Mitigation Measure 3.14-3(j)</b>                      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 as a result of further engineering review by LADOT, 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.</p>	Project Applicant in consultation with LADOT	DPW-Transportation & Traffic Division	Prior to issuance of a Certificate of Occupancy, Applicant shall work with the City of Inglewood and LADOT to determine that improvements are feasible and acceptable to LADOT, and if feasible and acceptable, such improvements shall be completed or adequate security for the completion of such improvements for the estimated amount to complete such improvements provided to the City of Inglewood in a form acceptable to the City	DPW-Transportation & Traffic Division to coordinate with LADOT  Regarding determining the equivalent effectiveness of a substitute measure, please see Draft EIR page 3.14-218.
	<p><b>Mitigation Measure 3.14-3(k)</b>                      Implement Mitigation Measure 3.14-2(n) (La Brea Avenue/Centinela Avenue Improvements).</p>	See Mitigation Measure 3.14-2(n)	See Mitigation Measure 3.14-2(n)	See Mitigation Measure 3.14-2(n)	See Mitigation Measure 3.14-2(n)
	<p><b>Mitigation Measure 3.14-3(l)</b>                      The project applicant shall implement protected or protected/permissive left-turn phasing on northbound and southbound South Prairie Avenue at West 104th Street.</p>	Project Applicant	DPW-Transportation & Traffic Division	Intersection improvements shall be implemented prior to issuance of certificate of occupancy for the Arena  DPW-Transportation & Traffic Division to approve planning and design prior to constructing improvement	
	<p><b>Mitigation Measure 3.14-3(m)</b>                      Implement Mitigation Measure 3.14-2(e) (West 104th Street/Yukon Avenue Improvements).</p>	See Mitigation Measure 3.14-2(e)	See Mitigation Measure 3.14-2(e)	See Mitigation Measure 3.14-2(e)	See Mitigation Measure 3.14-2(e)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-3 (cont.)	<b>Mitigation Measure 3.14-3(n)</b> Implement Mitigation Measure 3.14-2(j) (Manchester Boulevard/ Crenshaw Boulevard Improvements).	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)
	<b>Mitigation Measure 3.14-3(o)</b> 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).	Project Applicant and DPW- Transportation & Traffic Division	DPW- Transportation & Traffic Division	Traffic signal improvements shall be implemented prior to issuance of certificate of occupancy for the Arena	Signals to meet applicable Code requirements
	<b>Mitigation Measure 3.14-3(p)</b> Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS program).	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)
	<b>Mitigation Measure 3.14-3(q)</b> Implement Mitigation Measure 3.14-2(p) (If Feasible, Add Second Eastbound Left-Turn Lane or Extend Existing Lane on 120th Street at the I-105 Eastbound On/Off Ramps)	See Mitigation Measure 3.14-2(p)	See Mitigation Measure 3.14-2(p)	See Mitigation Measure 3.14-2(p)	See Mitigation Measure 3.14-2(p)
	<b>Mitigation Measure 3.14-3(r)</b> Implement Mitigation Measure 3.14-2(q) (Funding Contribution to LADOT for ITS)	See Mitigation Measure 3.14-2(q)	See Mitigation Measure 3.14-2(q)	See Mitigation Measure 3.14-2(q)	See Mitigation Measure 3.14-2(q)
<b>3.14-4:</b> Operation of the Proposed Project ancillary land uses would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.	<b>Mitigation Measure 3.14-4(a)</b> Implement Neighborhood Traffic Management Plan component of Event TMP, which is contained in Mitigation Measure 3.14-2(a) (Implement Event TMP).	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)
	<b>Mitigation Measure 3.14-4(b)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
<b>3.14-5:</b> Daytime events at the Proposed Project Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.	<b>Mitigation Measure 3.14-5</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)
<b>3.14-6:</b> Major events at the Proposed Project Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.	<b>Mitigation Measure 3.14-6</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
<b>3.14-8:</b> Daytime events at the Proposed Project Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions.	<b>Mitigation Measure 3.14-8(a)</b> Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b) (Implement TDM Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<b>Mitigation Measure 3.14-8(b)</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.	Project Applicant in consultation with Caltrans	DPW-Transportation & Traffic Division	Payment to Caltrans shall occur prior to issuance first building permit for the Arena, following excavation	DPW-Transportation & Traffic Division to coordinate with Caltrans
<b>3.14-9:</b> Major events at the Proposed Project Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions.	<b>Mitigation Measure 3.14-9(a)</b> Implement Mitigation Measure 3.14-3(h) ((I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)
	<b>Mitigation Measure 3.14-9(b)</b> Implement Mitigation Measure 3.14-3(c) (Restripe I-405 NB Off-Ramp at West Century Boulevard).	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)
	<b>Mitigation Measure 3.14-9(c)</b> Implement Mitigation Measure 3.14-3(o) (Coordinate and Optimize Traffic Signals on Inglewood Streets).	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)
	<b>Mitigation Measure 3.14-9(d)</b> Implement Mitigation Measure 3.14-3(g) (I-105 Off-ramp Widening at South Prairie Avenue).	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)
	<b>Mitigation Measure 3.14-9(e)</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)
	<b>Mitigation Measure 3.14-9(f)</b> Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b) (Implement TDM Program).	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-9 (cont.)	<b>Mitigation Measure 3.14-9(g)</b> Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).	See Mitigation Measure 3.14-8(a)	See Mitigation Measure 3.14-8(a)	See Mitigation Measure 3.14-8(a)	See Mitigation Measure 3.14-8(a)
<b>3.14-10:</b> Certain components of the Proposed Project would generate VMT in excess of applicable thresholds.	<b>Mitigation Measure 3.14-10(a)</b> Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b) (Implement TDM Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<b>Mitigation Measure 3.14-10(b)</b> The project applicant shall operate a shuttle to transport hotel guests between the hotel and Los Angeles International Airport.	Project Applicant	DPW-Transportation & Traffic Division	Shuttles shall operate during hotel operation Logs of dates that shuttles were operated shall be maintained and submitted to the City on an annual basis during operation	Project applicant may assign shuttle operations to the hotel operator
<b>3.14-11:</b> Operation of the Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under Adjusted Baseline conditions.	<b>Mitigation Measure 3.14-11(a)</b> Implement Mitigation Measures 3.14-2(a) (Implement Event TMP), 3.14-2(b) (Implement TDM Program), and the entirety of intersection improvements identified in Mitigation Measures 3.14-2 and 3.14-3.	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3
	<b>Mitigation Measure 3.14-11(b)</b> Implement Mitigation Measure 3.14-3(f) (South Prairie Avenue/West Century Boulevard Improvements). As part of those improvements, extend the proposed shuttle bus pull-out on the east side of South Prairie Avenue to the South Prairie Avenue/West Century Boulevard intersection.	See Mitigation Measure 3.14-3(f)  Project Applicant	See Mitigation Measure 3.14-3(f)  DPW-Transportation & Traffic Division	See Mitigation Measure 3.14-3(f)  Intersection improvements shall be implemented prior to issuance of certificate of occupancy to issuance of certificate of occupancy for the Arena  DPW-Transportation & Traffic Division to approve planning and design prior to constructing improvement	

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
<p><b>3.14-13:</b> The Proposed Project could have the potential to adversely affect existing or planned pedestrian facilities or fail to adequately provide for access by pedestrians.</p>	<p><b>Mitigation Measure 3.14-13</b> The project applicant shall widen the east leg crosswalk across West Century Boulevard at South Prairie Avenue to 20 feet.</p>	Project Applicant	DPW-Transportation & Traffic Division	<p>Crosswalk improvements shall be implemented prior to issuance of certificate of occupancy for the Arena</p> <p>DPW-Transportation &amp; Traffic Division to approve planning and design prior to constructing improvement, including any upgrades needed to comply with Code or ADA requirements</p>	
<p><b>3.14-14:</b> The Proposed Project could have the potential to result in inadequate emergency access under Adjusted Baseline conditions.</p>	<p><b>Mitigation Measure 3.14-14</b> 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 shall include, but may not be limited to, the following:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>c) Provide direction to TCOs regarding best practices for accommodating emergency vehicles present in congested conditions during pre-event and post-event conditions.</li> </ul>	Project Applicant	DPW-Transportation & Traffic Division	<p>The Local Hospital Access Plan (LHAP) shall be developed in coordination with DPW-Transportation &amp; Traffic Division, the Inglewood Police Department, and Los Angeles County Fire Department</p> <p>The LHAP shall be approved by the DPW Transportation &amp; Traffic Division prior to the issuance of a certificate of occupancy for the Arena, and shall be implemented throughout Arena operations</p> <p>The Project Applicant shall schedule and coordinate quarterly meetings with CHMC after</p>	<p>The LHAP shall be revised as necessary to ensure that access to CHMC is maintained</p> <p>LHAP to be integrated into City's ITS, as necessary</p> <p>Reasonable access is achieved if an unimpeded travel route is available along designated alternative routes to CHMC identified in the Local Hospital Access Plan</p>

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-14 (cont.)	<p>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.</p> <p>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.</p>			<p>Arena operations commence. Attendees to include DPW-Transportation &amp; Traffic Division, City of Inglewood Police Department, CHMC, and/or Los Angeles County Fire Department, as appropriate</p>	
<p><b>3.14-15:</b> The Proposed Project would substantially affect circulation for a substantial duration of construction under Adjusted Baseline conditions.</p>	<p><b>Mitigation Measure 3.14-15</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>a) Identification of haul routes and truck circulation patterns; not permitting trucks to travel on residential streets.</li> <li>b) Time of day of arrival and departure of trucks.</li> <li>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.</li> <li>d) Preparation of worksite traffic control plan(s) for lane and/or sidewalk closures.</li> <li>e) Identification of detour routes and signing plan for street/lane closures.</li> <li>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).</li> <li>g) Maintain safe and efficient access routes for emergency vehicles and transit.*</li> <li>h) Manual traffic control when necessary.</li> <li>i) Provisions for pedestrian and bicycle safety.</li> <li>j) Identification of locations for construction worker parking; not permitting construction worker parking on residential streets.</li> <li>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.</li> </ul>	Project Applicant	DPW-Transportation & Traffic Division	<p>A draft of the Construction Traffic Management Plan shall be submitted to DPW-Transportation &amp; Traffic Division 6 months before construction commences. The plan shall be revised as necessary to address comments and shall be approved or updated prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase of the Project, as applicable</p> <p>Plan to be submitted to local emergency response agencies and transit providers 60 days before construction commences</p> <p>Local emergency response agencies and transit providers shall be notified 30 days prior to the commencement of construction activities that would partially or fully obstruct roadways</p>	Project Applicant to provide to DPW-Transportation & Traffic Division written confirmation that plan has provided plan to local emergency response agencies and transit providers

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-15 (cont.)	<p>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.</p> <p>A copy of the construction traffic management plan shall be submitted to local emergency response agencies and transit providers, and these agencies shall be notified at least 30 days before the commencement of construction that would partially or fully obstruct roadways.</p> <p>(Footnote *: 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.)</p>			The Plan shall be implemented prior to start of construction activities for each site or phase of the Project, as applicable	
<b>3.14-16:</b> Operation of the Proposed Project ancillary land uses would cause significant impacts at intersections under cumulative conditions.	<p><b>Mitigation Measure 3.14-16(a)</b> Implement Mitigation Measure 3.14-1(a) (Elements of the TDM Program for daytime and non-event employees).</p>	See Mitigation Measure 3.14-1(a)	See Mitigation Measure 3.14-1(a)	See Mitigation Measure 3.14-1(a)	See Mitigation Measure 3.14-1(a)
	<p><b>Mitigation Measure 3.14-16(b)</b> Implement Mitigation Measure 3.14-3(f) (South Prairie Avenue/West Century Boulevard Improvements).</p>	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)
	<p><b>Mitigation Measure 3.14-16(c)</b> Implement Mitigation Measure 3.14-2(g) (I-105 Off-Ramp Widening at South Prairie Avenue).</p>	See Mitigation Measure 3.14-2(g)	See Mitigation Measure 3.14-2(g)	See Mitigation Measure 3.14-2(g)	See Mitigation Measure 3.14-2(g)
<b>3.14-17:</b> Daytime events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions.	<p><b>Mitigation Measure 3.14-17a</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).</p>	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)
	<p><b>Mitigation Measure 3.14-17(b)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).</p>	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<p><b>Mitigation Measure 3.14-17(c)</b> Implement Mitigation Measure 3.14-2(c) (West Century Boulevard/La Cienega Boulevard Improvements).</p>	See Mitigation Measure 3.14-2(c)	See Mitigation Measure 3.14-2(c)	See Mitigation Measure 3.14-2(c)	See Mitigation Measure 3.14-2(c)
	<p><b>Mitigation Measure 3.14-17(d)</b> Implement Mitigation Measure 3.14-2(d) (West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard Improvements).</p>	See Mitigation Measure 3.14-2(d)	See Mitigation Measure 3.14-2(d)	See Mitigation Measure 3.14-2(d)	See Mitigation Measure 3.14-2(d)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-17 (cont.)	<b>Mitigation Measure 3.14-17(e)</b> Implement Mitigation Measure 3.14-3(f) (South Prairie Avenue/West Century Boulevard Improvements).	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)
	<b>Mitigation Measure 3.14-17(f)</b> Implement Mitigation Measure 3.14-2(f) (West 104th Street/Yukon Avenue Improvements).	See Mitigation Measure 3.14-2(f)	See Mitigation Measure 3.14-2(f)	See Mitigation Measure 3.14-2(f)	See Mitigation Measure 3.14-2(f)
	<b>Mitigation Measure 3.14-17(g)</b> Implement Mitigation Measure 3.14-2(g) (I-105 Off-ramp Widening at South Prairie Avenue).	See Mitigation Measure 3.14-2(g)	See Mitigation Measure 3.14-2(g)	See Mitigation Measure 3.14-2(g)	See Mitigation Measure 3.14-2(g)
	<b>Mitigation Measure 3.14-17(h)</b> Implement Mitigation Measure 3.14-2(h) (Manchester Boulevard/La Brea Avenue Improvements).	See Mitigation Measure 3.14-2(h)	See Mitigation Measure 3.14-2(h)	See Mitigation Measure 3.14-2(h)	See Mitigation Measure 3.14-2(h)
	<b>Mitigation Measure 3.14-17(i)</b> Implement Mitigation Measure 3.14-2(i) (Manchester Boulevard/Crenshaw Boulevard Avenue Improvements).	See Mitigation Measure 3.14-2(i)	See Mitigation Measure 3.14-2(i)	See Mitigation Measure 3.14-2(i)	See Mitigation Measure 3.14-2(i)
	<b>Mitigation Measure 3.14-17(j)</b> Implement Mitigation Measure 3.14-2(j) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)
	<b>Mitigation Measure 3.14-17(k)</b> Implement Mitigation Measure 3.14-2(k) (South Prairie Avenue/120th Street Improvements).	See Mitigation Measure 3.14-2(k)	See Mitigation Measure 3.14-2(k)	See Mitigation Measure 3.14-2(k)	See Mitigation Measure 3.14-2(k)
	<b>Mitigation Measure 3.14-17(l)</b> Implement Mitigation Measure 3.14-2(l) (Crenshaw Boulevard/120th Street Improvements).	See Mitigation Measure 3.14-2(l)	See Mitigation Measure 3.14-2(l)	See Mitigation Measure 3.14-2(l)	See Mitigation Measure 3.14-2(l)
	<b>Mitigation Measure 3.14-17(m)</b> Implement Mitigation Measure 3.14-2(m) (Provide TCOs on Crenshaw Boulevard at 120th Street during post-event period as part of Event TMP).	See Mitigation Measure 3.14-2(m)	See Mitigation Measure 3.14-2(m)	See Mitigation Measure 3.14-2(m)	See Mitigation Measure 3.14-2(m)
	<b>Mitigation Measure 3.14-17(n)</b> Implement Mitigation Measure 3.14-2(n) (La Brea Avenue/Centinel Avenue Improvements).	See Mitigation Measure 3.14-2(n)	See Mitigation Measure 3.14-2(n)	See Mitigation Measure 3.14-2(n)	See Mitigation Measure 3.14-2(n)
	<b>Mitigation Measure 3.14-17(o)</b> Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS Program).	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)



Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-17 (cont.)	<b>Mitigation Measure 3.14-17(p)</b> Implement Mitigation Measure 3.14-3(c) (I-405 NB Off-Ramp Restripe at West Century Boulevard).	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)
	<b>Mitigation Measure 3.14-17(q)</b> 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.	Project Applicant	DPW-Transportation & Traffic Division	Intersection improvements shall be implemented prior to issuance of certificate of occupancy for the Arena  DPW-Transportation & Traffic Division to approve planning and design prior to constructing improvement	
<b>3.14-18:</b> Major events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions.	<b>Mitigation Measure 3.14-18(a)</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)
	<b>Mitigation Measure 3.14-18(b)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<b>Mitigation Measure 3.14-18(c)</b> Implement Mitigation Measure 3.14-3(c) (I-405 NB Off-Ramp Restripe at West Century Boulevard).	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)
	<b>Mitigation Measure 3.14-18(d)</b> Implement Mitigation Measure 3.14-2(d) (West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard Improvements).	See Mitigation Measure 3.14-2(d)	See Mitigation Measure 3.14-2(d)	See Mitigation Measure 3.14-2(d)	See Mitigation Measure 3.14-2(d)
	<b>Mitigation Measure 3.14-18(e)</b> Implement Mitigation Measure 3.14-3(e) (Protected or protected/permissive eastbound/westbound left turns at South Prairie Avenue/Pincay Drive).	See Mitigation Measure 3.14-3(e)	See Mitigation Measure 3.14-3(e)	See Mitigation Measure 3.14-3(e)	See Mitigation Measure 3.14-3(e)
	<b>Mitigation Measure 3.14-18(f)</b> Implement Mitigation Measure 3.14-3(f) (South Prairie Avenue/West Century Boulevard Improvements).	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)	See Mitigation Measure 3.14-3(f)
	<b>Mitigation Measure 3.14-18(g)</b> Implement Mitigation Measure 3.14-2(g) (I-105 Off-Ramp Widening at South Prairie Avenue).	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-18 (cont.)	<b>Mitigation Measure 3.14-18(h)</b> Implement Mitigation Measure 3.14-2(j) (I-105 Off-ramp Widening at Crenshaw Boulevard).	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)	See Mitigation Measure 3.14-2(j)
	<b>Mitigation Measure 3.14-18(i)</b> Implement Mitigation Measure 3.14-2(l) (Crenshaw Boulevard/120th Street Improvements).	See Mitigation Measure 3.14-2(l)	See Mitigation Measure 3.14-2(l)	See Mitigation Measure 3.14-2(l)	See Mitigation Measure 3.14-2(l)
	<b>Mitigation Measure 3.14-18(j)</b> Implement Mitigation Measure 3.14-3(j) (La Cienega Boulevard/Centinel Avenue Improvements).	See Mitigation Measure 3.14-3(j)	See Mitigation Measure 3.14-3(j)	See Mitigation Measure 3.14-3(j)	See Mitigation Measure 3.14-3(j)
	<b>Mitigation Measure 3.14-18(k)</b> Implement Mitigation Measure 3.14-2(n) (La Brea Avenue/Centinel Avenue Improvements).	See Mitigation Measure 3.14-2(n)	See Mitigation Measure 3.14-2(n)	See Mitigation Measure 3.14-2(n)	See Mitigation Measure 3.14-2(n)
	<b>Mitigation Measure 3.14-18(l)</b> Implement Mitigation Measure 3.14-3(l) (South Prairie Avenue/West 104th Street Improvements).	See Mitigation Measure 3.14-3(l)	See Mitigation Measure 3.14-3(l)	See Mitigation Measure 3.14-3(l)	See Mitigation Measure 3.14-3(l)
	<b>Mitigation Measure 3.14-18(m)</b> Implement Mitigation Measure 3.14-2(e) (West 104th Street/Yukon Avenue Improvements).	See Mitigation Measure 3.14-2(e)	See Mitigation Measure 3.14-2(e)	See Mitigation Measure 3.14-2(e)	See Mitigation Measure 3.14-2(e)
	<b>Mitigation Measure 3.14-18(n)</b> Implement Mitigation Measure 3.14-2(i) (Manchester Boulevard/Crenshaw Boulevard Improvements).	See Mitigation Measure 3.14-2(i)	See Mitigation Measure 3.14-2(i)	See Mitigation Measure 3.14-2(i)	See Mitigation Measure 3.14-2(i)
	<b>Mitigation Measure 3.14-18(o)</b> Implement Mitigation Measure 3.14-3(o) (Coordinate and Optimize Traffic Signals on Inglewood Streets).	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)
	<b>Mitigation Measure 3.14-18(p)</b> Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS program).	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)
	<b>Mitigation Measure 3.14-18(q)</b> Implement Mitigation Measure 3.14-17(q) (Felton Avenue/West Century Boulevard Improvements).	See Mitigation Measure 3.14-17(q)	See Mitigation Measure 3.14-17(q)	See Mitigation Measure 3.14-17(q)	See Mitigation Measure 3.14-17(q)
	<b>Mitigation Measure 3.14-18(r)</b> Implement Mitigation Measure 3.14-2(h) (Manchester Boulevard/La Brea Avenue Improvements).	See Mitigation Measure 3.14-2(h)	See Mitigation Measure 3.14-2(h)	See Mitigation Measure 3.14-2(h)	See Mitigation Measure 3.14-2(h)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-18 (cont.)	<p><b>Mitigation Measure 3.14-18(s)</b></p> <p>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.</p> <ul style="list-style-type: none"> <li>• Concourse Way / West Century Boulevard</li> <li>• Western Avenue / West Century Boulevard</li> <li>• Vermont Avenue / West Century Boulevard</li> <li>• Van Ness Avenue / Manchester Boulevard</li> <li>• Western Avenue / Manchester Boulevard</li> <li>• Normandie Avenue / Manchester Boulevard</li> <li>• Vermont Avenue / Manchester Boulevard</li> <li>• Hoover Avenue / Manchester Boulevard</li> <li>• Figueroa Street / Manchester Boulevard</li> <li>• I-110 Southbound On/Off-Ramps / Manchester Boulevard</li> <li>• I-110 Northbound On/Off-Ramps / Manchester Boulevard</li> <li>• Crenshaw Boulevard / Florence Avenue</li> </ul>	Project Applicant	DPW-Transportation & Traffic Division	Payment to LADOT shall be completed prior to issuance of first building permit for Arena construction, following excavation	
3.14-19: Operation of the Proposed Project ancillary land uses would cause significant impacts on neighborhood streets under cumulative conditions.	<p><b>Mitigation Measure 3.14-19(a)</b></p> <p>Implement Neighborhood Traffic Management Plan component of Event TMP, which is contained in Mitigation Measure 3.14-2(a).</p>	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)
	<p><b>Mitigation Measure 3.14-19(b)</b></p> <p>Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).</p>	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
3.14-20: Daytime events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions.	<p><b>Mitigation Measure 3.14-20</b></p> <p>Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).</p>	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)
3.14-21: Major events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions.	<p><b>Mitigation Measure 3.14-21</b></p> <p>Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).</p>	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
<b>3.14-23:</b> Daytime events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions.	<b>Mitigation Measure 3.14-23(a)</b> Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<b>Mitigation Measure 3.14-23(b)</b> Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)
<b>3.14-24:</b> Major events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions.	<b>Mitigation Measure 3.14-24(a)</b> Implement Mitigation Measure 3.14-3(h) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)
	<b>Mitigation Measure 3.14-24(b)</b> Implement Mitigation Measure 3.14-3(c) (Restripe I-405 NB Off-Ramp at West Century Boulevard).	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)
	<b>Mitigation Measure 3.14-24(c)</b> Implement Mitigation Measure 3.14-3(o) (Coordinate and Optimize Traffic Signals on Inglewood Streets).	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)
	<b>Mitigation Measure 3.14-24(d)</b> Implement Mitigation Measure 3.14-3(g) (I-105 Off-ramp Widening at South Prairie Avenue).	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)
	<b>Mitigation Measure 3.14-24(e)</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)
	<b>Mitigation Measure 3.14-24(f)</b> Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<b>Mitigation Measure 3.14-24(g)</b> Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)
	<b>Mitigation Measure 3.14-24(h)</b> 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.	Project Applicant in consultation with Caltrans	DPW-Transportation & Traffic Division	Payment to Caltrans shall be made prior to issuance of first building permit for Arena construction, following excavation	DPW-Transportation & Traffic Division to confirm that contribution has been made

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
<b>3.14-25:</b> The Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions.	<p><b>Mitigation Measure 3.14-25(a)</b> The project applicant shall implement Mitigation Measures 3.14-2(a) (Implement Event TMP) and 3.14-2(b) (Implement TDM Program), and the entirety of the intersection improvements in Mitigation Measures 3.14-2 and 3.14-3.</p>	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3
	<p><b>Mitigation Measure 3.14-25(b)</b> The project applicant shall implement Mitigation Measures 3.14-11(b) (Lengthen the proposed shuttle pull-out).</p>	See Mitigation Measure 3.14-11(b)	See Mitigation Measure 3.14-11(b)	See Mitigation Measure 3.14-11(b)	See Mitigation Measure 3.14-11(b)
<b>3.14-26:</b> The Proposed Project could have the potential to result in inadequate emergency access under cumulative conditions	<p><b>Mitigation Measure 3.14-26</b> Implement Mitigation Measure 3.14-14 (Local Hospital Access Plan).</p>	See Mitigation Measure 3.14-14	See Mitigation Measure 3.14-14	See Mitigation Measure 3.14-14	See Mitigation Measure 3.14-14
<b>3.14-27:</b> The Proposed Project would substantially affect circulation for a substantial duration of construction under cumulative conditions.	<p><b>Mitigation Measure 3.14-27</b> The project applicant shall implement Mitigation Measure 3.14-15 (Implement Construction Traffic Management Plan).</p>	See Mitigation Measure 3.14-15	See Mitigation Measure 3.14-15	See Mitigation Measure 3.14-15	See Mitigation Measure 3.14-15
<b>3.14-28:</b> 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.	<p><b>Mitigation Measure 3.14-28(a)</b> Implement Mitigation Measures 3.14-3(a) through 3.14-3(o).</p>	See Mitigation Measures 3.14-3(a) through 3.14-3(o)	See Mitigation Measures 3.14-3(a) through 3.14-3(o)	See Mitigation Measures 3.14-3(a) through 3.14-3(o)	See Mitigation Measures 3.14-3(a) through 3.14-3(o)
	<p><b>Mitigation Measure 3.14-28(b)</b> Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS program).</p>	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)	See Mitigation Measure 3.14-2(o)
	<p><b>Mitigation Measure 3.14-28(c)</b> 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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>	Project Applicant	DPW-Transportation & Traffic Division	During operation, the City shall coordinate the Event TMP with the operator of The Forum on days with concurrent events with The Forum	Event TMP shall address concurrent events at The Forum DPW-Transportation & Traffic Division may, as required, designate additional locations to be staffed by TCOs DPW-Transportation & Traffic Division to coordinate between Forum operator and Project Applicant

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-28 (cont.)	<p><b>Mitigation Measure 3.14-28(d)</b> 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).</p>	City of Inglewood, with support from Project Applicant in consultation with NFL Stadium operator	DPW-Transportation & Traffic Division	During operation, the City shall coordinate the Event TMP with the operator of the NFL Stadium on days with concurrent events with the NFL Stadium	Event TMP shall address concurrent events at the NFL Stadium.  DPW-Transportation & Traffic Division may, as required, designate additional locations to be staffed by TCOs  DPW-Transportation & Traffic Division to coordinate between NFL Stadium operator and Project Applicant
	<p><b>Mitigation Measure 3.14-28(e)</b> Implement Mitigation Measure 3.14-2(c) (West Century Boulevard/La Cienega Boulevard Improvements).</p>	See Mitigation Measure 3.14-2(c)	See Mitigation Measure 3.14-2(c)	See Mitigation Measure 3.14-2(c)	See Mitigation Measure 3.14-2(c)
	<p><b>Mitigation Measure 3.14-28(f)</b> 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.</p>	City of Inglewood, with support from Project Applicant in consultation with NFL Stadium operator	DPW-Transportation & Traffic Division	During operation, the City shall require the NFL Stadium TMOP to incorporate special traffic management provisions prior to the first NFL Stadium event that would utilize the Project garages	DPW-Transportation & Traffic Division to coordinate between NFL Stadium operator and Project Applicant
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.	<p><b>Mitigation Measure 3.14-29(a)</b> Implement Mitigation Measure 3.14-3(h) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).</p>	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)
	<p><b>Mitigation Measure 3.14-29(b)</b> Implement Mitigation Measure 3.14-3(c) (Restripe I-405 NB Off-Ramp at West Century Boulevard).</p>	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)
	<p><b>Mitigation Measure 3.14-29(c)</b> Implement Mitigation Measure 3.14-3(o) (Coordinate and Optimize Traffic Signals on Inglewood Streets).</p>	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)
	<p><b>Mitigation Measure 3.14-29(d)</b> Implement Mitigation Measure 3.14-3(g) (I-105 Off-ramp Widening at South Prairie Avenue).</p>	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-29 (cont.)	<b>Mitigation Measure 3.14-29(e)</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)
	<b>Mitigation Measure 3.14-29(f)</b> Implement the trip reduction measures included in the Project Transportation Demand Management Program described in Mitigation Measure 3.14-2(b) (Implement TDM Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<b>Mitigation Measure 3.14-29(g)</b> Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)
<b>3.14-30:</b> 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.	<b>Mitigation Measure 3.14-30(a)</b> The project applicant shall implement Mitigation Measures 3.14-2(a) (Implement Event TMP), 3.14-2(b) (Implement TDM Program), and the intersection improvements in Mitigation Measures 3.14-2 and 3.14-3.	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3
	<b>Mitigation Measure 3.14-30(b)</b> The project applicant shall implement Mitigation Measures 3.14-11(b) (Lengthen the proposed shuttle pull-out).	See Mitigation Measure 3.14-11(b)	See Mitigation Measure 3.14-11(b)	See Mitigation Measure 3.14-11(b)	See Mitigation Measure 3.14-11(b)
	<b>Mitigation Measure 3.14-30(c)</b> 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.	Project Applicant	DPW-Transportation & Traffic Division	During operation, coordination with the City and NFL Stadium operator to develop a mutually acceptable strategy for accommodating shuttles buses shall be required prior to the first concurrent event with the NFL Stadium	
<b>3.14-31:</b> 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.	<b>Mitigation Measure 3.14-31</b> Implement Mitigation Measure 3.14-14 (Implement Local Hospital Access Plan).	See Mitigation Measure 3.14-14	See Mitigation Measure 3.14-14	See Mitigation Measure 3.14-14	See Mitigation Measure 3.14-14

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
<b>3.14-32:</b> 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.	<b>Mitigation Measure 3.14-32</b> The project applicant shall implement Mitigation Measure 3.14-15 (Implement Construction Traffic Management Plan).	See Mitigation Measure 3.14-5	See Mitigation Measure 3.14-5	See Mitigation Measure 3.14-5	See Mitigation Measure 3.14-5
<b>3.14-33:</b> 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.	<b>Mitigation Measure 3.14-33(a)</b> Implement Mitigation Measures 3.14-18(a) through 3.14-18(r).	See Mitigation Measures 3.14-18(a) through 3.14-18(r)	See Mitigation Measures 3.14-18(a) through 3.14-18(r)	See Mitigation Measures 3.14-18(a) through 3.14-18(r)	See Mitigation Measures 3.14-18(a) through 3.14-18(r)
	<b>Mitigation Measure 3.14-33(b)</b> Implement Mitigation Measure 3.14-28(c) (Additional TCO placement and temporary lane changes at select intersections).	See Mitigation Measure 3.14-28(b)	DPW-Transportation & Traffic Division	See Mitigation Measure 3.14-28(c)	
	<b>Mitigation Measure 3.14-33(c)</b> 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).	See Mitigation Measure 3.14-28(f)	See Mitigation Measure 3.14-28(f)	See Mitigation Measure 3.14-28(f)	See Mitigation Measure 3.14-28(f)
<b>3.14-34:</b> 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.	<b>Mitigation Measure 3.14-34(a)</b> Implement Mitigation Measure 3.14-3(h) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)	See Mitigation Measure 3.14-3(h)
	<b>Mitigation Measure 3.14-34(b)</b> Implement Mitigation Measure 3.14-3(c) (Restripe I-405 NB Off-Ramp at West Century Boulevard).	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)	See Mitigation Measure 3.14-3(c)
	<b>Mitigation Measure 3.14-34(c)</b> Implement Mitigation Measure 3.14-3(o) (Coordinate and Optimize Traffic Signals on Inglewood Streets).	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)	See Mitigation Measure 3.14-3(o)
	<b>Mitigation Measure 3.14-34(d)</b> Implement Mitigation Measure 3.14-3(g) (I-105 Off-ramp Widening at South Prairie Avenue).	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)	See Mitigation Measure 3.14-3(g)
	<b>Mitigation Measure 3.14-34(e)</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)	See Mitigation Measure 3.14-2(a)



Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.14 Transportation and Circulation (cont.)</b>					
3.14-34 (cont.)	<b>Mitigation Measure 3.14-34(f)</b> Implement the trip reduction measures included in the Project Transportation Demand Management Program described in Mitigation Measure 3.14-2(b) (TDM Program).	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)	See Mitigation Measure 3.14-2(b)
	<b>Mitigation Measure 3.14-34(g)</b> Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)	See Mitigation Measure 3.14-8(b)
<b>3.14-35:</b> 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.	<b>Mitigation Measure 3.14-35(a)</b> The project applicant shall implement Mitigation Measures 3.14-2(a) (Implement Event TMP), 3.14-2(b) (Implement TDM Program), and the entirety of the intersection improvements in Mitigation Measures 3.14-2 and 3.14-3.	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3	See Mitigation Measures 3.14-2 and 3.14-3
	<b>Mitigation Measure 3.14-35(b)</b> The project applicant shall implement Mitigation Measures 3.14-11(b) (Lengthen Proposed Shuttle Pull-Out).	See Mitigation Measure 3.14-11(b)	See Mitigation Measure 3.14-11(b)	See Mitigation Measure 3.14-11(b)	See Mitigation Measure 3.14-11(b)
	<b>Mitigation Measure 3.14-35(c)</b> 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.	City of Inglewood, with support from Project Applicant in consultation with NFL Stadium operator	DPW-Transportation & Traffic Division	During operation, the City shall coordinate the Event TMP with the operator of the NFL Stadium on days with concurrent events with the NFL Stadium, to occur prior to the first concurrent event and to be implemented thereafter during operations	DPW-Transportation & Traffic Division to ensure that there is coordination with NFL Stadium TMOP operator
<b>3.14-36:</b> 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.	<b>Mitigation Measure 3.14-36</b> Implement Mitigation Measure 3.14-14 (Implement Local Hospital Access Plan).	See Mitigation Measure 3.14-14	See Mitigation Measure 3.14-14	See Mitigation Measure 3.14-14	See Mitigation Measure 3.14-14
<b>3.14-37:</b> 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.	<b>Mitigation Measure 3.14-37</b> The project applicant shall implement Mitigation Measure 3.14-15 (Implement Construction Traffic Management Plan).	See Mitigation Measure 3.14-15	See Mitigation Measure 3.14-15	See Mitigation Measure 3.14-15	See Mitigation Measure 3.14-15

Impact	Mitigation Measure	Implementing Party	Monitoring Party	Timing	Notes
<b>3.15 Utilities and Service Systems</b>					
<p><b>3.15-9:</b> 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.</p>	<p><b>Mitigation Measure 3.15-9</b> Implement Mitigation Measure 3.9-1(a) (Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB).</p>	<p>See Mitigation Measure 3.9-1(a)</p>	<p>See Mitigation Measure 3.9-1(a)</p>	<p>See Mitigation Measure 3.9-1(a)</p>	<p>See Mitigation Measure 3.9-1(a)</p>
<p><b>3.15-10:</b> 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.</p>	<p><b>Mitigation Measure 3.15-10</b> Implement Mitigation Measure 3.9-1(a) (Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB).</p>	<p>See Mitigation Measure 3.9-1(a)</p>	<p>See Mitigation Measure 3.9-1(a)</p>	<p>See Mitigation Measure 3.9-1(a)</p>	<p>See Mitigation Measure 3.9-1(a)</p>

## Project Design Features

Design Feature	Implementing Party	Monitoring Party	Timing	Notes
<p><b>Construction Project Design Feature 3.2-1</b></p> <p>The project applicant will implement the following construction equipment features for equipment operating at the Project Site, as well as the following construction protocols. These features and protocols would be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment and comply with such protocols. Construction features would include the following:</p> <ul style="list-style-type: none"> <li>• The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (US EPA) Tier 4 Final off-road emissions standards for all equipment rated at 50 horsepower (hp) or greater. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.</li> <li>• During plan check, the Project representative will make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used during construction. The inventory will include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be maintained on site at the time of mobilization for each applicable piece of construction equipment.</li> <li>• Equipment such as concrete/industrial saws, pumps, aerial lifts, material hoist, air compressors, and forklifts must be electric or alternative-fueled (i.e., non-diesel). Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment must be located at least 100 feet from air quality sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.</li> <li>• To control dust emissions during soil disturbing phases such as demolition, site preparation, and grading and excavation, the Project shall apply water at least every 2 hours per day on active areas of disturbance and paved roads.</li> <li>• Contractors will maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.</li> <li>• Construction activities must be discontinued during second-stage smog alerts. Records of discontinued construction activities due to second stage smog alerts will be maintained on site by the contractor.</li> </ul>	Project Applicant	DPW-Engineering Division	<p>Construction equipment features for equipment operating at the Project Site, as well as the construction protocols shall be included in applicable bid documents prior to seeking bids for construction</p> <p>A comprehensive inventory of all off-road construction equipment for activities being permitted shall be made available to SCAQMD prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase, as applicable</p> <p>Construction equipment features for equipment operating at the Project Site, as well as the construction protocols shall be implemented during any ground disturbing activities and construction activities on an on-going basis</p>	Inventory of construction equipment, including specifications and permitting status, to be maintained by Project applicant, available for review upon request by DPW-Engineering Division or SCAQMD

## Project Design Features

Design Feature	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>Heavy duty construction trucks (import, export, delivery, etc.) would be prohibited from traveling to and from the Project Site during the pre-and post-event hours on major event days at the NFL Stadium and/or The Forum.</li> <li>All haul truck trips would be prohibited from leaving the site after 3:00 PM.</li> </ul>				
<p><b>Operations Project Design Feature 3.2-2</b></p> <p>The project applicant will implement the following operational equipment requirements and operation protocols for equipment operating at the Project Site. These features would be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment and comply with such protocols. Operation features would include the following:</p> <ul style="list-style-type: none"> <li>All emergency generators used for Project operations shall be selected from the SCAQMD certified generators list and meet applicable federal standards for diesel emissions. For after-treatment of engine exhaust air, a diesel particulate filter shall be provided to meet the emission level requirements of SCAQMD. The Project would have two emergency generators and two fire pumps, each could operate up to two hours per day and a total of 50 hours per year for testing and maintenance (per SCAQMD Rule 1470 limit) to ensure reliability in the case of a power outage. Testing of the generators for maintenance and operations purposes would be permitted only during non-event days.</li> <li>Heavy-duty delivery trucks would be prohibited from traveling to and from the Project Site during the two hours before and one hour after an event at the Project of more than 9,500 attendees, and during pre-and post-event hours during major event days at the NFL Stadium and/or The Forum.</li> </ul>	Project Applicant	DPW-Engineering Division	Operational equipment requirements and operation protocols for equipment operating shall be included in applicable bid documents prior to seeking bids for operational emergency generator equipment and deliveries using heavy-duty delivery trucks  Testing of the generators for maintenance and operations shall occur annually during operation  Prohibition of heavy-duty delivery trucks shall be enforced during operation	Inventory of generators, including specifications and permitting status, to be maintained by Project applicant, available for review upon request by DPW-Engineering Division or SCAQMD  Project Applicant to maintain log showing date/time that delivery trucks travel to/from Arena during events specified in DF 3.2-2; lot to be provided to DPW-Engineering Division or SCAQMD upon request
<p><b>Project Design Feature 3.3-1</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>The Arena Structure would be designed to achieve Leadership in Energy and Environmental Design (LEED) Bird Collision Deterrence credits;</li> <li>The Arena Structure would be designed to address the best practices of the US 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;</li> <li>The Arena façade and envelope composition would be made of translucent polymer* panels with a pattern or metal substructure, along with opaque photovoltaic panels. The materials would be selected with the goal of achieving a maximum threat factor of 25 pursuant to the American Bird Conservancy Bird Collision Deterrence Material Threat Factor Reference Standard. To be consistent with this standard, the project applicant has committed that a large majority of externally visible glass panels would include a fritted finish,** which is both energy efficient and is perceived by birds as a solid surface, reducing the potential for fatal collisions; and</li> </ul>	Project Applicant	ECDD-Planning Division	Building design features shall be shown on building plans for the Arena, prior to the issuance of building permits for the Arena	

## Project Design Features

Design Feature	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>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.</li> </ul> <p>(Footnote *: Translucent polymer panels will be made of either ethylene tetrafluoroethylene (ETFE) or polytetrafluoroethylene (PTFE).)</p> <p>(Footnote **: Fritted glass is glass that has been fused with pigmented glass particles.)</p>				
<p>A proposed 15-foot-high permanent sound barrier would be constructed along the full length of the southern boundary of the Arena Site. A temporary, additional 7-foot-high sound barrier "topper" would be placed along the eastern two-thirds of this permanent wall for the duration of construction activities on the Arena Site. Permanent 12-foot-high sound barriers are proposed to be constructed along the shared boundaries of the Arena Site and the residences located at 10204 South Prairie Avenue and 10226 South Prairie Avenue prior to the start of any major construction activities on the Arena Site. A temporary 12-foot-high sound barrier is proposed along the western boundary of the Arena Site from the southern boundary to approximately mid-block between West 101st Street and West 102nd Street. Barriers would not be placed in front of the residences located at 10204 South Prairie Avenue and 10226 South Prairie Avenue so as to continue to allow resident access to those parcels from South Prairie Avenue.</p>	Project Applicant	ECDD-Building Safety Division	Sound barriers shall be constructed prior to the start of any construction activities on the Arena Site, consistent with the Construction Noise Reduction Program and Operational Noise Reduction Program	
<p>A temporary 16-foot-high sound barrier is proposed along the shared boundary of the Arena Site and the Airport Park View Hotel, which would be replaced with a permanent 12-foot-high sound wall after the conclusion of major construction activities on the Arena Site. Similarly, the temporary 12-foot-high sound barrier proposed at the northeast corner of the Arena Site and West 102nd Street during construction would be replaced with a permanent 8-foot-high sound wall at the conclusion of major construction activities. A temporary 12-foot-high sound barrier is also proposed at the southeast corner of the Arena Site and West 102nd Street between the southern sidewalk of West 102nd Street and the northern facade of the industrial use located adjacent to the Arena Site to the east, south of West 102nd Street.</p>	Project Applicant	ECDD-Building Safety Division	Sound barriers shall be constructed prior to the start of any construction activities on the Arena Site, consistent with the Construction Noise Reduction Program and Operational Noise Reduction Program	

# AB 987 Conditions of Approval

Condition of Approval	Implementing Party	Monitoring Party	Timing	Notes
<p><b>LEED Gold Certification</b></p> <p>The project applicant shall qualify for LEED Gold certification for all buildings constructed as part of the Project within one year of the completion of the first NBA season at the Arena. The LEED Gold certification qualification shall include the following components:</p> <ul style="list-style-type: none"> <li>• Access to Quality Transit.</li> <li>• Sustainable Sites: rainwater management, open space, heat island reduction, light pollution reduction and percentage of permeable surfaces, including roof-top gardens.</li> <li>• Water Efficiency: use of ultra-low flow fixtures in restrooms; reduction in indoor water use by a minimum of 40 percent; 100% recycled water to service project landscaping designed for low water usage.</li> <li>• Energy and Atmosphere: optimized performance and renewable energy production; provide photovoltaic panels on the main arena building roof; fund the purchase of carbon offsets; Title 24 compliance; use of 100% light emitting diode (LED) lighting indoors and outdoors throughout the site; and implementation of high efficiency HVAC-related strategies.</li> <li>• Materials and Resources: recycle at least 75 percent of demolition materials.</li> <li>• Indoor Environmental Quality: enhanced indoor and outdoor air quality; meet American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 62.1:2010 indoor air quality requirements and ASHRAE 55 thermal comfort requirements.</li> <li>• Innovation: implementation of the FanFirst/Occupant Comfort Survey; green education program; LEED Operations + Management (O+M) Starter Kit (Pest Management and Green Cleaning Program); the purchasing of 100% LED lamps.</li> </ul> <p>The project applicant shall seek LEED Gold certification for all buildings constructed as part of the Project within one year of the completion of the first NBA season at the Arena, anticipated to occur in the summer of 2025.</p>	<p>Project Applicant</p>	<p>ECDD-Building Safety Division</p>	<p>Within one year of completion of the first NBA season of the Arena</p>	
<p><b>TDM Program</b></p> <p>The project applicant shall implement the TDM Program appearing at Attachment C to the "AB 987 Application for the Inglewood Basketball and Event Center" (November 2018) (copy attached). The TDM Program shall achieve the following standards:</p> <ul style="list-style-type: none"> <li>• 15% reduction in vehicle trips on an annual basis as compared to Project operations absent the TDM Program no later than January 1, 2030; and</li> <li>• 7.5% reduction in vehicle trips on an annual basis as compared to Project operations absent the TDM Program no later than the end of the first NBA season in the Arena.</li> </ul> <p>The TDM Program shall include the following components:</p> <p><i>TDM 1 - Encourage Alternative Modes of Transportation (Rail, Public Bus, and Vanpool)</i> Provide monetary incentives and bus stop improvements near the Project Site.</p> <p><i>TDM 2 - Event-day Dedicated Shuttle Services</i></p>	<p>Project Applicant</p>	<p>DPW-Transportation &amp; Traffic Division</p>	<p>The TDM Program shall be finalized by 6 months prior to the issuance of certificate of occupancy for the Arena; subject to review and approval by DPW-Transportation &amp; Traffic Division</p> <p>The approved TDM Program shall be implemented throughout Project operation</p>	<p>Project Applicant shall commence design and planning for the TDM Program in coordination with DPW-Transportation &amp; Traffic Division not less than 24 months prior to the anticipated completion date for the Arena (currently estimated July 2024)</p> <p>Create a schedule for development of the TDM Program to ensure finalization by 6 months prior to the issuance of certificate of occupancy for the Arena</p>

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Condition of Approval	Implementing Party	Monitoring Party	Timing	Notes
<p>Provide connectivity to the existing and future Metro Rail Stations and take advantage of the transportation resources in the area. Ensure a sufficient number of shuttles will be provided for successful and convenient connectivity, with short wait times.</p> <p><i>TDM 3 – Encourage Carpools and Zero-Emission Vehicles</i></p> <p>Provide several incentives that would encourage carpooling and zero emission vehicles as a means for sharing access to and from the Project Site.</p> <p><i>TDM 4 – Encourage Active Transportation</i></p> <p>Include features which would enhance the access for bicyclists and pedestrians.</p> <p><i>TDM 5 – Employee Vanpool Program</i></p> <p>Provide an employee vanpool program that would accommodate 5% of the employees in conjunction with TDM 1.</p> <p><i>TDM 6 – Park-n-Ride Program</i></p> <p>Provide a regional park-n-ride program that would utilize charter coach buses.</p> <p><i>TDM 7 - Information Services</i></p> <p>Provide a number of services which would inform the public about activities at the IBEC.</p> <p><i>TDM 8 – Reduce On-Site Parking Demand</i></p> <p>Include features that reduce on-site parking demand.</p> <p><i>TDM 9 – Event-Day Local Microtransit Service</i></p> <p>Provide a local minibus/microtransit service for event days that would accommodate up to 66 employees and 180 attendees.</p>			<p>The project applicant shall prepare and submit an annual monitoring report to DPW-Transportation &amp; Traffic Division not more than 60 days after the final basketball game at the arena for that year; after initial year of operations, City may adjust date of submittal of annual report to be concurrent with any annual report submitted to the City pursuant to Development Agreement</p> <p>A 7.5% reduction of vehicle trips on an annual basis shall be achieved no later than the end of the first NBA season in the Arena</p> <p>A 15% reduction of vehicle trips on an annual basis shall be achieved no later than January 1, 2030</p>	<p>Revisions to TDM Program subject to review and approval of DPW-Transportation &amp; Traffic Division</p> <p>Shuttle routes (TDM 2) subject to review and approval by DPW-Transportation &amp; Traffic Division</p> <p>Project Applicant to maintain documentation of implementation of TDM Program, and to make documentation available to DPW-Transportation &amp; Traffic Division upon request. If the project applicant fails to verify achievement of the 15% vehicle trip reduction by January 1, 2030, the City shall impose additional measures on the project applicant to reduce vehicle trips by 17%, or by 20% if there is a rail transit line with a stop within ¼-mile of the Arena, by January 1, 2035</p>

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Condition of Approval	Implementing Party	Monitoring Party	Timing	Notes
<p><b><u>Air Pollutant Emissions</u></b></p> <p>The Project shall achieve reductions of 400 tons of oxides of nitrogen (NOx) and 10 tons of particulate matter less than 2.5 microns in diameter (PM2.5) over 10 years following the commencement of construction of the project. Of these amounts, 130 tons of NOx and 3 tons of PM2.5 must be achieved within the first year following commencement of construction. If the project sponsor can demonstrate and verify to the South Coast Air Quality Management District that it has invested at least \$30 million dollars toward achieve those air pollutant reductions, only one-half of these reduction amounts must be achieved.</p>	Project Applicant	ECDD-Building Safety Division	130 tons of NOx and 3 tons of PM2.5 (or 65 tons of NOx and 1.5 tons of PM2.5, if at least \$30 million are invested in such reduction measures) in the first year following commencement of construction of the Project  400 tons of NOx and 10 tons of PM2.5 (or 200 tons of NOx and 5 tons of PM2.5 if at least \$30 million are invested in such reduction measures) within 10 years following commencement of construction of the Project	
<p><b><u>Solid Waste</u></b></p> <p>The Project will comply with the requirements for commercial and organic waste recycling in Chapters 12.8 (commencing with Public Resources Code section 42649) and 12.9 (commencing with Public Resources Code Section 42649.8), as applicable.</p> <p>The Project shall source separate its solid waste and subscribe a recycling service consistent with applicable City of Inglewood ordinances and state regulations.</p> <p>The Project shall arrange for recycling services for its organic solid waste.</p> <p>The Project shall source separate and arrange for recycling of organic solid waste.</p> <p>Materials produced during demolition of existing streets, pavements and concrete foundations shall be recycled if the materials conform to the specifications of the Standard Specifications for Public Works Construction, the latest Edition ("The Green Book").</p> <p>The Project shall recycle at least 75 percent of demolition materials.</p> <p>The Project shall subscribe to a municipal solid waste collection service that is approved by the City and that meets applicable City and State waste collection, management, recycling and diversion requirements.</p> <p>The Project shall comply with all federal, State, and local regulations related to solid waste.</p>	Project Applicant	PW-Environmental Services Division	Operational measures, including compliance with regulations, shall be implemented on an ongoing basis during Project operations  Comply with demolition related measures during demolition phase of construction  Subscribe to a municipal solid waste collection service prior to operation of the Project	



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Condition of Approval	Implementing Party	Monitoring Party	Timing	Notes
<p><b>GHG Emissions</b></p> <p>The Project shall implement the following measures such that the Project does not result in any 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, and based on the emissions estimates, calculations and methodologies set forth in the Project Applicant's application to the Governor under AB 987, as approved by the Governor and in light of the determination by the State Air Resources Board.</p> <p>Measures to achieve LEED Gold Qualifying as Local Direct Measures (see above).</p> <p>TDM Program (see above).</p> <p>Waste Reduction and Diversion (see above).</p>	See above	See above	See above	See above
<p><b>On-Site Local Direct Measures</b></p> <p><i>Smart Parking System.</i> The Applicant shall install 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.</p>	Project Applicant	DPW-Transportation & Traffic	Prior to issuance of certificate of occupancy for the Arena	
<p><i>On-Site Electric Vehicle Charging Stations.</i> The Applicant shall install a minimum of three hundred and 330 electric vehicle charging stations (EVCS) within the three proposed on-site parking structures serving the Project for use by employees, visitors, event attendees, and the public.</p>	Project Applicant	DPW-Transportation & Traffic	Prior to issuance of certificate of occupancy for the Arena	
<p><i>Zero Waste Program.</i> The Applicant shall implement a waste and diversion program for operations of the Project, with the exception of the hotel, with a goal of reducing landfill waste to zero. Effectiveness of the program shall be monitored annually through the U.S. Environmental Protection Agency's WasteWise program or a similar annual reporting system.</p>	Project Applicant	DPW-Environmental Services Division	Ongoing during Project operations Monitoring reports to be submitted annually	
<p><i>Renewable Energy.</i> The Applicant shall reduce GHG emissions associated with energy demand of the Project Arena that exceeds on-site energy generation capacity by using Renewable Energy during Project operations for a period sufficient to achieve GHG emission reductions equal to approximately 2.5% of the total estimate of GHG emissions that could occur in the hypothetical 100% backfill emissions scenario.</p>	Project Applicant	ECDD-Building Safety Division	From commencement of Project operations through achievement of GHG reductions through renewable energy of no less than 7,617 MT CO <sub>2</sub> e	
<p><i>Solar Photovoltaic System.</i> Installation of a 700-kW solar photovoltaic system generating approximately 1,085,000 kW-hours of energy annually.</p>	Project Applicant	ECDD-Building Safety Division	Prior to issuance of certificate of occupancy for the Arena	
<p><b>Off-Site Local Direct Measures</b></p> <p><i>City of Inglewood Municipal Fleet Vehicles ZEV Replacement.</i> The Applicant shall enter into an agreement with the City of Inglewood to cover 100% of the cost of replacement of ten (10) municipal fleet vehicles that produce GHG emissions with Zero-Emissions Vehicles (ZEVs) and related infrastructure (e.g., EVCS) for those vehicles prior to the issuance of grading permits.</p>	Project Applicant and DPW-Transportation & Traffic	DPW-Transportation & Traffic	Prior to issuance of the first grading permit for the Project	

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Condition of Approval	Implementing Party	Monitoring Party	Timing	Notes
<i>ZEV Replacement of Transit Vehicles Operating Within the City of Inglewood.</i> The Applicant shall enter into an agreement with the City of Inglewood to cover 100% of the cost of replacement of two (2) transit vehicles that operate within the City of Inglewood that produce GHG emissions with ZEVs and related infrastructure (e.g., EVCS) for those vehicles prior to issuance of grading permits.	Project Applicant and DPW-Transportation & Traffic	DPW-Transportation & Traffic	Prior to issuance of the first grading permit for the Project	
<i>Local EV Charging Stations in the City of Inglewood.</i> Prior to the issuance of grading permits, the Applicant shall enter into agreements to install twenty (20) EVCS at locations in the City of Inglewood. These EVCS will be available for use by the public for charging electric vehicles.	Project Applicant	DPW-Transportation & Traffic	Prior to issuance of first grading permit for the Project	
<i>City of Inglewood Tree Planting Program.</i> Prior to the issuance of grading permits, the Applicant shall develop or enter into partnerships with existing organizations to develop a program to plant 1,000 trees within the City of Inglewood.	Project Applicant	ECDD-Building Safety Division	The program shall be in place prior to issuance of first grading permit for the Project	
<i>1,000 Local Residential Electric Vehicle Charging Stations.</i> Prior to the issuance of grading permits for the Project, the Applicant shall implement a program to cover 100% of the cost of purchasing and installing 1,000 electric vehicle ("EV") chargers for residential use in local communities near the Project site. Residents in the City of Inglewood and surrounding communities who purchase a new or used battery EV shall be eligible for the program. City of Inglewood residents will 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 EV participate in the program.	Project Applicant	ECDD-Building Safety Division	The program shall be in place prior to issuance of first grading permit for the Project	
<b>Implementation of Local, Direct Measures</b> The Applicant shall implement all on-site local, direct measures identified above by the end of the first NBA regular season or June of the first NBA regular season, whichever is later, during which an NBA team has played at the Project Arena. All off-site, local, direct measures identified above must be in excess of any regulatory requirement or any previously planned action by the City of Inglewood that would have occurred otherwise.	See above	See above	See above	See above
<b>Carbon Offset Credits</b> To the extent carbon offsets are used to mitigate GHG emissions from the project, the Applicant will purchase voluntary carbon credits issued by an accredited carbon registry, such as the American Carbon Registry, Climate Action Reserve, and Verra, for the net increase in construction and operational emissions. Contracts to purchase carbon offset credits for construction emissions will be entered into prior to the issuance of grading permits, and contracts to purchase carbon offset credits for operational emissions will be entered into prior to the issuance of the final certificate of occupancy for the Proposed Project. Copies of the contract(s) will promptly be provided to CARB, the Governor's Office, and the City of Inglewood to verify that construction and operational emissions have been offset.	Project Applicant	ECDD- Building Safety Division	Contracts to purchase carbon offset credits for construction emissions shall be entered into prior to issuance of grading permits for the Project  Contracts to purchase carbon offset credits for operational emissions shall be entered into by issuance of the final certificate of occupancy for the Arena	

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City Council Staff Report

Attachment 9:

Draft General Plan Amendment Resolution

RESOLUTION NO. \_\_\_\_\_

**A RESOLUTION OF THE CITY COUNCIL ADOPTING  
AMENDMENTS TO THE TO THE LAND USE,  
CIRCULATION, AND SAFETY ELEMENTS OF THE  
INGLEWOOD GENERAL PLAN FOR THE INGLEWOOD  
BASKETBALL AND ENTERTAINMENT CENTER  
PROJECT.**

General Plan Amendment No. GPA-2020-003

**SECTION 1.**

WHEREAS, Section 65302, subdivision (a) of the California Government Code requires certain elements to be included in the City of Inglewood General Plan (General Plan);

WHEREAS, Murphy's Bowl, LLC (Project Sponsor), seeks the development of the Inglewood Basketball and Entertainment Center (IBEC) that includes an arena intended to promote the enjoyment and recreation of the public by providing access to the City's residents in the form of spectator sports, specifically basketball, with up to 18,000 fixed seats to host National Basketball Association games, and with up to 500 additional temporary seats for other events such as family shows, concerts, corporate and community events, and other sporting events; an up to 85,000-square foot team practice and athletic training facility; up to 71,000 square feet of LA Clippers office space; an up to 25,000-square foot sports medicine clinic; up to 63,000 square feet of ancillary and related arena uses including retail and dining; an outdoor plaza adjacent to the arena; parking facilities; relocation of a City of Inglewood groundwater well; and various circulation, infrastructure, and other ancillary uses (the Project). The Project will also include a limited-service hotel. The area of the IBEC Project is shown in Exhibit A;

WHEREAS, the majority of the Project Site is designated as Industrial in the General Plan Land Use Element; a small approximately 2.7-acre area of

1 the Project Site is designated as Commercial that is adjacent to S. Prairie  
2 Avenue, just south of W. Century Boulevard, comprised of Parcels with  
3 Assessor Identification Numbers:

4			
5	4032-001-005	4032-001-904	4032-008-001
6	4032-001-006	4032-001-906	4032-008-035
7	4032-001-039	4032-001-907	4032-008-903
8	4032-001-900	4032-001-908	4034-005-900
9	4032-001-901	4032-001-910	

10 WHEREAS, implementation of the Project necessitates text and map  
11 amendments to the General Plan, including certain text and map amendments  
12 to the General Plan Land Use, Circulation, and Safety Elements attached to  
13 this Resolution as Exhibits B, C-1, C-2, and C-3 which are incorporated herein  
14 by this reference (collectively, the General Plan Amendments);

15 WHEREAS, on May 1, 2020, the Economic and Community  
16 Development Department Director of the City of Inglewood directed Planning  
17 Division staff to prepare various Project approval materials, including the  
18 General Plan Amendments, and schedule a public hearing before the Planning  
19 Commission;

20 WHEREAS, the proposal was set for a duly-noticed public hearing  
21 before the Planning Commission in the City Council Chambers, Ninth Floor,  
22 of the Inglewood City Hall, on the 17th day of June 2020, beginning at the hour  
23 of 7:00 p.m.;

24 WHEREAS, on June 17, 2020, the Planning Commission conducted the  
25 hearing at the time and place stated above and afforded all persons interested  
26 in the matter of the General Plan Amendment, GPA-2020-003, or in any matter  
27 or subject related thereto, an opportunity to be heard by the Planning  
28 Commission and to submit any testimony or evidence in favor of or against the  
proposed General Plan Amendments;

1           WHEREAS, pursuant to the California Environmental Quality Act,  
2 Public Resources Code, Section 21000 et seq. (CEQA), including without  
3 limitation Section 21168.6.8, the City prepared an Environmental Impact  
4 Report (EIR) for the Project, including the General Plan Amendments, (State  
5 Clearinghouse No. 2018021056), which analyzed environmental impacts of the  
6 proposed Project. Prior to making a recommendation on the Project (including  
7 the General Plan Amendments), the Planning Commission reviewed and  
8 considered the EIR and recommended that the City Council certify the EIR,  
9 make certain environmental findings and adopt a Statement of Overriding  
10 Considerations for significant and unavoidable impacts of the Project that  
11 would remain even with the implementation of necessary mitigation measures  
12 (together, the CEQA Findings), and adopt a Mitigation Monitoring and  
13 Reporting Program (MMRP) for the Project;

14           WHEREAS, after taking public testimony and fully considering all the  
15 issues, the Planning Commission determined that the proposed General Plan  
16 Amendments should be recommended for approval to the City Council; and

17           WHEREAS, the Planning Commission considered the General Plan  
18 Amendments and testimony and information received at the public hearing  
19 relating to the Project, including without limitation the oral and written  
20 reports from City staff, oral reports from City consultants, and the EIR. After  
21 taking public testimony and considering the issues, the Planning Commission  
22 adopted Resolution No. 1869 entitled:

23  
24           **A RESOLUTION OF THE PLANNING COMMISSION OF**  
25           **THE CITY OF INGLEWOOD, CALIFORNIA,**  
26           **RECOMMENDING TO THE CITY COUNCIL FOR**  
27           **APPROVAL AMENDMENTS TO THE LAND USE,**  
28           **CIRCULATION, AND SAFETY ELEMENTS OF THE**  
              **INGLEWOOD GENERAL PLAN FOR THE INGLEWOOD**  
              **BASKETBALL AND ENTERTAINMENT CENTER**  
              **PROJECT.**

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WHEREAS, the matter of Resolution No. 1869 was presented to the City Council on July 7, 2020; and,

WHEREAS, on July 7, 2020, the City Council set a public hearing for GPA-2020-003 before the City Council in the City Council Chamber, Ninth Floor of Inglewood City Hall, on the 21<sup>st</sup> day of July 2020. Notice of the time and place of the hearing was given in compliance with legal requirements; and,

WHEREAS, on July 21, 2020, the City Council conducted the hearing at the time and place stated above and afforded all persons interested in the matter of the General Plan Amendments, or in any matter or subject related thereto, an opportunity to appear before the City Council and be heard and to submit testimony or evidence in favor of or against the proposed amendments.

**SECTION 2.**

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Inglewood, California,, based on the entirety of the materials before the City Council, including without limitation, agenda reports to the Planning Commission and City Council; the EIR and all appendices thereto and supporting information; Planning Commission Resolution No. 1869; City Council Resolution No. \_\_\_\_ (EIR Certification Resolution) including the CEQA Findings and Statement of Overriding Considerations and MMRP attached as Exhibits B and C, respectively, thereto; all plans, drawings, and other materials submitted by the Project Sponsor; minutes, reports, and public testimony and evidence submitted as part of the Planning Commission’s and City Council’s duly-noticed meetings regarding the IBEC Project; the record of proceedings prepared in connection with AB 987 pursuant to Public Resources Code section 21168.6.8; and all other information contained in the City’s administrative record concerning the Project (collectively, the Record), which it has carefully reviewed and considered, the City Council finds as follows:



1           1.     That the foregoing Recitals are true and correct and made a part  
2 of this Resolution.

3           2.     That all procedural requirements for the City Council to approve  
4 the General Plan Amendment have been followed.

5           3.     The General Plan Amendments substantially comply with  
6 applicable requirements of state law and will ensure internal consistency of  
7 the General Plan as required by California Government Code Section 65300.5.

8           4.     As described in Exhibit D (General Plan Consistency Findings),  
9 which is incorporated by reference as though fully set forth herein, the General  
10 Plan Amendments are in general conformity with the General Plan, as  
11 proposed to be amended, and the Project and the approvals required for  
12 implementation of the Project, are, on balance, consistent with the General  
13 Plan, as proposed to be amended.

14          5.     The General Plan Amendments establish appropriate land uses  
15 and development standards for the efficient and orderly development of the  
16 Project and the adoption of the General Plan Amendments is reasonably  
17 related to the protection of the public health, safety, and welfare, as further  
18 described in the City Council Agenda Report and City Council Resolution No.  
19 \_\_\_\_ (EIR Certification Resolution), which includes a Statement of Overriding  
20 Considerations.

21          6.     An EIR has been prepared for the IBEC Project, including the  
22 proposed General Plan Amendments. Prior to final approval of these General  
23 Plan Amendments the City Council certified the EIR and adopted CEQA  
24 Findings including a Statement of Overriding Considerations for significant  
25 and unavoidable impacts of the Project that would remain significant even  
26 with the implementation of all feasible mitigation measures specified in the  
27 EIR, and adopted an MMRP for the Project in accordance with CEQA as  
28 provided in City Council Resolution No. \_\_\_\_ (EIR Certification Resolution).

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**SECTION 3.**

BE IT FURTHER RESOLVED, that pursuant to the foregoing recitations and findings the City Council of the City of Inglewood, California hereby approves and adopts the General Plan Amendments in the form attached to this Resolution as Exhibits B, C-1, C-2, and C-3.

This Resolution to approve General Plan Amendment No. 2020-003 (GPA-2020-003) attached hereto as Exhibits B, C-1, C-2, and C-3. is passed, approved and adopted, this 21st day of July 2020.

The City Clerk shall certify to the passage and adoption of this Resolution and to its approval by the City Council and this Resolution shall be in full force and effect immediately upon adoption.

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**James T. Butts**  
**Mayor**

**ATTEST:**

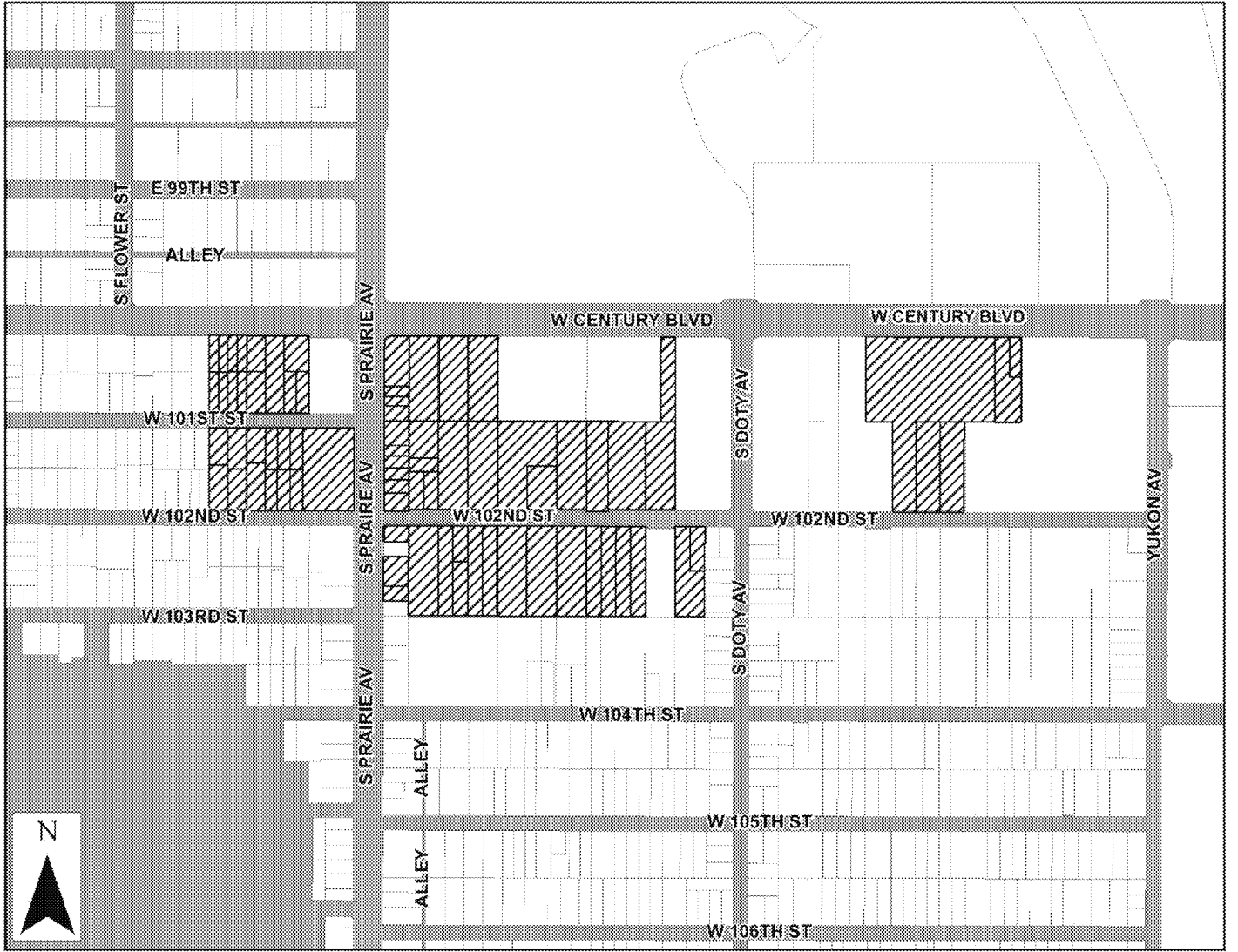
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**Yvonne Horton**  
**City Clerk**

GPA Resolution

Exhibit A:

IBEC Area Map



GPA Resolution

Exhibit B:

Text Amendments to the Inglewood General Plan

TEXT AMENDMENTS TO  
THE INGLEWOOD GENERAL PLAN

Added text is shown in **bold underline**; removed text is shown in ~~**bold strikethrough**~~.

**Section 1.**

Land Use Element “Section II – Statement of Objectives” for “Industrial” in Subsection D on pages 7 through 8 is amended to read as follows:

D. Industrial

- Provide a diversified industrial base for the City. Continue to improve the existing industrial districts by upgrading the necessary infrastructure and by eliminating incompatible and/or blighted uses through the redevelopment process.

- Continue the redevelopment of Inglewood by promoting the expansion of existing industrial firms and actively seek the addition of new firms that are environmentally non-polluting.

- Increase the industrial employment opportunities for the city’s residents.

- **Promote the development of sports and entertainment facilities and related uses on underutilized land, in appropriate locations, creating economic development and employment opportunities for the City’s residents.**

Land Use Element “Section VI – Future Land Uses” for “Industrial Land Use” in Subsection C on pages 71 through 74 is amended to read as follows:

C. Industrial Land Use

Usually there are three factors involved in the location of industrial land: infrastructure, compatibility of use, and proximity to an adequate labor force.

[intervening text intentionally omitted]

Industry should be compatible with surrounding land uses. Compact

industrial locations such as an "industrial park" place industries adjacent to other industries, thereby minimizing conflict with residential and commercial areas. In some cases, industrial uses may be placed where residential or commercial land uses are not desirable, such as the area which is under the eastern end of the flight path of Los Angeles International Airport. The Element proposes that the area in the City of Inglewood generally bounded by Crenshaw on the east, La Cienega on the west, Century on the north and 104th Street on the south be designated as industrial from the present residential and commercial. This area is an extremely undesirable location for residential usage because it is severely impacted by jet aircraft noise. The area should be developed with industrial park, commercial, **and/or office park uses, and/or sports and entertainment facilities, and related uses**, utilizing planned assembly district guidelines, **or, in the case of sports and entertainment facilities and related uses, project-specific design guidelines in lieu of the planned assembly district guidelines**, to insure both the quality of the development and **to encourage** its compatibility with surrounding uses.

[intervening text intentionally omitted]

Those industrial areas which front along major arterials such as La Cienega, Florence, or Century will likely be developed for industrial/commercial/office uses, **or sports and entertainment facilities and related uses**.

[intervening text intentionally omitted]

As the construction of the Century Freeway along the City's southern boundary progresses, the highly noise impacted area between Century and 104th which is west of Crenshaw should be recycled from its present residential uses to more appropriate industrial/commercial/office uses, **or sports and entertainment facilities and related uses**. Irrespective of market forces, the City must promote and assist in upgrading of existing industrial uses.

**Section 2.**

Circulation Element Section on “Street Classification Collectors” (within “Part Two – Circulation Plan” in Subpart 4 on pages 20 through 21) is amended to read as follows:

4. COLLECTORS.

~~35. 102nd Street (east of Prairie Avenue)~~

~~36~~ 35. 104th Street

~~37~~ 36. 108th Street (Prairie Avenue to Crenshaw Boulevard)

Circulation Element Section on “Traffic Generators” within “Part Two – Circulation Plan” on page 22 is amended to read as follows:

Certain facilities or areas in and near Inglewood can be identified as being the destination of significant numbers of vehicles:

[Nos. 1 – 7 intentionally omitted]

**8. Inglewood Basketball and Entertainment Center. The sports and entertainment arena can accommodate approximately 18,500 patrons, and includes parking to serve the arena and related uses for approximately 4,125 vehicles, in addition to complementary transportation and circulation facilities.**

Circulation Element Section on “Truck Routes” within “Part Two – Circulation Plan” on page 28 is amended to read as follows:

The purpose of designated truck routes is to restrict heavy weight vehicles to streets constructed to carry such weight, in addition to keeping large vehicles--with their potentially annoying levels of noise, vibration and fumes--from residential



## Exhibit B

neighborhoods. With the exception of two routes, all designated truck routes are along arterial streets. One exception is East Hyde Park Boulevard and Hyde Park Place which have street widths too narrow to be classified an arterial route but which serve various small light manufacturing and heavy commercial businesses located in northeast Inglewood. The second exception is 102nd Street (between 325 feet west of the centerline of ~~Prairie Doty~~ Avenue and Yukon Avenue) which serves the new manufacturing and air freight businesses being developed in the Century Redevelopment Project area.

GPA Resolution

Exhibit C-1:

GP Land Use Element Map Amendments

## EXHIBIT C-1

### MAP AMENDMENT TO THE LAND USE ELEMENT OF THE INGLEWOOD GENERAL PLAN

Land Use Element “Land Use Map” is amended (as depicted below) to show that certain approximately 2.7-acre area located adjacent to S. Prairie Avenue, just south of W. Century Boulevard, comprised of Parcels

4032-001-005	4032-001-906	4032-008-903
4032-001-006	4032-001-907	4034-005-900
4032-001-039	4032-001-908	
4032-001-900	4032-001-910	
4032-001-901	4032-008-001	
4032-001-904	4032-008-035	

to be designated as “Industrial”.



GPA Resolution

Exhibit C-2:

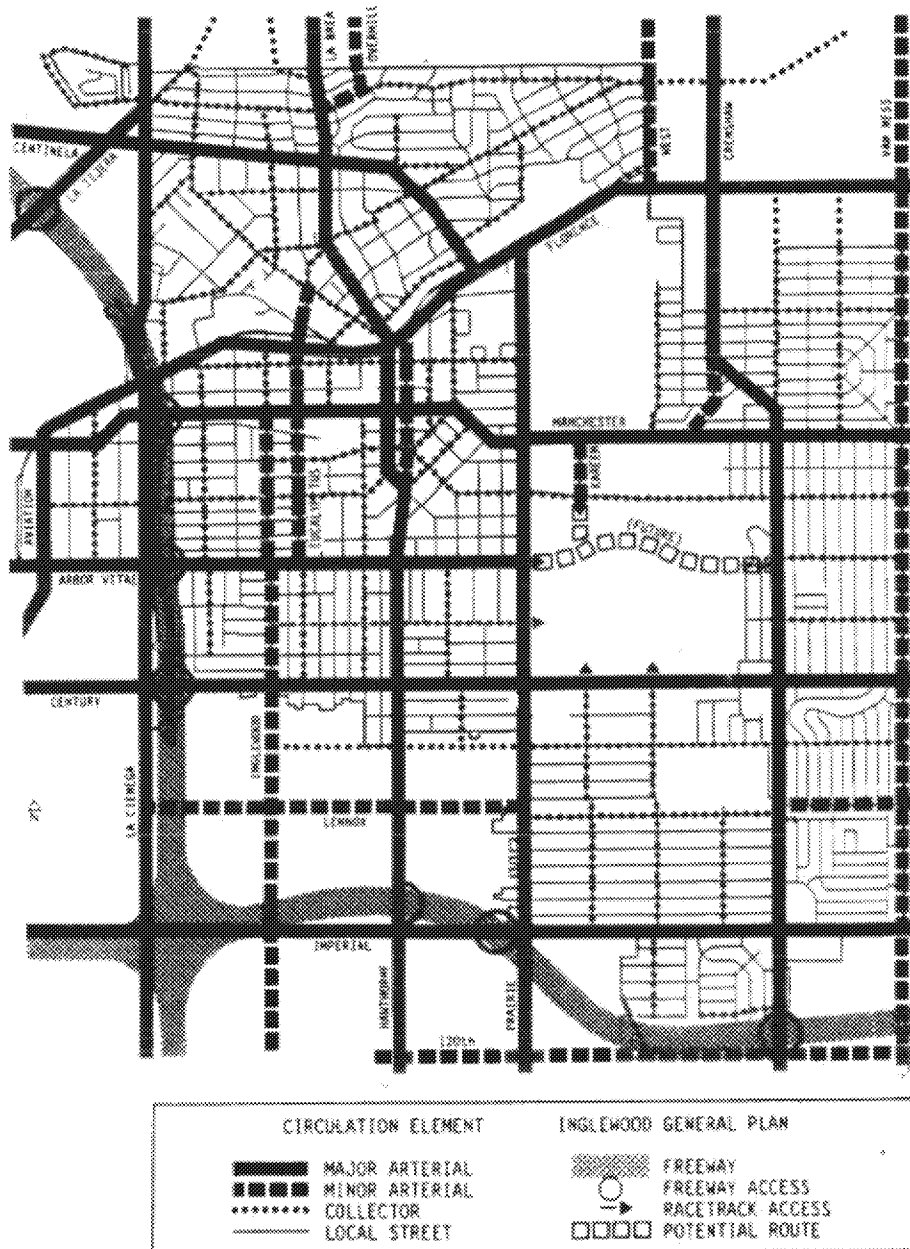
GP Circulation Element Map Amendments

## EXHIBIT C-2

### MAP AMENDMENTS TO THE CIRCULATION ELEMENT OF THE INGLEWOOD GENERAL PLAN

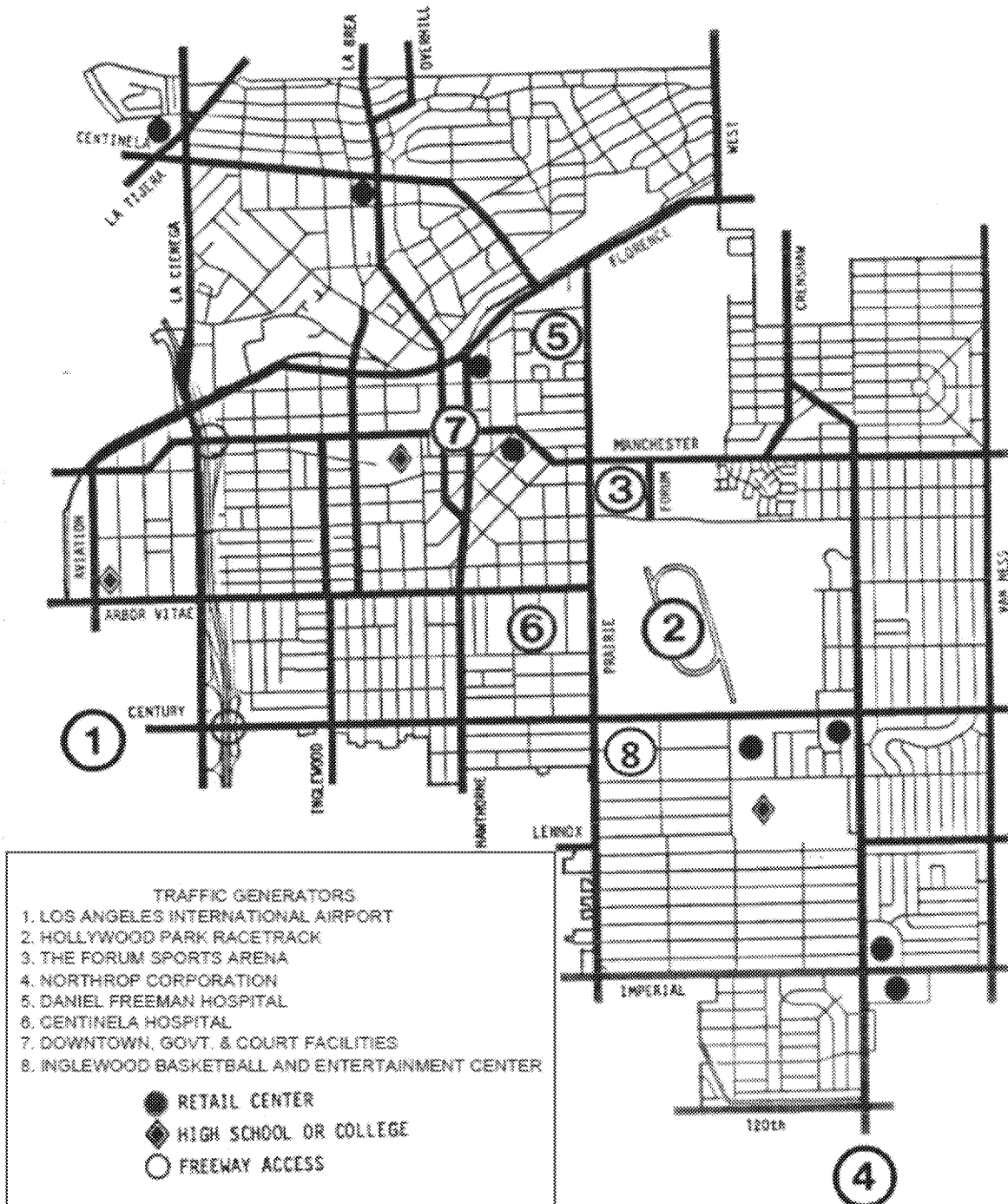
#### Section 1.

The Circulation Element "Street Classification" Map on page 17 is amended in its entirety (as depicted below) to remove the vacated portions of 101st and 102nd Streets as follows:



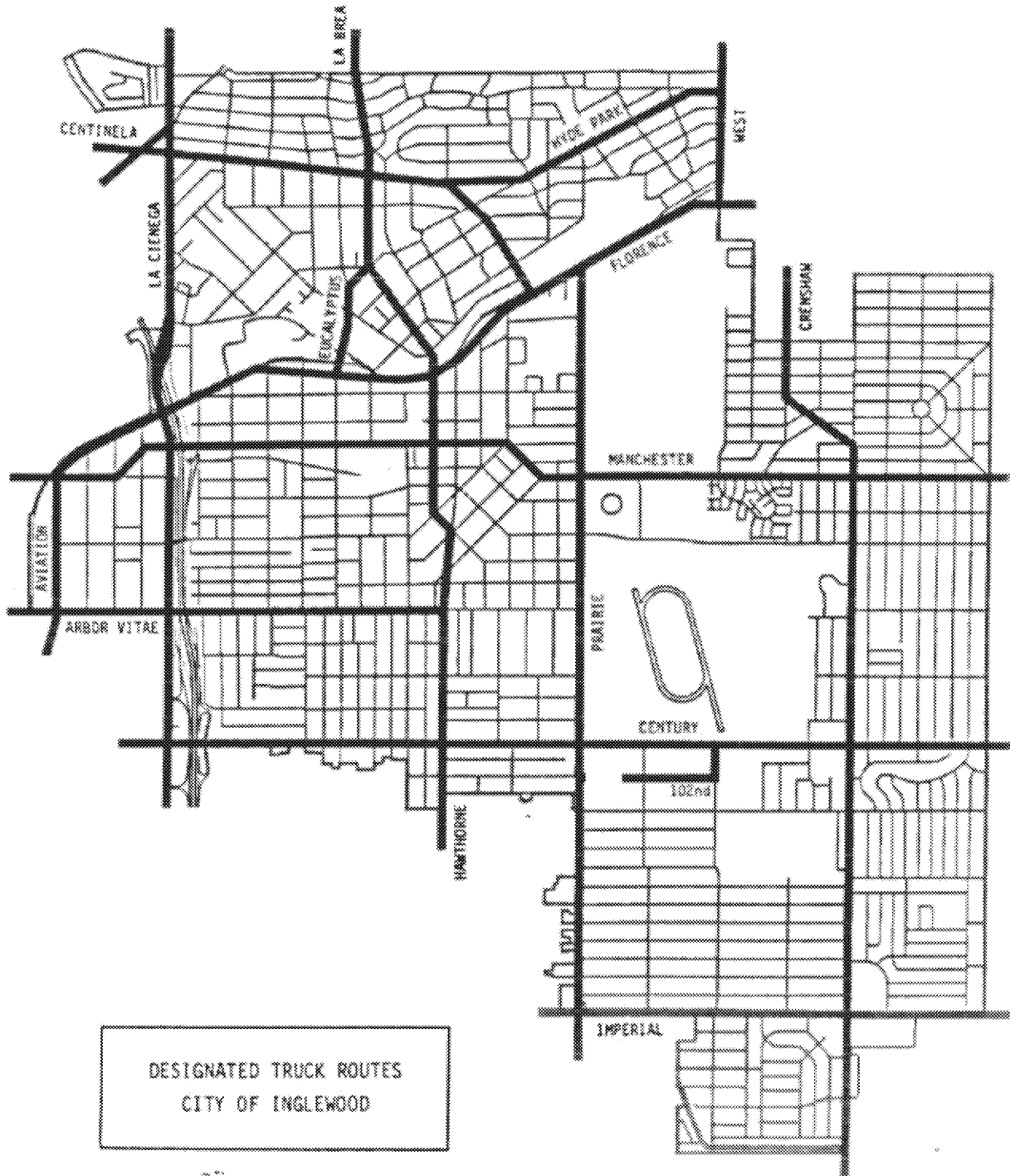
**Section 2.**

The Circulation Element "Traffic Generators" Map on page 23 is amended in its entirety (as depicted below) to add the location of the Project site as follows:



**Section 3.**

The Circulation Element “Designated Truck Routes” Map on page 29 is amended in its entirety (as depicted below) to remove the vacated portion of 102nd Street as follows:



GPA Resolution

Exhibit C-3:

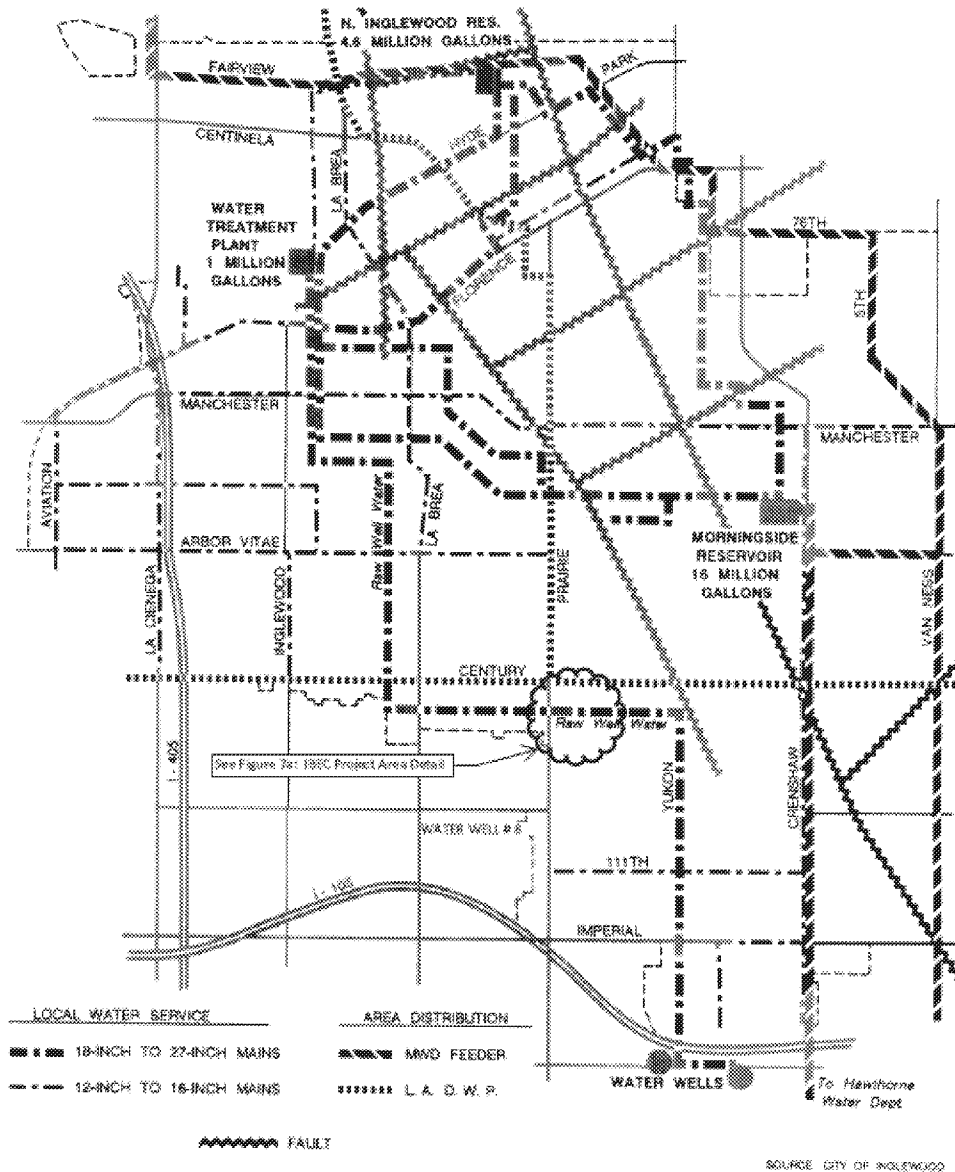
GP Safety Element Map Amendments



## EXHIBIT C-3

### MAP AMENDMENT TO THE SAFETY ELEMENT OF THE INGLEWOOD GENERAL PLAN

Safety Element Water Distribution System Map on page 37 is supplemented (as depicted below) to show the relocation of a water well and accompanying pipelines as follows:



**FIGURE 7. WATER DISTRIBUTION SYSTEM**

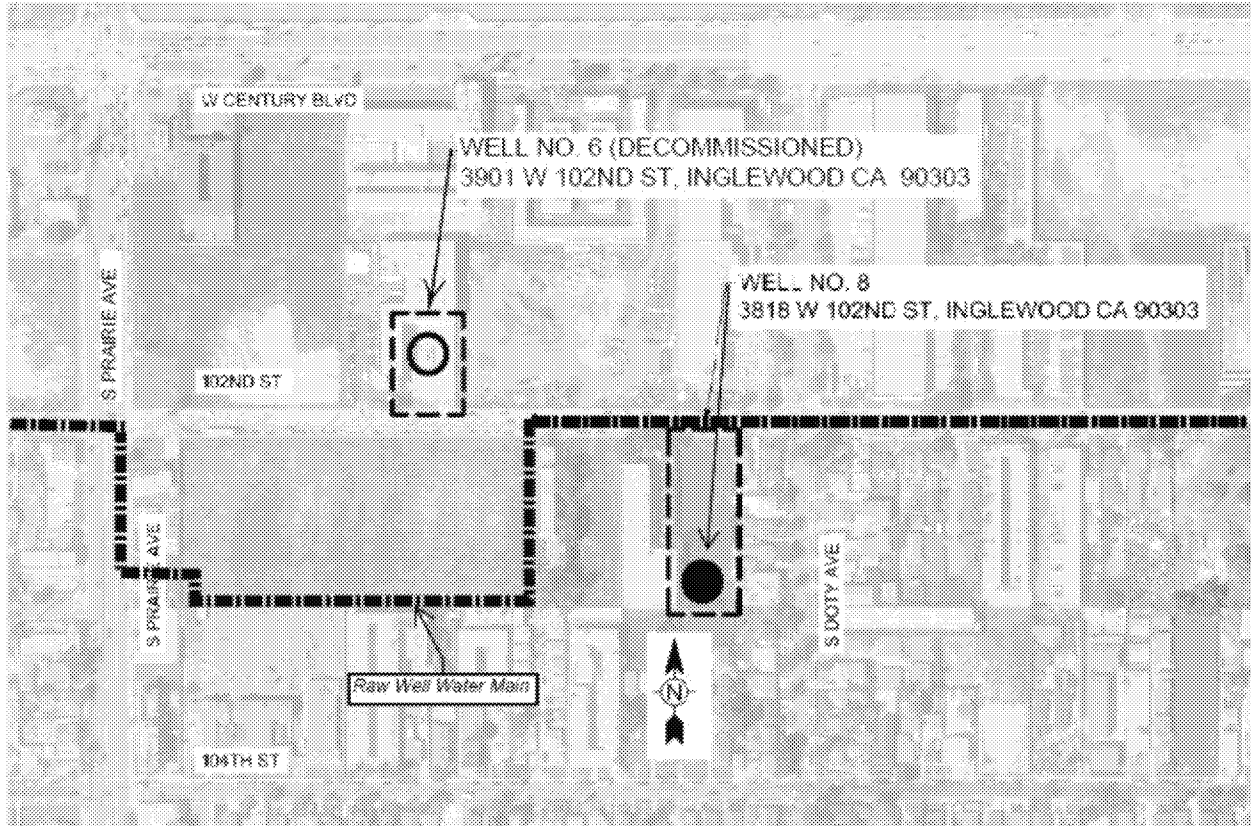


Figure 7a: IBEC Project Area Detail

GPA Resolution  
Exhibit D:  
GP Consistency Findings

## GENERAL PLAN CONSISTENCY FINDINGS

Murphy's Bowl, LLC (Project Sponsor), seeks the development of the Inglewood Basketball and Entertainment Center (IBEC) that includes an arena intended to promote the enjoyment and recreation of the public by providing access to the City's residents in the form of spectator sports, specifically basketball, with up to 18,000 fixed seats to host National Basketball Association (NBA) games, and with up to 500 additional temporary seats for other events such as family shows, concerts, corporate and community events, and other sporting events; an up to 85,000-square foot team practice and athletic training facility; up to 71,000 square feet of LA Clippers office space; an up to 25,000-square foot sports medicine clinic; up to 63,000 square feet of ancillary and related arena uses including retail and dining; an outdoor plaza adjacent to the arena; parking facilities; relocation of a City of Inglewood groundwater well; and various circulation, infrastructure, and other ancillary uses (the Project). The Project also includes a limited-service hotel.

Implementation of the Project requires various approvals from the City, including certain text and map amendments to the General Plan, as more particularly described in Planning Commission Resolution No. 1869 (General Plan Amendments) and City Council Resolution No. \_\_\_\_ (Adopting General Plan Amendments). The City has reviewed the Project, which includes the Approval Actions required for its implementation, as additionally set forth in the CEQA Findings, for consistency with the City's General Plan, as it is proposed to be amended by the General Plan Amendments. Based on this review, and as further described below, the City concludes that the Project and the Approval Actions<sup>1</sup> are each, on balance, consistent with the relevant applicable General Plan policies, goals and objectives of the General Plan, as proposed to be amended. Text proposed by the General Plan Amendments is shown in **bold underline**. Additional detail regarding much of the underlying analysis and evidence is contained in the agenda reports to the City Council and to the Planning Commission, the EIR and all appendices thereto; Planning Commission Resolution No. 1868 (Recommending Certification of the EIR and Adoption of MMRP and CEQA Findings and Statement of Overriding Considerations) including the CEQA Findings and MMRP attached as Exhibit B and C thereto; all plans, drawings, and other materials submitted by the Project Sponsor; minutes, reports, and public testimony and evidence submitted as part of the City Council's duly noticed meeting(s) regarding the IBEC Project; the record of proceedings prepared in connection with AB 987 pursuant to Public Resources Code § 21168.6.8; and all other information contained in the City's administrative record concerning the Project (collectively, the Record). Information in this analysis regarding fiscal and economic data is sourced from the HR&A Report prepared for the Project, which has been peer reviewed by a report prepared by Keyser Marston Associates ("KMA") on behalf of the City. The analysis in the Record has been considered by the City Council, reflects the City Council's independent judgment and analysis, and is incorporated into these findings by reference

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<sup>1</sup> These consistency findings do not include any Approval Actions related to the potential exercise by the City of its eminent domain authority, which is at the City's sole discretion under the terms of the proposed Disposition and Development Agreement for the Project.

## **I. LAND USE ELEMENT**

The Land Use Element presents a long-range plan for the distribution and future use of land within the City. Relevant policies, goals and objectives applicable to the Project are as follows:

### ***General:***

- Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts.
- Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.
- Promote Inglewood's image identity as an independent community within the Los Angeles metropolitan area.

The majority of the Project is designated in the General Plan as Industrial, with a small portion of the site adjacent to S. Prairie Avenue, just south of W. Century Boulevard, designated as Commercial. To implement the Project, amendments are proposed to the Land Use Element to provide a uniform land use designation for the Project site that reflects its proposed uses. This principally involves expressly referencing sports and entertainment facilities and related uses on properties in the Industrial land use designation (see below) and amending the Land Use Map to designate the entire Project site as Industrial. These amendments are further described in the Planning Commission Agenda Report and City Council Agenda Report. Additional amendments are proposed to the Circulation Element and Safety Element, which are discussed in Sections II and VII below.

Historically, the Project site has been challenging to develop and utilize due to its location under the Los Angeles International Airport ("LAX") flight path. Most of the currently vacant parcels comprising the Project site were previously developed, but were purchased by the City and the former Inglewood Redevelopment Agency using FAA-issued noise grants to the City of Inglewood as part of the LAX Noise Control/Land Use Compatibility Program, with the objective of recycling incompatible residential land use to other land uses compatible with the noise levels of airport operations. These parcels were specifically acquired in order to eliminate incompatible residential use in the near term and stimulate economic development in the long term by converting the parcels in this area to noise-compatible commercial, industrial, or other revenue-generating uses. The City has worked for many years to market the property for redevelopment with noise-compatible uses, but these efforts have never come to fruition, other than a portion of the Project site used as a private parking lot from 2013-2017.

The Project provides for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts because as established above, the Project is part of a concerted and longstanding effort to redevelop parcels in the LAX flight path with noise-compatible, productive uses suitable for the recreational enjoyment of the public. The Project's sports and entertainment, retail and restaurants, parking structure and other uses diversify the City's land use and are compatible with and complement other commercial and industrial land uses in the area and the City.

The Project would help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions because it would redevelop the site into a state-of-the-art sports and entertainment facility with related uses that promotes economic development and increases employment opportunities for the City's residents. In addition to redevelopment of vacant and underutilized parcels, the economic development and employment opportunities include but are not limited to the following during the construction period and during subsequent Project operations. 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, and 8% related to business tax on contractor earnings. Construction of the Project will also generate about \$10.3 million from the Project's Art Fee and School fee, which are non-general fund revenues.

Upon stabilized Project operation in 2025, the Project is expected to produce (calculated in 2019 dollars) approximately \$4.5 million in annual net tax revenues, plus \$2.3 million in annual property tax revenue for the Inglewood Unified School District.<sup>2</sup> Cumulatively, it will produce approximately \$70.0 million in net fiscal impact (or \$149.1 million in nominal dollars) plus approximately \$72.4 million in normal property tax revenues.

The fiscal analysis for the Project also included a 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 \$4,000,000, or \$132,000,000 cumulatively in nominal dollars. 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.

During construction, approximately 7,269 total headcount (direct on-site plus multiplier effect) jobs will be created, of which approximately 7,020 will be full-time and part-time construction jobs at the Project site. 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. 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 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.

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<sup>2</sup> 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.

In addition, the Project would provide extraordinary public benefits contained in Exhibit C, attached to the Development Agreement, including creation of local jobs and workforce equity. For example, as set forth in Exhibit C to the Development Agreement, the Project must comply with certain steps with the goal of hiring qualified Inglewood residents for no less than 35% of the employment positions needed in connection with the event operations at the Arena. In addition, the Development Agreement contains goals for significant participation by minority/disadvantaged business enterprises and related local hire provisions, along with job fairs, a workforce outreach coordination program, contributions to job training programs for Inglewood residents, and good faith efforts to lease at least one restaurant space to a qualified Inglewood business for at least one year. Additional public benefits include commitments to affordable housing and renter support, rehabilitation of Inglewood Public Library and creation of a community center, support for Inglewood youth, education, support for Inglewood seniors, improving Inglewood parks, and sustainable construction practices and eco-friendly building operations.

The Project promotes the City's image and identity as an independent community within the Los Angeles metropolitan area by facilitating the return of an NBA franchise to the City known as the "City of Champions." The Project promotes the City's image and identity as a premier regional sports and entertainment center at the regional, national, and international level and complements the adjacent new development at Hollywood Park, including its National Football League stadium, creating a world-class sports and entertainment district for the recreational enjoyment of the public.

***Residential:***

- Foster the revitalization or, if necessary, the recycling of residential areas which cannot provide a decent living environment because of jet noise impact.

The Project site does not include parcels with a residential land use designation under the General Plan, and no residential uses are proposed in connection with the Project. However, because the General Plan includes policies, such as the above residential policy, that are not explicitly limited to development within the residential land use designation, analysis of this policy has been included for completeness. The General Plan and Los Angeles County Airport Land Use Compatibility Plan both establish that the area in which the Project site is located is not appropriate for the development or redevelopment of residential uses given its location under the Los Angeles International Airport Flight Path. The Project does not include residential uses, nor does it directly impact housing stock. Rather, the Project facilitates development of sports and entertainment facilities and related uses, which are compatible land uses within the noise impacted area, and are consistent with the FAA-issued noise grants, as further discussed in the letter to the City dated August 26, 2019, from Mr. David Cushing, Manager of the FAA's Los Angeles Airport District Office.

As noted above, the majority of parcels comprising the Project site were purchased by the City and the former Inglewood Redevelopment Agency utilizing FAA-issued noise grants for the specific purpose of recycling incompatible residential land use to land uses which are compatible

with the noise levels of LAX airport operations. These parcels were specifically acquired in order to eliminate incompatible residential uses in the near term and stimulate economic development in the long term by converting the parcels in this area to noise-compatible commercial, industrial, or other revenue-generating uses. The Project meets these objectives by developing sports and entertainment facilities and related uses that are consistent with the FAA-issued noise grants. Accordingly, and for reasons more fully stated in the Los Angeles County Airport Land Use Commission findings and order, all of which are incorporated herein by reference, the Project (expressly including an arena for sports and entertainment uses, athletic practice and training facility, office space for the NBA team, sports medicine clinic, retail/commercial uses, community space, parking, hotel signage and relocation of a municipal water well) is fully consistent with the Los Angeles County Airport Land Use Plan.

*Commercial:*

- Create and maintain a healthy economic condition within the present business community and assist new business to locate within the city.
- Continue to promote the development of high quality commercial/office space at appropriate locations within the city through the redevelopment process.
- Promote the development of commercial/recreational uses which will complement those which already are located in Inglewood.

As discussed above, the majority of the Project site is designated under the General Plan as Industrial, with a small portion of the site designated as Commercial. The General Plan Amendments propose to apply a uniform Industrial land use designation for the Project site. Because the General Plan includes policies, such as the above commercial policies, that are not explicitly limited to development within the commercial land use designation, analysis of these policies has been included for completeness.

The Project would maintain a healthy economic condition within the present business community and assist new business to locate within the City as follows. The Project supports the City's economic growth by contributing to the City's financial base and overall fiscal stability based on increased City revenue (including property, construction, sales, and admissions taxes) generated by the Project. The Project would stimulate new businesses and create new employment opportunities for the City's residents, including but not limited to new construction jobs and permanent jobs for annual Project operations (including non-event jobs and full-time equivalent event-related jobs), all as discussed in the HR&A Report and the Keyser Marston Peer Review Report as summarized above. As described above, the Project would provide extraordinary public benefits contained in Exhibit C, attached to the Development Agreement, including the creation of local jobs and workforce equity.

The Project would redevelop a largely vacant and underutilized area with high-quality commercial uses, including a sports arena, retail, and office space, in a transit-accessible area appropriate for those uses, which would complement existing commercial/recreational uses already located in Inglewood, including the adjacent mixed-use Hollywood Park development. The Project would improve the existing visual appearance of the Project site, including its



frontage along West Century Boulevard and South Prairie Avenue, which currently is characterized by underutilized and largely vacant parcels. The Project would be required to comply with project-specific design guidelines, and would comply with a plan review process to ensure that the Project's new development is visually compatible with and complementary to its site and surroundings. As further described below, the Project will provide transportation infrastructure and utilities improvements required to serve the Project.

***Industrial:***

- Provide a diversified industrial base for the City. Continue to improve the existing industrial districts by upgrading the necessary infrastructure and by eliminating incompatible and/or blighted uses through the redevelopment process.
- Continue the redevelopment of Inglewood by promoting the expansion of existing industrial firms and actively seek addition of new firms that are environmentally non-polluting.
- Increase the industrial employment opportunities for the City's residents.
- **[As Proposed to Be Amended] Promote the development of sports and entertainment facilities and related uses on underutilized land, in appropriate locations, creating economic development and employment opportunities for the City's residents.**

With adoption of the proposed General Plan amendments, the entire Project site is designed as Industrial under the General Plan Land Use map. (Prior to adoption of the proposed General Plan amendments, the majority of the Project site was designated Industrial and a small portion of the Project site along the South Prairie Avenue corridor was designated as Commercial.) The General Plan amendments would allow for development of sports and entertainment facilities and related uses within the Industrial land use designation on land that is currently underutilized and historically has been challenging to develop, thereby assisting in eliminating incompatible uses, as discussed above and, further diversifying the industrial and employment base, as discussed above. In addition, it would improve existing and create new infrastructure for water, wastewater, drainage, electricity, natural gas and telecommunication services. It would also include many improvements to transportation infrastructure such as restriping, converting medians to turn lanes, widening of freeway off-ramps, and signal timing improvements through the Citywide ITS program, that serve the broader area, all as reflected in the MMRP. The Project incorporates new uses that support the economic development and employment goals of the General Plan and adds employment opportunities for the City's residents, as discussed above.

The Project is consistent with the General Plan's policy of promoting the addition of new uses that are environmentally non-polluting. The Project will be designed and constructed to meet the US Green Building Council's Leadership in Energy and Environmental Design (LEED®) Gold Certification requirements. The Project will also implement a wide range of mitigation measures intended to reduce or eliminate environmental impacts associated with Project construction and operation, including commitments to a comprehensive Transportation

Demand Management program and meeting a net-zero greenhouse gas standard, as reflected in the MMRP.

On May 6, 2020, the Planning Commission recommended certain General Plan Amendments (GPA 2020-002) to amend the Land Use Element to clarify existing population density and building intensity allowances for all land use designations and on June 30, 2020, the City Council adopted these amendments. The Project is consistent with the Land Use Element policies regarding building intensity allowance applicable to the Industrial designation. Those separate and independent General Plan Amendments merely clarified and expressly quantified pre-existing (and already binding) population density and building intensity allowances for all land use designations by incorporating those population density and building intensity standards from the City's prior existing applicable laws and regulations. Accordingly, those amendments do not alter the Project's consistency with the General Plan Land Use Element, and the Project is consistent with the City's General Plan Land Use Element, both as the General Plan existed prior to the June 30, 2020 amendments and as the General Plan now exists following the June 30, 2020 Amendments. Building intensity, also expressed as "Building Area Ratio" under the General Plan Amendments (GPA 2020-002), refers to the total building floor area divided by the site area and is the standard utilized for commercial, industrial and public/quasi-public uses. The Building Area Ratio applicable to areas designated as Industrial under the General Plan is 13.18:1 or otherwise stated as 1380 percent. The Project would comply with this permitted Building Area Ratio as it would include development of approximately 2,789,000 square feet on the approximately 28.1-acre Project site, which includes approximate Building Area Ratios of 196 percent on the Arena site; 468 percent on the West Parking site; 104 percent on the East Transportation and Hotel site; and zero percent on the Well Relocation site.

***Circulation:***

- Ensure that proposed new uses can be accommodated by adequate and safe streets.
- Promote and support adequate public transportation within the city and the region.
- Develop modified traffic systems that will discourage through traffic from utilizing neighborhood streets.
- Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

The Project would be located at the intersection of South Prairie Avenue and West Century Boulevard, which are both designated as major arterials in the General Plan. South Prairie Avenue runs north/south along the project frontage, and provides two travel lanes in each direction north of Manchester Boulevard, and three travel lanes in each direction south of Manchester Boulevard. West Century Boulevard runs east/west adjacent to the Project site, providing three travel lanes in each direction with a center turn lane. Other major arterials in the vicinity that would serve the Project are La Brea Avenue, Hawthorne Boulevard, Crenshaw Boulevard, and Manchester Boulevard. The EIR includes a comprehensive transportation analysis that considers net new traffic projected to be generated by the Project under a large

number of scenarios at various times of the day and days of the week, both with and without special events, and including concurrent event scenarios with the Forum and Hollywood Park.

The EIR also identifies various measures that will be implemented to reduce or avoid Project impacts related to transportation and circulation, which have been included in the MMRP adopted with Project approval. These include implementation of an Event Transportation Management Plan, a management and operating plan intended to manage high levels of traffic on streets in the vicinity of the Project, and other area parking garages and key travel corridors in order to facilitate adequate and safe street access to and from the Project site. The Event TMP includes a Neighborhood Traffic Management Plan that includes goals and requirements for reducing traffic volumes on local and collector street segments, and discouraging and reducing event-related cut-through traffic while maintaining access for residents, adequate and safe streets, and discouraging through traffic from utilizing neighborhood streets.

Physical improvements include restriping, converting medians to turn lanes, widening of streets and freeway off-ramps, and signal timing improvements. The Project would also include implementation of several transportation management plans, including: a Construction Traffic Management Plan to ensure that acceptable operating conditions on local roadways are maintained during Project construction; a comprehensive TDM program that includes strategies to reduce vehicle trips and encourage other modes of travel; and a Local Hospital Access Plan to ensure that safe and timely routes to the hospital are provided in all pre- and post-event scenarios, all as reflected in the MMRP.

The Project includes various strategies to promote and support the use of public transportation as a means of travel to and from the Project through several measures, including a transportation hub at the East Transportation and Hotel site, shuttle stops on South Prairie Avenue, and a shuttle system for large events that would connect the Project to nearby Metro Crenshaw and Green Line Rail Stations. There are currently eight bus stops located on streets and sidewalks adjacent to the Project site. The TDM programs will include bus stop facilities improvements, such as providing on-site and/or off-site improvements such as lighting, new benches and overhead canopies, adding bench capacity if needed, and real-time arrival information. The Project would exceed the requirements of the City of Inglewood Municipal Code for the provision of short- and long-term bicycle parking.

As reflected in the MMRP, the TDM Program will also implement an extensive range of programs intended to encourage use of alternate modes of transportation including public transit, shuttles, ridesharing, walking, and biking, including but not limited to: programs to encourage use of alternative mode of transportation, such as integrated event and transit tickets, bus facility improvements, employee transit or vanpool subsidies; event-day dedicated shuttle services to provide connections with short wait-times from the Project to existing and future LA Metro Green Line and Crenshaw Line stations; programs to encourage use of carpools and vanpools, including incentives like preferential parking, reduced parking cost, and variable parking pricing based on vehicle occupancy; programs to encourage active transportation, such as biking and walking, including bicycle parking, showers and lockers for employees, bike valet, and improved sidewalks and pathways to create safe routes throughout the Project site; a Park-n-Ride program

that would use chartered buses to connect the Project to park-n-ride parking lots at key locations around the region; information services to inform the public about alternative ways to travel to and from the Project site; and event-day local microtransit service for a limited number of employees and attendees that would provide a microbus with a service range of 6 miles around the Project site.

The Project also includes streetscape and pedestrian circulation system improvements that will increase walkability and improve the pedestrian and bicyclist experience and accessibility for all users including those with disabilities that impair mobility, on adjacent public rights of way near the Project site. The Project will include illumination to highlight circulation path and landscape features, and to create a safe pedestrian experience. To reduce impacts related to new sources of substantial light or glare, the Project is required to implement a Lighting Design Plan approved by the City, as reflected in the MMRP. These improvements would all be constructed to current accessibility standards.

The Project's consistency with the goals and policies of the General Plan related to circulation is further discussed in EIR Section 3.14, Transportation and Circulation, as is incorporated herein by reference. The analysis identifies a required amendment to the map on page 17 of the Circulation Element and the text on page 21 of the Circulation Element (proposed as part of the Project; see Section II CIRCULATION ELEMENT discussion below), and otherwise does not identify any inconsistencies with General Plan policies related to circulation.

*Community Facilities:*

- Maintain the present high level of police and fire services as fiscally prudent.
- Expand opportunities for cultural and social growth for the City's residents.

Analysis in Chapter 3.13 of the EIR establishes that the City will be able to maintain the present high level of police and fire services with the Project. As discussed in greater detail in the EIR, fire protection would be provided by the Los Angeles County Fire Department (LACFD) which provides protection services on a regional basis from a multitude of fire stations, the closest of which are Stations 170, 18, and 173, located within 1.5 miles of the Project site, and four additional fire stations located within 2.5 miles of the Project site. While the Project will increase call volumes to the LACFD, sufficient capacity exists among the stations in the vicinity to meet the increased demand. According to the LACFD, the estimated average response time to the Project site from Fire Station 170, the first due-in station, is five minutes, which meets the response time guidelines of the LACFD. Further, the Project will generate revenue for the City's general fund that could be used to fund LACFD expenditures as necessary to offset incremental Project effects on fire protection manpower or equipment.

The City of Inglewood Police Department will provide police protection at the Project site. As explained in the EIR, according to the Inglewood Police Department, because of the Department's long history of providing service to major entertainment and sports events in Inglewood, no new facilities or personnel would be required to provide service to the Project.

As further discussed in Section I above regarding general policies under the Land Use Element, the Project would expand opportunities for cultural and social growth for the City's residents by developing a premier regional sports and entertainment center in an area that is currently underutilized and historically has been challenging to develop. The Project complements the adjacent new development at Hollywood Park, including its National Football League stadium, creating a world-class sports and entertainment district. In addition to sporting activities, it is anticipated that the Project may be utilized to host other events such as family shows, concerts, corporate and community events, and other sporting events, all of which would provide cultural and social opportunities for the City's residents. Pursuant to the terms of the Development Agreement, the Project will provide for community use of the Arena for up to 10 days per calendar year, and will dedicate to community groups an average of 100 free general admission tickets to every regular season LA Clippers game.

The Project's consistency with the goals and policies of the General Plan related to community facilities is further discussed in EIR Section 3.13, Public Services. The analysis does not identify any inconsistencies with the policies related to public services in either the Land Use Element or Safety Element (discussed below).

### ***Summary Regarding Land Use Element Consistency***

In addition to the foregoing, EIR Section 3.10, Land Use and Planning, identified potentially applicable General Plan Policies, and concluded that the Project would be consistent with the Land Use Element goals and objectives of the General Plan, as proposed to be amended.

For the foregoing reasons, the Project is consistent with the Land Use Element, as proposed to be amended.

## **II. CIRCULATION ELEMENT**

The Circulation Element is designed to require that adequate street access and traffic capacity is considered for current and future land use needs. There are three broad themes running throughout the Circulation Element: (1) presenting and analyzing the existing circulation plan, (2) disclosing additional modes of transportation, and (3) evaluating Inglewood's existing street environment and its possible enhancements (such as street widening and intersection alignments). The Circulation Element states that the circulation program presented therein is "not intended to be exhaustive or inflexible; it should be continually evaluated to determine its currentness and potential for addressing the circulation and transportation needs of this community." Certain policies related to circulation are provided in the Land Use Element, as set forth above; the consistency analysis below pertains to the content in the Circulation Element itself.

In order to implement the Project, minor amendments to the Circulation Element are proposed to revise certain maps and corresponding text to reflect the Project. The conforming amendments to the Circulation Element include minor text amendments to the "Street Classification" Map, "Traffic Generators" Map, and "Designated Truck Routes" Map to account for the Project, including to reflect the vacated portion of 101st and 102<sup>nd</sup> streets. These

amendments are further described in the Planning Commission Agenda Report. On balance, the Project is consistent with the policies, goals and objectives of the Circulation Element, as it is proposed to be amended.

As described under the analysis in Section I above related to circulation, the Project would generate additional traffic, particularly during pre- and post-event scenarios hosted at the Project site. To address potential impacts from this additional traffic, the Project would incorporate various circulation improvements around the Project site vicinity and would also include implementation of several transportation management plans, including: a comprehensive TDM program, Event Transportation Management Plan, a Construction Transportation Management Plan, and a Local Hospital Access Plan, all as reflected in the MMRP.

As discussed in Section 2.5.6 of the EIR, the Project proposes to vacate: (i) a portion of West 101<sup>st</sup> Street west of South Prairie Avenue, and (ii) a portion of West 102<sup>nd</sup> Street between South Prairie Avenue and South Doty Avenue, which would become part of the Project site. These street vacation proceedings would be carried out at the City's sole discretion, and would require a determination that the proposed street vacation segments are not necessary for present or prospective public use. This vacation would be subject to various conditions including construction of new or relocated facilities that would replace in-place utilities that serve off-site properties. To allow for Project site circulation, new site access roads would be developed. The proposed street vacation required for implementation of the Project would not adversely impact the City's circulation pattern. All other properties that are immediately adjacent to the street vacation areas would continue to have alternative, convenient pedestrian and vehicle access, including access to and from the non-vacated portions of the vacated street segments. While pedestrians and drivers would no longer have access to these vacated street segments, they could use convenient alternate routes, and these street vacations would not disrupt the City's overall circulation pattern because numerous alternative routes in the nearby vicinity are available. (See EIR p. 3.14-65 to 66, and 3.14-250)

Additionally, development of the West Parking Garage site portion of the Project site would require removal of the existing crosswalk on the north side of the South Prairie Avenue and West 102<sup>nd</sup> Street intersection, which would be relocated with a replacement crosswalk immediately south of the garage entrance/exit. Removal of this crosswalk would not create a physical barrier or obstacle to circulation that would restrict existing patterns of movement between the Project site and the surrounding neighborhoods because pedestrians could use the relocated crosswalk to cross South Prairie Avenue, walk two blocks south to the crosswalk at the South Prairie Avenue 104<sup>th</sup> Street intersections, or walk one block north to use the crosswalk located at the South Prairie Avenue and West Century Boulevard intersection. The proposed relocation of the crosswalk across South Prairie Avenue would not adversely impact the City's pedestrian circulation given the availability of nearby alternative routes. The Project also proposes to construct pedestrian bridges from certain portions of the Project site crossing (i) South Prairie Avenue and (ii) Century Boulevard to enhance public pedestrian circulation and safety.

The EIR analyzes the transportation and circulation impacts related to any potential street vacations, crosswalk relocations, pedestrian bridges, and implementation of various circulation

improvements. The conforming amendments to the various Circulation Element Maps account for these modifications to the extent necessary; the Project is consistent with the circulation patterns reflected in the Circulation Element, as proposed to be amended.

The Project's consistency with the Circulation Element and Land Use Element Policies related to circulation is further discussed in EIR section 3.14, Transportation and Circulation. The analysis concludes that the Project would not be inconsistent with the Circulation Element, as proposed to be amended.

For the foregoing reasons, the Project is consistent with the Circulation Element, as proposed to be amended.

### **III. CONSERVATION ELEMENT**

The Conservation Element address the plan for conservation, development and utilization of natural resources found within the jurisdiction of the City. Relevant policies, goals and objectives applicable to the proposed Project are as follows:

- Protect aquifers and water sources (which includes prevention of contamination of ground water by surface contaminations leaching into the soil).
- Reduce the ever-increasing demand being placed on the aquifers and on the statewide water sources.
- Implement National Pollutant Discharge Elimination System (NPDES) requirements applicable to the City.
- Require periodic sweeping to remove oil, grease and debris from parking lots of 25 spaces or more.

As discussed in EIR Chapter 3.9, the Project is required to comply with federal, state, and local regulations and will implement Best Management Practices (BMPs) to reduce erosion and runoff to protect aquifer and water resources. The Project is also required to comply with the NPDES General Construction Permit and related Inglewood Municipal Code regulations, which prevent the substantial degradation of water quality during construction of the Project.

The Project is also required to comply with various regulations protecting water quality, including the MS4 permit, the County's LID Standards Manual, and the City's LID Requirements during operations, all of which implement BMPs and stormwater quality control measures to reduce pollutants in stormwater discharges and improve water quality, preventing the contamination of groundwater. As reflected in the MMRP, the Project is required to prepare a Project-specific LID Report to reduce the volume of stormwater runoff and potential pollutants in stormwater runoff at the Project site. The Project will protect groundwater quality through implementation of site design, source control and treatment control design features prior to discharge of runoff into the groundwater. The Project would incorporate a bio-filtration system in landscaped areas throughout the Project site to capture site runoff from roof drains, treat the

runoff through biological reactions within the planter soil media, and discharge at a rate intended to mimic pre-developed conditions.

The Project will not interfere with groundwater recharge or demand being placed on aquifers. Due to the development associated with the Project, it is estimated that approximately 90 percent of the Project site would be covered by impervious surfaces. However, because the existing condition of the Project site is developed with impervious surfaces that have a low infiltration and groundwater recharge or are impervious surfaces, the net change of groundwater recharge at the Project site would be negligible.

The Project will include a number of indoor and outdoor enhanced water conservation and water reuse measures based on the requirements established for the LEED® Gold Certification. The Project is designed to include other water conservation measures such as installation of low-water landscaping materials; use of recycled water for landscaping purposes; use of water efficient fixtures and equipment; and installation of a specialized cooling tower system that is equipped with water-efficient technologies.

As discussed in EIR Chapter 3.15, with respect to access to water supply for the Project, as reported in the Golden State Water Company's (GSWC) 2015 Urban Water Management Plan, water usage per capita within its Southwest System service area in which the Project is located has declined notably over the last decade due to a combination of factors including tiered water pricing, increasing water conservation regulations, the extended drought, and the recession. This documented reduction in per capita water use, combined with GSWC's commitment to continued water conservation efforts and compliance with relevant State requirements, as well as efforts by West Basin Municipal Water District to increase recycled water use, further reinforce that both the Project and water service within GSWC's Southwest System are in alignment with the City's policy regarding water demand management and that the Project will not increase demand being placed on the aquifer and on statewide water sources in a manner inconsistent with the General Plan.

As part of the Project, the existing Inglewood Water Well #6 will be decommissioned in compliance with federal, state, and local standards and replaced with a new Water Well #8 within the Well Relocation site, which consists of two parcels south of West 102<sup>nd</sup> Street and west of South Doty Avenue, within the Project site. While the new Water Well #8 would have increased capacity as compared to Water Well #6, because the net change in groundwater recharge would be negligible with implementation of the Project, use of new Water Well #8 will not result in substantial depletion of groundwater supplies.

Lastly, the Project will implement periodic sweeping of parking lots to remove oil, grease, and debris from parking lots of 25 spaces or more, as reflected in the MMRP.

The Project's consistency with the goals and policies of the Conservation Element is discussed in various sections of the EIR, including Section 3.2, Air Quality; 3.3, Biological Resources; 3.9, Hydrology and Water Quality; and 3.15, Utilities and Service Systems. The EIR concludes that the Project is not inconsistent with these goals and Policies.



For the Foregoing reasons, the Project is consistent with the Conservation Element.

#### **IV. HOUSING ELEMENT**

The General Plan Housing Element 2013-2021, adopted on January 28, 2014, presents a framework for City implementation of a comprehensive housing program from 2013 to 2021 to facilitate decent and affordable housing for its residents. The Housing Element establishes policies to create or preserve quality residential neighborhoods. The Housing Element identifies current and future housing needs and establishes policies and programs to mitigate or correct housing deficiencies.

As further discussed in Section I above, the Project site currently does not include any housing, and does not include any sites identified in the Housing Element for housing. The General Plan Land Use Element states that the area in the City generally bounded by Crenshaw Boulevard on the east, La Cienega Boulevard on the west, Century Boulevard on the north and 104<sup>th</sup> Street on the south, in which the Project site is located, is “an extremely undesirable location for residential usage because it is severely impacted by jet aircraft noise.” As described above, most of currently vacant parcels comprising the Project site were purchased by the City and the former Inglewood Redevelopment Agency using FAA-issued noise grants to the City of Inglewood as part of the LAX Noise Control/Land Use Compatibility Program, with the objective of recycling incompatible residential land use to other commercial land use compatible with the noise levels of airport operations. As further discussed in the letter to the City dated August 26, 2019, from Mr. Davis Cushing, Manager of the FAA’s Los Angeles Airport District Office, the FAA does not support the reintroduction of residential uses on these type of noise-impacted parcels.

The Project does not propose the development of housing, and would not impact existing housing stock. The Project includes a number of community benefit commitments designed to further general goals of the City regarding housing, including funding for affordable housing, first time homebuyers assistance, support for rental and anti-eviction services, and capacity building for housing-focused non-profits.

The goals and policies of the Housing Element are further discussed in EIR Section 3.12, Population, Employment, and Housing. The analysis concludes that because the Project site does not include housing and is not identified as a site for housing within the Housing Element, the goals and policies identified in the Housing Element are not applicable to the Project.

For the foregoing reasons, the Project is consistent with the Housing Element.

#### **V. NOISE ELEMENT**

The Noise Element is designed to manage noise within the City and to protect sensitive uses from excessive noise-related impacts. Relevant policies, goals and objectives applicable to the proposed Project are as follows:

- Goal 1: Provide for the reduction of noise where the noise environment represents a threat to public health and welfare.
- Goal 2: Reduce noise impacts in degraded areas.
- Goal 3: Protect and maintain those areas having acceptable noise environments.
- Goal 4: Provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions.
- Policy 4.1: Provide for measures to reduce noise impacts from traffic noise sources
  - Construct barriers to mitigate sound emissions where necessary or where feasible.
  - Reduce transportation noise through proper design and coordination of routing.
- Policy 4.2: Incorporate noise considerations into land use planning decisions.
  - Ensure acceptable noise levels near schools, hospitals, convalescent homes, and other noise sensitive areas.
  - Encourage acoustical design in new construction.
- Policy 4.3: Develop measures to control non-transportation noise impacts.
  - Evaluate noise generated by construction activities.
- Policy 4.4: Reduce Noise Conflicts at the Source.
  - Actively support the FAR Part 150 Noise Compatibility Program as described in the “Noise Control and Land Use Compatibility Study, Los Angeles International Airport.” (March 1984).
  - Provide quick response to complaints and rapid abatement of noise nuisance within the scope of the City’s police powers.
- Policy 4.5: Reduce noise conflicts at the receiver.
  - Encourage a long term development pattern which minimizes noise conflicts through planning and zoning.
  - Use redevelopment powers where appropriate and feasible to convert most seriously noise-impacted areas to less noise sensitive uses, as identified in the Noise Compatibility Program.
- Policy 4.6: Protect those who live and work in the City from dangerous on-the-job noise exposure.

Chapter 3.11 of the EIR contains a comprehensive analysis of the existing noise setting, and the Project’s potential impacts from both construction and operational noise, including from Project-related traffic, including various objective standards and measures of measurement to allow consideration of community noise levels as part of the deliberation regarding Project approvals. While the Project will generate temporary noise related to construction and permanent intermittent traffic and operational noise that would increase ambient noise levels in the Project vicinity, in some cases resulting in significant, unavoidable impacts, operation of the Project would not result in inconsistencies with the goal and policies of the Noise Element.

With respect to Goal 1 and Goal 2, the General Plan indicates that the area generally bounded by Crenshaw Boulevard on the east, La Cienega Boulevard on the west, Century Boulevard on the north, and 104<sup>th</sup> Street on the south should be designated as Industrial from the present residential and commercial, and that the site on which the Project is located should be utilized for

industrial uses given the impact of airport related noise on that area. (See General Plan, Land Use Element, p;72.) The Project includes land uses that would be appropriate given the surrounding ambient noise environment consistent with the General Plan. As discussed above in Section I, the City and the former Inglewood Redevelopment Agency used FAA and Los Angeles World Airports grant funding as part of a noise-mitigation program to acquire approximately 60 of the 65 City- and former Inglewood Redevelopment Agency (now replaced by the “City of Inglewood as Successor Agency to the Inglewood Redevelopment Agency”)-owned parcels within the Project site in order to eliminate incompatible residential uses in the near term by converting this area to noise-compatible commercial, industrial, or other revenue-generating uses. The Project is consistent with this goal because it would develop noise-compatible uses consistent with the purpose of FAA and Los Angeles World Airport grant funding. As further described in the EIR, the Project will comply with all standard building construction practices and will comply with applicable building codes for the commercial structures that would typically reduce interior noise levels to acceptable levels. Among other applicable standards, the California Green Building Standards Code (Title 24) sets forth specific noise reducing transmission standards for non-residential structures. Implementation and compliance with these requirements will be accomplished through the design process and verified in the building inspection process.

The policy initiatives expressed in Goals 1 and 2, in addition to addressing the siting of new facilities, also focus on the reduction of noise levels. In response to these policy initiatives, the Project incorporates a comprehensive program of noise reduction features that consist of Project elements and mitigation measures that would reduce potential temporary noise impacts related to construction and intermittent operational noise, particularly to sensitive receptors. Further, these Projects elements and mitigation measures have been designed to address noise near the on-site sources, which is the most effective way of reducing Project-related off-site noise levels. Accordingly, the Project implements the policy initiatives of Goal 1 and 2, and is therefore consistent with Goals 1 and 2, by reducing potential Project-related noise impacts that would otherwise occur without implementation of the Project’s comprehensive noise reduction program.

As to Goal 3, as further described in detail below, the Project is consistent with Goal 3 as it would incorporate a number of project-design features and mitigation measures that would reduce potential temporary noise impacts related to construction and intermittent operational noise, particularly to sensitive receptors.

With respect to Goal 4, the EIR incorporates robust analysis of the existing ambient community noise levels and evaluates the estimated future noise and vibrations levels at surrounding noise- and vibration-sensitive land use resulting from construction and operation of the Project to identify the potential for significant impacts and associated mitigation measures, if required. This information has been presented to and will be taken into consideration by decisionmakers.

As reflected in the MMRP, the Project will implement measures to reduce noise impacts from traffic noise sources, including a comprehensive TDM program that would reduce Project-

related traffic, resulting in a reduction a reduction in traffic noise. The Project will also implement a Construction Traffic Management Plan that would address construction traffic noise impacts in areas surrounding the Project site, by: prohibiting construction trucks from traveling on local streets; restricting the time of day of truck arrivals and departures; and restricting the size and type of trucks permitted.

The Project incorporates a range of design elements and mitigation measures, reflected in the MMRP, to control non-transportation noise impacts. These design elements and mitigation measures, as components of the Project's comprehensive noise reduction program, address both Project construction and operation. With respect to construction noise, construction noise levels generally vary considerably over the Project's short-term construction period and would cease to occur once Project construction is completed. As such, Project construction would affect noise sensitive receptors for varying durations and at varying levels over the course of Project construction (i.e., not every noise receptor would be impacted equally and would not be impacted for the entirety of Project construction). A key component of the Project's construction noise reduction program is the use of sound barriers that reduce off-site noise levels during Project construction and operation. Sound barriers would reduce construction noise in the following three ways. First, the Project includes the utilization of temporary noise walls at various locations on the Project site during construction. Second, the Project includes the placement of buildings that would be located between the arena building, by far the largest proposed on-site structure, and off-site noise receptors. As a result, these buildings would act as a sound barrier for off-site noise between an on-site construction area and off-site noise receptor. Third, the outer shell of each building once completed would act as a sound barrier for all construction that would occur inside of the buildings' outer shell. Project construction, in addition to the use of sound barriers to reduce Project construction noise levels, would include the use of "quiet" pile driving technology (such as auger displacement installation) rather than the use of driven piles for foundation support. To further manage construction noise, the Project will implement a Construction Noise Reduction Plan to minimize daytime and nighttime construction noise at nearby noise sensitive receptors. During construction activities, the Project will include designation of a Community Affairs Liaison who will be responsible for promptly responding to any local complaints about construction activities. The Project will also implement a Construction Traffic Management Plan that will address construction traffic noise impacts in areas surrounding the Project site by: prohibiting construction trucks from traveling on local streets; restricting the time of day of truck arrivals and departures; and restricting the size and type of trucks permitted.

With respect to non-transportation operational noise, the Project incorporates several strategies and mitigation measures to reduce noise from Project operations. For example, the Project operational noise levels would be reduced through the use of permanent sound barriers at various locations on the Project site, as well as the placement of buildings along the perimeter of the Project site that would be located between certain on-site noise sources and off-site noise receptors resulting in a sound barrier effect for those off-site noise receptors within line-of-site of an on-site activity area. (See EIR pages 3.11-70 and 3.11-143). To further reduce Project

operational noise levels, the Project also will implement an Operations Noise Reduction Plan for major event pre- and post-event conditions.

The EIR for the Project analyzes the 14 CFR Part 150 noise contours and evaluates the compatibility of the Project's proposed land use with those noise contour. The Airport Land Use Plan Land Use Compatibility Chart is depicted in EIR Section 3.10, Land Use and Planning (Figure 3.10-3). Commercial land uses are identified as compatible with 65 70 dBA CNEL noise levels. The CFR Part 150 Land Use Compatibility Guidelines categorizes hotel uses as a transient lodging form of residential. Additionally, and for reasons more fully stated in the Los Angeles County Airport Land Use Commission findings and order, all of which are incorporated herein by reference, the Project is fully consistent with the Los Angeles County Airport Land Use Plan. Separately, as noted above, as a means of responding to noise complaints associated with Project construction, the Project will include designation of a Community Affairs Liaison who will be responsible for responding within 24 hours to any local complaints about construction activity.

The Project's consistency with the goals and policies of the Noise Element is further discussed in EIR Section 3.11, Noise and Vibrations. The analysis concludes that the Project is not inconsistent with the relevant Noise Element goals and policies.

For the foregoing reasons, the Project is consistent with the Noise Element.

## **VI. OPEN SPACE ELEMENT**

The Open Space Element is a plan to address the current and future recreation needs of the City for parkland and recreational facilities and for the conservation of open space. The primary goal of the Open Space Element is to provide recreational park facilities for all residents in the City. The second goal of the Open Space Element is to provide additional types of open space and to preserve existing open space resources. Relevant policies, goals and objectives applicable to the proposed Project are as follows:

- Additional municipal park land shall be acquired to provide a minimum city-wide total of one acre per 1000 residents.
- The City of Inglewood in reviewing and approving development plans, shall require the provision of landscaped plazas and gardens when possible, and the provision of landscaping within building setbacks and parking lots.
- The City of Inglewood shall implement public works projects to improve streetscapes including the planting of parkway trees, the provision of landscaped street medians and the undergrounding of utility lines. The City shall also implement regulations and programs to reduce visual clutter along city streets resulting from obsolete signs, billboards, poor property maintenance, graffiti, etc.

The Project does not include residential use and therefore will not increase the residential population of the City, nor impact the one acre of park land per 1,000 residents ratios.

Consistent with the second goal, the Project includes a landscaped outdoor plaza with community gathering space, new pedestrian networks, landscaping and edge treatment, other

sidewalks and pavement improvements that would be designated to facilitate pedestrian movement and activities, as well as extensive perimeter and interior landscaping. Specifically, the outdoor plaza will include community gathering spaces, with landscaping, seating areas, public art, and outdoor stage. The Project will also pay the applicable park development fees under Inglewood Municipal Code Chapter 12.

The Project will improve streetscapes including the planting of new trees, the provisions of landscaped street medians, and the undergrounding of utility lines. The Project will also 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.

The Project's consistency with the goals and policies of the Open Space Element is further discussed in EIR Section 3.13, Public Services. The Analysis concludes that the Project will not be inconsistent with the applicable Open Space element goals and policies.

For the foregoing reasons, the Project is consistent with the Open Space Element.

## **VII. SAFETY ELEMENT**

The Safety Element contains goals, objectives and policies that are designed to ensure that the citizens of Inglewood can be protected from unreasonable risks caused by natural and manmade disasters. Relevant policies, goals and objectives applicable to the Project are as follows:

- Provide measures to reduce seismic impacts.
- Restrict new structures for human occupancy from being constructed across active faults.
- Ensure that hazardous material is located at safe distances from residences, schools, hospitals and large assemblages of people; and that they are located in zones that are appropriate for their use.
- Public safety personnel provide improved response and services to the community.
- Provide sufficient manpower and equipment to respond adequately to fire emergencies and civil disturbance.

In order to implement the Project, certain minor amendments to the Safety Element Water Distribution System Map to show the decommissioning of the existing Inglewood Water Well #6 and replacement with a new Water Well #8 and accompanying pipelines are proposed. No other amendments to the Safety Element are proposed.

As discussed in Chapter 3.6 of the EIR with respect to reduction of seismic impacts, no known active, sufficiently active, or well-defined faults have been recognized as crossing or being immediately adjacent to the Project site and the Project is not expected to expose people or structures to adverse effects from seismic-induced settlement or liquefaction as it is not located within a liquefaction Hazard Zone.

The Project will adhere to the California Building Code, established in City of Inglewood Municipal Code Chapter 11, Article 2, and enforced through plan check and building inspection services administered by the City and imposed on the Project, including seismic safety requirements in order to avoid impacts from seismic activity. The structural elements of the Project would be required to undergo appropriate design-level geotechnical evaluations prior to final design and construction in accordance with Chapter 18 of the California Building Code. The Project engineers and City building officials will implement the regulatory requirements of the California Building Code, County and City ordinances, and the California Geological Survey Guidelines for Evaluating and Mitigating Seismic Hazards in California, to ensure all buildings and structures are constructed in compliance with the law, as also detailed in California Building Code, Chapter 18.

With respect to hazardous material, the EIR analyzed the hazardous material impacts of the Project, including on nearby sensitive receptors, and concluded that the Project would not have any significant, unavoidable hazardous material impact. The Project will comply with all federal, state and local regulations regarding the handling, use, storage, transportation, and disposal of hazardous material, including in the event that hazardous material is discovered during the excavation and construction of the Project.

Construction activities would also likely require the use of limited quantities of hazardous material such as fuels, oils, and lubrications for construction equipment; paints and thinners; and solvents and cleaners. These hazardous materials are typically packaged in consumer quantities and used in accordance with manufacture recommendations, and would be transported to and from the Project site. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, State, and federal regulations including the Hazardous Waste Control Act (California Health and Safety Code section 25100 et seq.) Compliance with these requirements will ensure that the storage, handling, and disposal of hazardous materials is done in accordance with practices that minimize exposure and inadvertent releases.

The use of common hazardous materials will occur as part of the operation of the Project, primarily associated with maintenance activities as well as storage of diesel for the backup generator and biomedical supplies for the sports medicine clinic. Because hazardous material associated with the types of uses included in the Project are typically handled and transported in small quantities, and because the health effects associated with them are generally not as serious as industrial uses, operation of a majority of the new uses at the Project site would not cause an adverse effect on the environment with respect to the routine transportation, use, or disposal of general office and household hazardous material.

The sports medicine clinic included in the Project will likely include relatively small quantities of bio-hazards and other chemicals that are typically found in medical settings, such as medical supplies, oxygen tanks and other treatment supplies that fit the classification of a hazardous material waste. In addition, any administration of medication hypodermically would produce bio-hazard waste. As part of adhering to local Certified Unified Program Agency ("CUPA") requirements, the clinic would be required to prepare and submit a Hazardous Materials Management Plan and Hazardous Materials Business Plan to the County.

With respect to public services, the Project is located in close proximity to fire and police services and emergency responders are not expected to be substantially affected by the Project. (see discussion under Land Use Element, Community Facilities, above.)

The Project's consistency with the goals and policies of the Safety Element is discussed in the EIR Section 3.8, Hazards and Hazardous Materials, and 3.13, Public Services. The Analysis concludes that the Project will not be inconsistent with these goals and policies.

For the foregoing reasons, the Project is consistent with the Safety Element, as proposed to be amended.

## **VIII. ENVIRONMENTAL JUSTICE ELEMENT**

Senate Bill 1000 ("SB 1000"), the Planning for Healthy Communities Act, requires cities and counties to adopt an environmental justice element or integrate environmental justice goals, objectives, and polies into other element of their general plans. In 2018, the City separately began the process of conducting outreach and preparing an Environmental Justice Element. One May 6, 2020, the Planning Commission recommended the Environmental Justice Element for adoption (GPA 2020-001). The Environmental Justice Element sets forth goals and policies related to supporting environmental justice in the City. Relevant draft Goals and Policies applicable to the Project are as follows:

- **Meaningful Public Engagement:** Residents and stakeholders who are aware of, and effectively participate in, decisions that affect their environment and quality of life
- **Land Use and the Environment:** The community's exposure to pollution in the environment is minimized through sound planning and public decision making.
- **Mobility and Active Living:** A Community that promotes physical activity and opportunities for active living.
- **Healthy and Affordable Housing:** A City with safe and sanitary housing conditions and affordable housing options.
- **Public Facilities:** Adequate and equitably distributed public facilities are available in the community.

While the Project is fully independent of the General Plan amendment, and thus much of the Project's public review and approval occurred in advance of the City's adoption of the Environmental Justice Element, the Project was subject to a public review process that was consistent with the public participation goals set forth in the Environmental Justice Element. Specifically, the Project is subject to a public review and approval process that allows for public participation and submission of comments to City staff and decisionmakers regarding the Project. Public notice of hearings related to the Project must comply with all applicable state and local public notice requirements. The Project was studied under a robust environmental review process in compliance with CEQA that allowed for meaningful public participation. The environmental review process included a number of opportunities for meaningful public engagement, including a public Scoping Meeting on March 12, 2018, at Inglewood City Hall to provide information about the Project and the anticipated CEQA process; and a public review and comment period on the Draft EIR of 89 days, significantly exceeding the 45-day public



review period required under CEQA. During the public comment period, an electronic copy of the Draft EIR and all related appendices were made available for public review on the City's website and at the Project website ([www.IBECProject.com](http://www.IBECProject.com)), and printed copies were made available at the following locations: City of Inglewood Economic and Community Development Department; City of Inglewood Main Library; and the Inglewood Crenshaw-Imperial Branch Library. Following the public review and comment period for the Draft EIR, the City prepared responses to address the comments received on the Draft EIR within the specified public review period. These responses are provided in the Final EIR

While the Project with respect to the goal and related policies regarding community exposure to environmental pollution, as described under the Land Use Element, Noise Elements, and Safety Element analyses above, which are incorporated herein by reference, will generate certain environmental impacts related to construction and operations, it is consistent with the General Plan's policy of promoting new, non-environmentally polluting uses, and reflects sound planning and public decision making to minimize the public's exposure to pollution in the environment. The Project will be designed and constructed to meet the US Green Building Council's Leadership in Energy and Environmental Design (LEED®) Gold certification requirements. The Project will also implement a wide-range of mitigation measures intended to reduce or eliminate environmental impacts associated with Project construction and operation, including commitments to a comprehensive Transportation Demand Management program to reduce both vehicle trips and vehicle miles traveled, encourage public transit use, comply with a net-zero greenhouse gas standard, and implement all feasible mitigation measures for air quality and noise impacts, all as reflected in the MMRP. The Project is required to comply with all applicable federal and state environment regulations.

With respect to the goal and related policies regarding promotion of physical activity and opportunities for active living, the Project will include streetscape and pedestrian circulation system improvements that will increase walkability and improve the pedestrian and bicyclist experience and accessibility on adjacent public rights of way near the Project site. The Project will include illumination to highlight circulation paths and landscape features, and to create a safe pedestrian experience. The Project includes a landscaped outdoor plaza with community gathering space, new pedestrian networks, landscaping and edge treatment, other sidewalk and pavement improvements designed to facilitate pedestrian movement and activities, as well as extensive perimeter and interior landscaping. Specifically, the outdoor plaza will include community gathering spaces, with landscaping, seating areas, public art, and an outdoor stage. In addition, the Project would provide extraordinary public benefits contained in Exhibit C, attached to the Development Agreement, including improving Inglewood parks.

With respect to the goal and related policies regarding healthy and affordable housing, as described under the Housing Element analysis above, which is incorporated herein by reference, the Project does not propose the development of housing, and will not impact existing housing stock. The Project includes a number of community benefits commitments designed to further the Environmental Justice Element's provisions regarding housing, including funding for affordable housing, first time homebuyers assistance, support for rental and anti-eviction

services, and capacity building for housing-focused non-profits, as described in more detail in the public benefits contained in Exhibit C, attached to the Development Agreement.

With respect to the goal and related policies regarding adequate and equitable distribution of public facilities (such as street and roads, government buildings, schools, and public open space), the Project does not propose development of such facilities. However, the Project would include an outdoor plaza with community gathering space, and would provide the public benefits related to public facilities as contained in Exhibit C, attached to the Development Agreement.

For the foregoing reasons, the Project is consistent with the Environmental Justice Element and furthers the City's goals of achieving the goals and policies set forth therein.

## **IX. CONCLUSION**

Based on the above analysis provided in this document and as further detailed in the record, including but not limited to the CEQA Findings, Agenda Report and other documents referenced herein, the Project, on balance, is consistent with the General Plan (both as the General Plan existed prior to the separate, City-wide General Plan amendments adopted on June 30, 2020, and as the General Plan now exists with those June 30, 2020 amendments incorporate), as proposed to be amended by the Project-specific amendments described above.

City Council Staff Report

Attachment 10:

Draft Specific Plan Amendment Resolution

1 RESOLUTION NO. \_\_\_\_\_

2  
3 A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF  
4 INGLEWOOD, CALIFORNIA, ADOPTING SPECIFIC PLAN  
5 AMENDMENT NO. 2020-001 (SPA-2020-001) TO AMEND  
6 THE INGLEWOOD INTERNATIONAL BUSINESS PARK  
7 SPECIFIC PLAN (ADOPTED DECEMBER 21, 1993) FOR THE  
8 INGLEWOOD BASKETBALL AND ENTERTAINMENT  
9 CENTER.

10 (SPA-2020-001)

11  
12 **SECTION 1.**

13 WHEREAS, Murphy's Bowl LLC (Project Sponsor) seeks the development  
14 of the Inglewood Basketball and Entertainment Center (IBEC) that includes an  
15 arena intended to promote the enjoyment and recreation of the public by providing  
16 access to the City's residents in the form of spectator sports, specifically  
17 basketball, with up to 18,000 fixed seats to host National Basketball Association  
18 games, and with up to 500 additional temporary seats for other events such as  
19 family shows, concerts, corporate and community events, and other sporting  
20 events; an up to 85,000-square foot team practice and athletic training facility; up  
21 to 71,000 square feet of LA Clippers office space; an up to 25,000-square foot sports  
22 medicine clinic; up to 63,000 square feet of ancillary and related arena uses  
23 including retail and dining; an outdoor plaza adjacent to the arena; parking  
24 facilities; relocation of a City of Inglewood groundwater well; and various  
25 circulation, infrastructure and other ancillary uses (the Project). The Project will  
26 also include a limited-service hotel. The area of the IBEC Project is shown in  
27 Exhibit A; and  
28

1           WHEREAS, a portion of the Project site shown in Exhibit A is located  
2 within the area subject to the Inglewood International Business Park Specific  
3 Plan; and

4           WHEREAS, implementation of the Project necessitates an amendment to  
5 the Inglewood International Business Park Specific Plan (Specific Plan  
6 Amendment) attached to this Resolution as Exhibit B, which is incorporated  
7 herein by this reference; and

8           WHEREAS, on May 1, 2020, the Economic and Community Development  
9 Department Director directed Planning Division staff to prepare various Project  
10 approval materials, including the Specific Plan Amendment, and schedule a public  
11 hearing before the Planning Commission; and

12           WHEREAS, the proposal was set for a duly-noticed public hearing before  
13 the Planning Commission in the City Council Chambers, Ninth Floor, of the  
14 Inglewood City Hall, on the 17th day of June 2020, beginning at the hour of 7:00  
15 p.m.; and

16           WHEREAS, on June 17, 2020, the Planning Commission conducted the  
17 duly noticed hearing at the time and place stated in the notice and afforded all  
18 persons interested in the matter of the proposed Specific Plan Amendment to the  
19 Inglewood International Business Park Specific Plan SPA-2020-001, or in any  
20 matter or subject related thereto, an opportunity to be heard by the Planning  
21 Commission and to submit any testimony or evidence in favor or against the  
22 proposed Specific Plan Amendment; and

23           WHEREAS, pursuant to the California Environmental Quality Act, Public  
24 Resources Code, Section 21000 et seq. (CEQA), including without limitation  
25 Section 21168.6.8, the City prepared an Environmental Impact Report (EIR) for  
26 the Project, including the Specific Plan Amendment, (State Clearinghouse No.  
27 2018021056), which analyzed environmental impacts of the proposed Project.  
28 Prior to making a recommendation of the Project (including the Specific Plan

1 Amendment) the Planning Commission reviewed and considered the EIR and  
2 recommended that the City Council certify the EIR, make certain environmental  
3 findings and adopt a Statement of Overriding Considerations for significant and  
4 unavoidable impacts of the Project that would remain even with the  
5 implementation of necessary mitigation measures (together, the CEQA Findings),  
6 and adopt a Mitigation Monitoring and Reporting Program (MMRP) for the  
7 Project.

8 WHEREAS, the Planning Commission considered the Specific Plan  
9 Amendment and testimony and information received at the public hearing  
10 relating to the Project, including without limitation the oral and written reports  
11 from City staff, oral reports from City consultants, and the EIR.

12 WHEREAS, after taking public testimony and fully considering all the  
13 issues, the Planning Commission adopted Resolution No. 1870, entitled

14  
15 **A RESOLUTION OF THE PLANNING COMMISSION OF**  
16 **THE CITY OF INGLEWOOD, CALIFORNIA,**  
17 **RECOMMENDING TO THE CITY COUNCIL APPROVAL OF**  
18 **SPECIFIC PLAN AMENDMENT NO. 2020-001 (SPA-2020-**  
19 **001) TO AMEND THE INGLEWOOD INTERNATIONAL**  
20 **BUSINESS PARK SPECIFIC PLAN (ADOPTED DECEMBER**  
21 **21, 1993) FOR THE INGLEWOOD BASKETBALL AND**  
22 **ENTERTAINMENT CENTER.**

23 WHEREAS, the matter of Resolution No. 1870 was presented to the City  
24 Council on July 7, 2020, who then scheduled a public hearing for July 21, 2020;  
25 and

26 WHEREAS, notice of the time and place of the July 21, 2020, hearing was  
27 given as required by law; and  
28

1           WHEREAS, on July 21, 2020, the City Council conducted the public hearing  
2 at the time and place stated above and afforded all persons interested in the  
3 matter of Specific Plan Amendment No. 2020-001, or any matter or subject related  
4 thereto, an opportunity to appear before the City Council and to be heard and to  
5 submit any testimony or evidence in favor of or against the Specific Plan  
6 Amendment No. 2020-001.

7 **SECTION 2.**

8           NOW, THEREFORE, BE IT RESOLVED, by the City Council of the  
9 City of Inglewood, California, based on the entirety of the materials before  
10 the City Council, including without limitation, agenda reports to the  
11 Planning Commission and City Council; the EIR and all appendices thereto  
12 and supporting information; Planning Commission Resolution No. 1870; City  
13 Council Resolution No. \_\_\_\_ (EIR Certification Resolution) including the  
14 CEQA Findings and Statement of Overriding Considerations, and MMRP  
15 attached as Exhibit B and C, respectively, thereto; all plans, drawings, and  
16 other materials submitted by the Project Sponsor; minutes, reports, and  
17 public testimony and evidence submitted as part of the Planning  
18 Commission's and City Council's duly-noticed meetings regarding the IBEC  
19 Project; the record of proceedings prepared in connection with AB 987  
20 pursuant to Public Resources Code section 21168.6.8; and all other  
21 information contained in the City's administrative record concerning the  
22 Project (collectively, the Record), which it has carefully reviewed and  
23 considered, the City Council finds as follows:

24           1.       That the foregoing Recitals are true and correct and made part of this  
25 Resolution.

26           2.       That all procedural requirements for the City Council to approve  
27 Specific Plan Amendment SPA-2020-001 have been followed.

28

1           3.     That the Specific Plan Amendment SPA-2020-001 substantially  
2 complies with applicable requirements of state law, including requirements under  
3 Government Code Section 65450 et seq.

4           4.     That as described in Exhibit D (General Plan Consistency Analysis)  
5 to City Council Resolution \_\_\_\_ (General Plan Amendment Resolution), which is  
6 incorporated by reference as though fully set forth herein, the Specific Plan  
7 Amendment SPA-2020-001 is consistent with the Inglewood General Plan as  
8 amended.

9           5.     That the Specific Plan Amendment SPA-2020-001 establishes  
10 appropriate land uses and development standards for the efficient and orderly  
11 development of the Project and the adoption of the Specific Plan Amendment is  
12 reasonably related to protection of the public health, safety, and welfare, as  
13 further described in the City Council Agenda Report and City Council Resolution  
14 No. \_\_\_\_\_ (EIR Certification Resolution), which includes a Statement of  
15 Overriding Considerations.

16           6.     An EIR has been prepared for the IBEC Project, including the  
17 proposed Specific Plan Amendment. Prior to final approval of this Specific Plan  
18 Amendment the City Council certified the EIR and adopted CEQA Findings  
19 including a Statement of Overriding Considerations for significant and  
20 unavoidable impacts of the Project that would remain significant even with the  
21 implementation of all feasible mitigation measures specified in the EIR, and  
22 adopted an MMRP for the Project in accordance with CEQA as provided in City  
23 Council Resolution No. \_\_\_\_\_ (EIR Certification Resolution).

24           **SECTION 3.**

25           BE IT FURTHER RESOLVED, that pursuant to the foregoing  
26 recitations and findings, the City Council of the City of Inglewood, California,  
27 hereby approves Specific Plan Amendment No. SPA-2020-001 to the  
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Inglewood International Business Park Specific Plan in the form attached to this Resolution as Exhibit B.

The City Clerk shall certify to the passage and adoption of this Resolution and to its approval by the City Council and this Resolution shall be in full force and effect immediately upon adoption.

This Resolution to approve Specific Plan Amendment No. SPA-2020-001, attached hereto as Exhibit B, is passed, approved and adopted by the City Council of the City of Inglewood this 21<sup>st</sup> day of July 2020.

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**JAMES T. BUTTS**  
**MAYOR OF THE CITY OF**  
**INGLEWOOD, CALIFORNIA**

**Attest:**

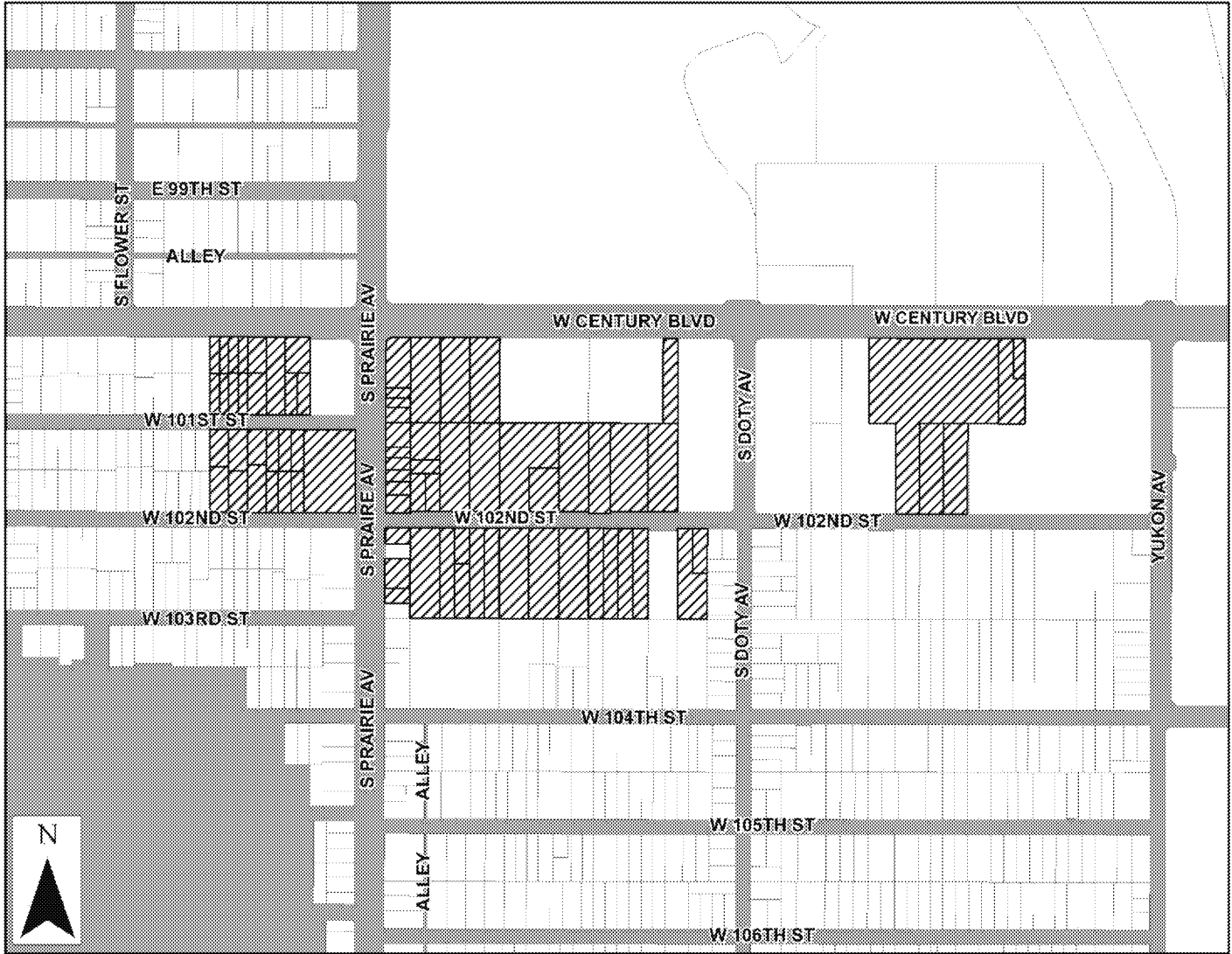
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**YVONNE HORTON**  
**CITY CLERK**  
**(SEAL)**

SPA Resolution

Exhibit A:

IBEC Area Map



SPA Resolution

Exhibit B:

Amendments to the Inglewood International Business Park Specific Plan

## EXHIBIT B

### TEXT AMENDMENTS TO THE INGLEWOOD INTERNATIONAL BUSINESS PARK SPECIFIC PLAN

Added text is shown in **bold underline**.

#### Section 1.

The “Relationship to Other Plans” subsection on pages 2 and 3 of Section I (“INTRODUCTION”) of the Inglewood International Business Park Specific Plan is amended to add a new Section C, to read as follows:

#### **C. Relationship to IBEC Project and Sports and Entertainment Overlay Zone**

**In furtherance of the General Plan amendment adopted by Resolution No. \_\_\_\_\_ regarding sports and entertainment facilities, the City on \_\_\_\_\_, 2020, adopted Ordinance No. \_\_\_\_\_, creating the Sports and Entertainment Overlay Zone, and undertook several other actions to approve and facilitate the development of a sports and entertainment facility project referred to as the Inglewood Basketball and Entertainment Center project (the “IBEC Project”), the boundaries of which include certain parcels within the IIBP Specific Plan area, Parcels 4032007900, 4032007901, 4032007902, 4032007903, 4032007904, 4032007905, 4032007035, 4032008900, 4032008901, 4032008902, 4032008903, 4032008904, 4032008905, 4032008907, 4032008908, 4032008001, 4032008034, and 4032008035 (the “IBEC Project Related Parcels”). By doing so the City intends, as provided below, that if developed in connection with the IBEC Project the IBEC Project Related Parcels shall be excluded from the IIBP Specific Plan, but otherwise the provisions of the IIBP Specific Plan shall apply.**

#### Section 2.

The “Description of the Inglewood International Business Park” subsection on page 3 of Section I (“INTRODUCTION”) of the Inglewood International Business Park Specific Plan is amended to read as follows:

[...]

The IIBP is located in the southern portion of the City of Inglewood. The area boundaries are 102nd Street to the north, Yukon Avenue to the east, 104th Street to the south, and Prairie Avenue to the west. The area is bisected by the north-south running Doty Avenue (Figure 2). **Provided, however, if applicable in connection with the development of the IBEC Project, the IBEC Project Related Parcels shall be excluded from the IIBP Specific Plan.**

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City Council Staff Report  
Attachment 11:  
Draft Zone Change Ordinance



1				
2	4032001048	4032001913	4032008900	4034004911
3	4032001005	4032002913	4032008901	4034004912
4	4032001006	4032002914	4032008902	4034004913
5	4032001033	4032002915	4032008903	4034005900
6	4032001039	4032002916	4032008904	4034005901
7	4032001049	4032002917	4032008905	4034005902
8	4032001900	4032003912	4032008907	4034005903
9	4032001901	4032003914	4032008908	4034005904
10	4032001902	4032003915	4034004900	4034005905
11	4032001903	4032004913	4034004901	4034005906
12	4032001904	4032004914	4034004902	4034005907
13	4032001905	4032007035	4034004903	4034005908
14	4032001906	4032007901	4034004904	4034005909
15	4032001907	4032007902	4034004905	4034005910
16	4032001908	4032007903	4034004906	4034005911
17	4032001909	4032007905	4034004907	4034005912
18	4032001910	4032008001	4034004908	
19	4032001911	4032008034	4034004909	
20	4032001912	4032008035	4034004910	

21           ; and

22           **WHEREAS**, the State Legislature passed SB 1333 (2018) which  
23 requires that all charter cities resolve inconsistencies between Zoning  
24 designations and General Plan Land Use designations within a reasonable  
25 time; and

26           **WHEREAS**, the Zoning designations of thirteen (13) of the site parcels  
27 are inconsistent with the existing Commercial/Industrial General Plan Land  
28 Use designations whereby they have Zoning designations of P-1 (Automobile



1 Parking), R-3 (Multiple-Family), and R-2 (Limited Multiple-Family), which  
2 includes the following properties as listed by Assessor Identification Numbers

3				
4	4034005900	4034005904	4034005908	4034005912
5	4034005901	4034005905	4034005909	
6	4034005902	4034005906	4034005910	
7	4034005903	4034005907	4034005911	

8  
9 ; and,

10 **WHEREAS**, until such time that the City comprehensively updates the  
11 General Plan and associated Zoning designations, which would resolve any  
12 inconsistencies citywide, the Project entitlements present an opportunity to  
13 resolve such inconsistencies on the site; and

14 **WHEREAS**, the attached Exhibit B depicts the existing Zoning  
15 designations with the location of the Sports and Entertainment Overlay Zone  
16 (Overlay) and Exhibit C depicts the proposed C-2A (Airport Commercial)  
17 Zoning designations along with the Overlay; and

18 **WHEREAS**, the proposal was set for a duly-noticed public hearing  
19 before the Planning Commission in the City Council Chambers, Ninth Floor, of  
20 the Inglewood City Hall, on the 17<sup>th</sup> day of June 2020, beginning at the hour of  
21 7:00 p.m.; and

22 **WHEREAS**, on June 17, 2020, the Planning Commission conducted the  
23 hearing at the time and place stated above and afforded all persons interested  
24 in this matter, or in any matter or subject related thereto, an opportunity to be  
25 heard by the Planning Commission and to submit any testimony or evidence in  
26 favor or against the proposal; and

27 **WHEREAS**, pursuant to the California Environmental Quality Act,  
28 Public Resources Code, Section 21000 et. Seq. (CEQA), including without

1 limitation Section 21168.6.8, the City prepared an Environmental Impact  
2 Report (EIR) for the Project, including Zone Change ZC-2020-001 (State  
3 Clearinghouse No. 2018021056) which analyzed environmental impacts of the  
4 proposed Project. Prior to making a recommendation on the Project (including  
5 the Zone Change ZC-2020-001) the Planning Commission reviewed and  
6 considered the EIR and recommended that the City Council certify the EIR,  
7 make certain environmental findings and adopt a Statement of Overriding  
8 Considerations for significant and unavoidable impacts of the Project that  
9 would remain even with the implementation of necessary mitigation measures  
10 (together, the CEQA Findings), and adopt a Mitigation Monitoring and  
11 Reporting Program (MMRP) for the Project; and,

12       **WHEREAS**, the Planning Commission considered the Zone Change and  
13 testimony and information received at the public hearing relating to the  
14 Project, including without limitation the oral and written reports from City  
15 staff, oral reports from City consultants, and the EIR. After taking public  
16 testimony and considering the issues, the Planning Commission adopted and  
17 approved Resolution No. 1871 entitled:

18  
19       **A RESOLUTION OF THE PLANNING COMMISSION OF THE**  
20 **CITY OF INGLEWOOD, CALIFORNIA, RECOMMENDING TO**  
21 **THE CITY COUNCIL FOR APPROVAL, ZONE CHANGE ZC-**  
22 **2020-001 TO ESTABLISH A SPORTS AND ENTERTAINMENT**  
23 **OVERLAY ZONE AND REZONE CERTAIN PARCELS, AND**  
24 **ZONING CODE AMENDMENT ZCA-2020-002 TO CHAPTER 12**  
25 **(PLANNING AND ZONING) OF THE INGLEWOOD**  
26 **MUNICIPAL CODE TO ESTABLISH REGULATIONS FOR**  
27 **THE SPORTS AND ENTERTAINMENT OVERLAY ZONE AND**  
28 **ADJUST OTHER LAND USE CONTROLS.**

26       **WHEREAS**, the matter of proposed Zone Change ZCA-2020-001 was  
27 presented to the City Council on July 7, 2020, who then scheduled a public  
28 hearing for July 21, 2020, and,

1           **WHEREAS**, notice of the time and place of the hearing was given as  
2 required by law; and,

3           **WHEREAS**, the City Council conducted the hearing at the time and place  
4 stated in the notice and afforded all persons interested in the matter of the  
5 proposed Zone Change, or in any matter or subject related thereto, an  
6 opportunity to be heard by the City Council and to submit any testimony or  
7 evidence in favor or against the proposed Zone Change; and,

8           **WHEREAS**, after taking public testimony and considering the issues, the  
9 City Council determined that the Sports and Entertainment Overlay Zone  
10 should be established; and,

11           **WHEREAS**, the City Council has carefully considered all testimony and  
12 evidence presented in this matter, and being advised finds as follows:

13 **SECTION 1**

14           Pursuant to the California Environmental Quality Act, Public Resources  
15 Code, Section 21000, et seq. (CEQA), the City prepared an Environmental  
16 Impact Report (EIR) for the Inglewood Basketball and Entertainment Center  
17 (State Clearinghouse No. 2018021056), which analyzed environmental impacts  
18 of the proposed project and the associated entitlements. Prior to making a  
19 decision on the Zone Change, the City Council reviewed and considered the EIR  
20 and pursuant to Resolution No. \_\_\_\_ (City Council EIR Certification  
21 Resolution) certified the EIR, made certain environmental findings, adopted a  
22 Mitigation Monitoring and Reporting Program, and adopted a Statement of  
23 Overriding Considerations for significant and unavoidable impacts of the  
24 Project that would remain even with the implementation of necessary  
25 mitigation measures specified in the EIR.

26 **SECTION 2.**

27           Based on the entirety of the materials before the City Council, including  
28 without limitation, agenda reports to the City Council and Planning

1 Commission; the EIR and all appendices thereto and supporting information;  
2 Planning Commission Resolution No. 1871; City Council Resolution No. \_\_ (EIR  
3 Certification Resolution) including the CEQA Findings and Statement of  
4 Overriding Considerations and MMRP attached as Exhibits B and C thereto; all  
5 plans, drawings, and other materials submitted by the Project Sponsor;  
6 minutes, reports, and public testimony and evidence submitted as part of the  
7 Planning Commission's and City Council's duly-noticed meetings regarding the  
8 IBEC Project; the record of proceedings prepared in connection with AB 987  
9 pursuant to Public Resources Code section 21168.6.8; and all other information  
10 contained in the City's administrative record concerning the Project  
11 (collectively, the Record), which it has carefully reviewed and considered, the  
12 City Council finds as follows:

13 1. The proposed Zone Change to establish the SE Overlay Zone and  
14 rezoning of certain properties to make them consistent with the land use  
15 designation will be consistent with the Inglewood General Plan, the  
16 Industrial land use designation, and the Inglewood International  
17 Business Park Specific Plan, as amended, for the reasons set forth in  
18 Exhibit D (General Plan Consistency Analysis) to City Council Resolution  
19 No. \_\_ (General Plan Amendment Resolution), which are incorporated  
20 herein by reference, will bring zoned properties that did not conform  
21 with the General Plan land use designation into conformance, and will  
22 support, among others, the following objectives:

- 23 a. Promote the development of sports and entertainment facilities  
24 and related uses on underutilized land, in appropriate locations,  
25 creating economic development and employment opportunities for  
26 the City's residents.
- 27 b. Provide for the orderly development and redevelopment of the City  
28 while preserving a measure of diversity among its parts.

- 1           c. Helps promote sound economic development and increase  
2           employment opportunities for the City's residents by responding to  
3           changing economic conditions.
- 4           d. Helps promote Inglewood's image and identity as an independent  
5           community within the Los Angeles metropolitan area.
- 6 2.       That the rezoning of certain properties to make them consistent with the  
7       General Plan land use designation is necessary to ensure those properties  
8       are consistent with the General Plan; and
- 9 3.       The Zone Change (ZCA-2020-001) will not constitute the granting of a  
10       special privilege to a property owner inconsistent with the current or  
11       designated uses or limitations of other properties in the vicinity for the  
12       reasons set forth in Planning Commission Resolution No 1871 (Zone  
13       Change and Zoning Code Amendment Resolution), which are  
14       incorporated herein by reference.
- 15 4.       The Zone Change (ZC-2020-001) will be appropriate for the subject  
16       property in terms of the adequacy of the site to accommodate land uses  
17       permitted by the proposed zone for the reasons set forth in Planning  
18       Commission Resolution No 1871 (Zone Change and Zoning Code  
19       Amendment Resolution), which are incorporated herein by reference.
- 20 5.       That the rezoning of properties that are inconsistent with the General  
21       Plan land use designation is appropriate for the site in order to resolve  
22       such inconsistencies and make the zoning on this site consistent with the  
23       General Plan land use designations.
- 24 6.       That an EIR has been prepared for the IBEC Project, including the  
25       proposed Zone Change, and was certified by the City Council prior to  
26       approval of Zone Change ZC-2020-001. The City Council adopted CEQA  
27       Findings including a Statement of Overriding Considerations for  
28       significant and unavoidable impacts of the Project that would remain

1 significant even with the implementation of all feasible mitigation  
2 measures specified in the EIR, and adopted an MMRP for the Project in  
3 accordance with CEQA as provided in City Council Resolution No. \_\_\_\_  
4 (EIR Certification Resolution).

5 **SECTION 2.**

6 WHEREAS, at the conclusion of the public hearing, the City Council  
7 determined that the Zone Change specified herein should be approved.

8 **NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF INGLEWOOD,**  
9 **CALIFORNIA, DOES HEREBY ORDAIN AS FOLLOWS:**

10 The City Council concurs with the Planning Commission  
11 recommendation and does hereby approve Zone Change No. ZC-2020-001, to  
12 establish a Sports and Entertainment Overlay Zone and rezone certain other  
13 parcels, under the provisions of Chapter 12, Article 27 of the Inglewood  
14 Municipal Code.

15 The City Clerk shall certify to the passage and adoption of this ordinance  
16 and to its approval by the City Council and shall cause the same to be published  
17 in accordance with the City Charter and thirty days from the final passage and  
18 adoption, this ordinance shall be in full force and effect.

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28

1 This ordinance to establish a Sports and Entertainment Overlay Zone and to  
2 rezone certain other parcels, was introduced by the City Council on the 21<sup>st</sup> day  
3 of July 2020, and is passed, approved and adopted by the City Council of the  
4 City of Inglewood this \_\_\_\_ day of \_\_\_\_\_ 2020.

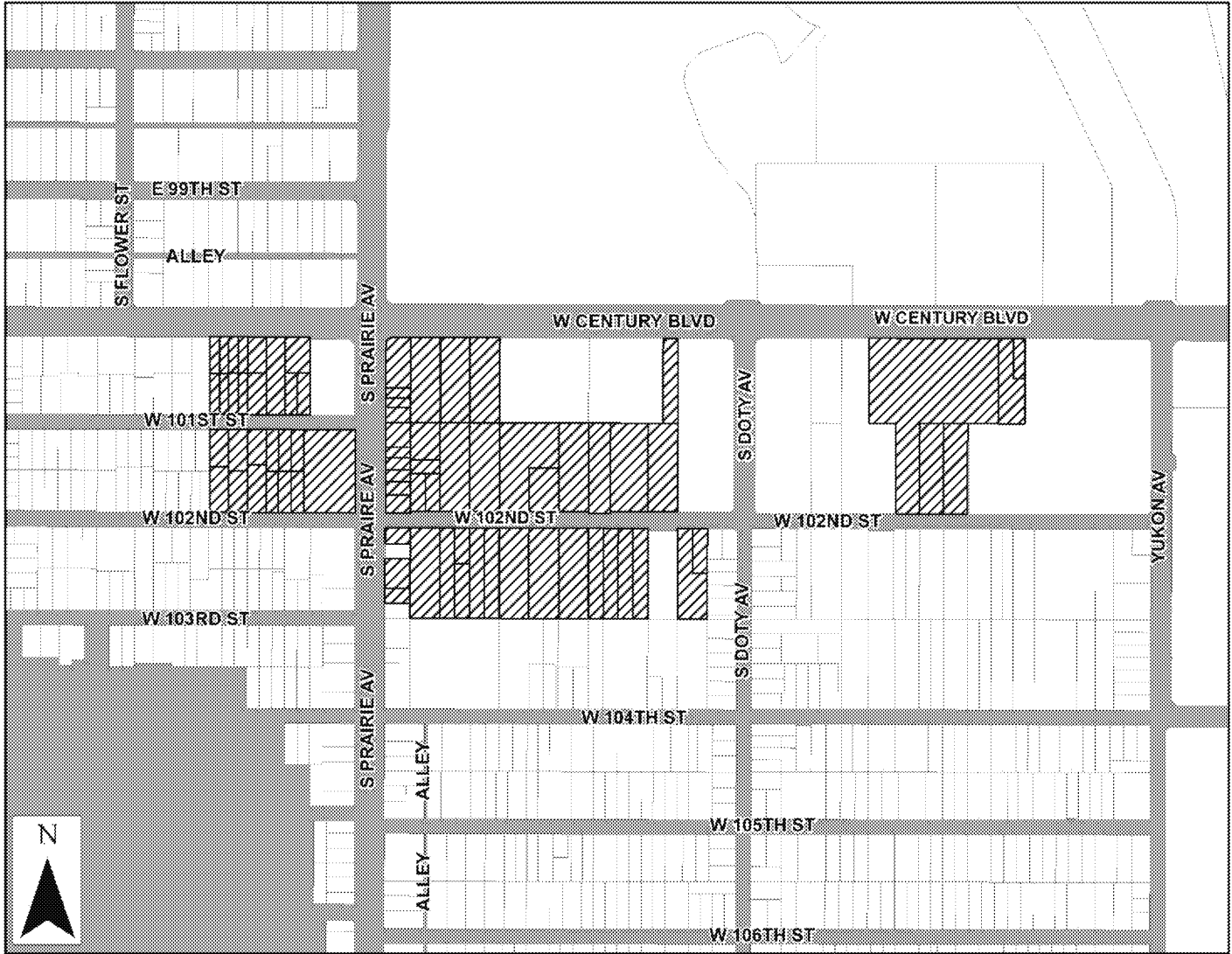
5  
6  
7  
8 \_\_\_\_\_  
9 **JAMES T. BUTTS**  
10 **MAYOR OF THE CITY OF**  
11 **INGLEWOOD, CALIFORNIA**

12 **Attest:**

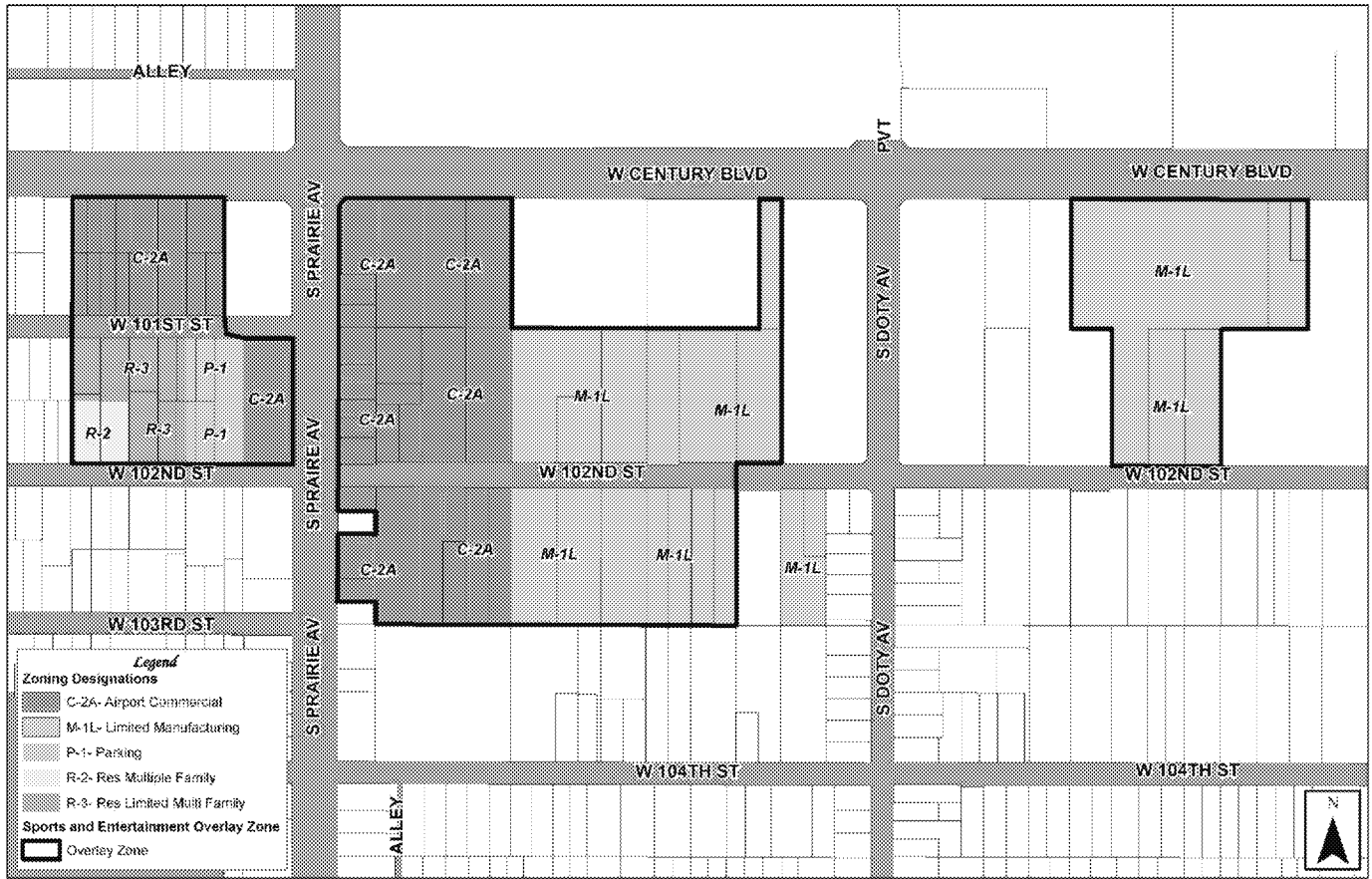
13  
14 \_\_\_\_\_  
15 **YVONNE HORTON**  
16 **CITY CLERK**  
17 **(SEAL)**

ZC Ordinance  
Exhibit A:  
IBEC Area Map





ZC Ordinance  
Exhibit B:  
Existing Zoning Map



ZC Ordinance  
Exhibit C:  
Proposed Zoning Map



City Council Staff Report

Attachment 12:

Draft Zoning Code Amendment Ordinance



1 the Inglewood City Hall, on the 17<sup>th</sup> day of June 2020, beginning at the hour of  
2 7:00 p.m.; and

3       **WHEREAS**, on June 17, 2020, the Planning Commission conducted the  
4 hearing at the time and place stated above and afforded all persons interested  
5 in this matter, or in any matter or subject related thereto, an opportunity to be  
6 heard by the Planning Commission and to submit any testimony or evidence in  
7 favor of or against the proposal; and

8       **WHEREAS**, pursuant to the California Environmental Quality Act,  
9 Public Resources Code, Section 21000, et seq. (CEQA), including without  
10 limitation Section 21168.6.8, the City prepared an Environmental Impact  
11 Report (EIR) for the Project, including Zoning Code Amendment ZC-2020-002,  
12 (State Clearinghouse No. 2018021056), which analyzed environmental impacts  
13 of the proposed Project. Prior to making a recommendation on the Project  
14 (including the Zoning Code Amendment ZC-2020-002), the Planning  
15 Commission reviewed and considered the EIR and recommended that the City  
16 Council certify the EIR, make certain environmental findings and adopt a  
17 Statement of Overriding Considerations for significant and unavoidable  
18 impacts of the Project that would remain even with the implementation of  
19 necessary mitigation measures (together, the CEQA Findings), and adopt a  
20 Mitigation Monitoring and Reporting Program (MMRP) for the Project; and

21       **WHEREAS**, the Planning Commission considered the Zoning Code  
22 Amendment and testimony and information received at the public hearing  
23 relating to the Project, including without limitation the oral and written  
24 reports from City staff, oral reports from City consultants, and the EIR. After  
25 taking public testimony and considering the issues, the Planning Commission  
26 adopted and approved Resolution No. 1871 entitled:



1           A RESOLUTION OF THE PLANNING COMMISSION OF THE  
2           CITY OF INGLEWOOD, CALIFORNIA, RECOMMENDING TO  
3           THE CITY COUNCIL FOR APPROVAL, ZONE CHANGE ZC-  
4           2020-001 TO ESTABLISH A SPORTS AND ENTERTAINMENT  
5           OVERLAY ZONE AND REZONE CERTAIN PARCELS, AND  
6           ZONING CODE AMENDMENT ZCA-2020-002 TO CHAPTER 12  
7           (PLANNING AND ZONING) OF THE INGLEWOOD  
8           MUNICIPAL CODE TO ESTABLISH REGULATIONS FOR  
9           THE SPORTS AND ENTERTAINMENT OVERLAY ZONE AND  
10          ADJUST OTHER LAND USE CONTROLS.

11  
12           **WHEREAS**, the matter of proposed Zoning Code Amendment ZCA-2020-  
13          002 was presented to the City Council on July 7, 2020, who then scheduled a  
14          public hearing for July 21, 2020; and,

15           **WHEREAS**, notice of the time and place of the hearing was given as  
16          required by law; and,

17           **WHEREAS**, the City Council conducted the hearing at the time and place  
18          stated in the notice and afforded all persons interested in the matter of the  
19          proposed Zoning Code Amendment, or in any matter or subject related thereto,  
20          an opportunity to be heard by the City Council and to submit any testimony or  
21          evidence in favor or against the proposed Zoning Code Amendment; and,

22           **WHEREAS**, after taking public testimony and considering the issues, the  
23          City Council determined that certain changes specified herein, should be made  
24          to the text of Chapter 12 of the Inglewood Municipal Code; and,

25           **WHEREAS**, the City Council has carefully considered all testimony and  
26          evidence presented in this matter, and being advised finds as follows:

27          //

1 **SECTION 1.**

2 Pursuant to the California Environmental Quality Act, Public Resources  
3 Code, Section 21000, et seq. (CEQA), the City prepared an Environmental  
4 Impact Report (EIR) for the Inglewood Basketball and Entertainment Center  
5 (State Clearinghouse No. 2018021056), which analyzed environmental impacts  
6 of the proposed project and the associated entitlements, including this Zoning  
7 Code Amendment. Prior to making a decision on the Zoning Code Amendment,  
8 the City Council reviewed and considered the EIR and pursuant to Resolution  
9 No. \_\_\_\_ (City Council EIR Certification Resolution) certified the EIR, made  
10 certain environmental findings, adopted a Mitigation Monitoring and Reporting  
11 Program, and adopted a Statement of Overriding Considerations for significant  
12 and unavoidable impacts of the Project that would remain even with the  
13 implementation of necessary mitigation measures specified in the EIR.

14 **SECTION 2.**

15 Based on the entirety of the materials before the City Council, including  
16 without limitation, agenda reports to the City Council and Planning  
17 Commission; the EIR and all appendices thereto and supporting information;  
18 Planning Commission Resolution No.1871; City Council Resolution No. \_\_ (EIR  
19 Certification Resolution) including the CEQA Findings and Statement of  
20 Overriding Considerations and MMRP attached as Exhibits B and C thereto; all  
21 plans, drawings, and other materials submitted by the Project Sponsor;  
22 minutes, reports, and public testimony and evidence submitted as part of the  
23 Planning Commission's and City Council's duly-noticed meetings regarding the  
24 IBEC Project; the record of proceedings prepared in connection with AB 987  
25 pursuant to Public Resources Code section 21168.6.8; and all other information  
26 contained in the City's administrative record concerning the Project  
27 (collectively, the Record), which it has carefully reviewed and considered, the  
28 City Council finds as follows:

- 1           1) That the proposed Zoning Code Amendment will be consistent with  
2           the Inglewood General Plan, the Industrial land use designation, and  
3           the Inglewood International Business Park Specific Plan, as each is  
4           amended, for the reasons set forth in Exhibit D to (General Plan  
5           Consistency Analysis) to City Council Resolution No.\_\_\_\_ (General  
6           Plan Amendment Resolution), which are incorporated herein by  
7           reference, and will support, among others, the following objectives:
- 8           a. Provide for the orderly development and redevelopment of the City  
9           while preserving a measure of diversity among its parts.
  - 10          b. Help promote sound economic development and increase  
11          employment opportunities for the City's residents by responding to  
12          changing economic conditions.
  - 13          c. Promote Inglewood's image and identity as an independent  
14          community within the Los Angeles metropolitan area.
- 15          2) A change to the text of Chapter 12 to establish regulations for the  
16          Sports and Entertainment Overlay Zone will not constitute the  
17          establishment of unique standards, offering special privilege to a  
18          particular individual or group of individuals, that is inconsistent with  
19          the general intent of the provisions of the Planning and Zoning Code  
20          or that may be detrimental to the general welfare of the community,  
21          for the reasons set forth in Planning Commission Resolution No. 1871  
22          (Zone Change and Zoning Code Amendment Resolution), which are  
23          incorporated herein by reference.
- 24          3) That an EIR has been prepared for the IBEC Project, including the  
25          proposed Zoning Code Amendment, and was certified by the City  
26          Council prior to approval of Zoning Code Amendment ZCA-2020-002.  
27          The City Council certified the EIR and adopted CEQA Findings  
28          including a Statement of Overriding Considerations for significant

1 and unavoidable impacts of the Project that would remain significant  
2 even with the implementation of all feasible mitigation measures  
3 specified in the EIR, and adopted an MMRP for the Project in  
4 accordance with CEQA as provided in City Council Resolution No.  
5 \_\_\_\_ (EIR Certification Resolution).

6 **SECTION 3.**

7 WHEREAS, at the conclusion of the public hearing, the City Council  
8 determined that the Zoning Code Amendment specified herein should be approved.

9 **NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF INGLEWOOD**  
10 **DOES HEREBY ORDAIN AS FOLLOWS:**

11 The Inglewood Municipal Code, Chapter 12 (Planning and Zoning), is hereby  
12 amended by adding Article 17.5, Sports and Entertainment Overlay Zone, to read  
13 as follows:

14 **Article 17.5. Sports and Entertainment Overlay Zone**

15 **Section 12-38.90 Purpose**

16 The Sports and Entertainment Overlay Zone ("SE Overlay Zone") is  
17 established to provide for the orderly development of a Sports and  
18 Entertainment Complex in a comprehensively planned manner, along with a  
19 hotel of no fewer than 100, and no greater than 150, guestrooms, within the  
20 boundaries shown on the map adopted by the City Council by Ordinance \_\_\_\_\_,  
21 as part of this SE Overlay Zone.

22 **Section 12-38.91 Definitions**

23 (A) "Arena" shall mean a sports, entertainment, and public gathering  
24 facility with indoor seating capacity of no more than 18,500 attendees operated  
25 to host events including, but not limited to, sporting events, concerts,  
26 entertainment events, exhibitions, conventions, conferences, meetings,  
27 banquets, civic and community events, social, recreation, or leisure events,  
28 celebrations, and other similar events or activities, including the sale of food

1 and drink for consumption on-site or off-site and the sale of alcoholic beverages  
2 for consumption on-site, the sale of merchandise, souvenirs, and novelties and  
3 similar items, and other uses, events, or activities as are customary and usual  
4 in connection with the operation of such facility.

5 (B) “Event Center Structure” shall mean a multi-purpose facility that  
6 includes an Arena and may include any of the following uses:

7 (1) Professional office;

8 (2) Athletic practice and training facilities;

9 (3) Medical office or outpatient clinic and accessory uses;

10 (4) Other non-Arena uses that support the Arena and are  
11 located in the Event Center Structure.

12 (C) “Event Center Supporting Structure” shall mean a structure  
13 located within the boundaries of the SE Overlay Zone but not within the Event  
14 Center Structure, which may include any of the following uses:

15 (1) Retail uses, including, but not limited to, the sale or rental  
16 of products or services;

17 (2) Dining uses, including restaurants, bars, cafes, catering  
18 services, and outdoor eating areas, including the sale of food  
19 and drink for consumption on-site or off-site and the sale of  
20 alcoholic beverages for consumption on-site;

21 (3) Community-serving uses for cultural, exhibition,  
22 recreational, or social purposes.

23 (D) “Infrastructure and Ancillary Structures and Uses” shall mean any  
24 uses or structures, temporary or permanent, that are Accessory to, reasonably  
25 related to, or maintained in connection with the operation and conduct of an  
26 Event Center Structure or Event Center Supporting Structure, including,  
27 without limitation, open space and plazas, pedestrian walkways and bridges,  
28 transportation and circulation facilities, public or private parking facilities

1 (surface, subsurface, or structured), signage, outdoor theaters, broadcast,  
2 filming, recording, transmission, production and communications facilities and  
3 equipment, and events and activities held or conducted outside of the Event  
4 Center Structure that include, but are not limited to, any event or activity  
5 otherwise permitted in the Event Center Structure.

6 (E) “Sports and Entertainment Complex” shall mean a development  
7 that includes the following:

8 (1) Event Center Structure;

9 (2) Event Center Supporting Structures;

10 (3) Infrastructure and Ancillary Structures and Uses; and

11 (4) Any other uses that the Economic and Community

12 Development Department Director determines are similar,  
13 related, or accessory to the aforementioned uses.

14 (F) "SEC Development Guidelines" shall have the meaning given in  
15 Section 12-38.94.

16 **Section 12-38.92 Applicability**

17 (A) This Article is applicable to the development of a Sports and  
18 Entertainment Complex and a hotel of no fewer than 100, and no greater than  
19 150, guestrooms on properties located in the SE Overlay Zone. Except as  
20 otherwise provided in this Article and/or in the SEC Development Guidelines,  
21 the provisions of the Inglewood Municipal Code (IMC), Chapter 12 (Planning  
22 and Zoning) shall apply. This Article and the SEC Development Guidelines  
23 shall control in the event of a conflict with other provisions of IMC Chapter 12.  
24 In the event of a conflict between this Article and the SEC Development  
25 Guidelines, the SEC Development Guidelines shall control.

26 (B) All other development in the SE Overlay Zone shall be governed by  
27 the applicable provisions of Chapter 12, including the provisions of the  
28 applicable underlying zoning district.

1 **Section 12-38.93 Permitted Uses**

2 The following uses shall be permitted in the SE Overlay Zone and shall  
3 be exempt from the Special Use Permit provisions of Article 25 of this Chapter:

4 (A) A Sports and Entertainment Complex subject to specific  
5 requirements for the following uses:

6 1. **Onsite Sales and Service of Alcoholic Beverages**

7 The onsite (including in the plaza area adjacent to the Event  
8 Center Structure) sale, service, and consumption of alcoholic  
9 beverages, including beer, wine, and distilled spirits, within the  
10 Sports and Entertainment Complex is permitted, subject to  
11 compliance with the following requirements:

- 12 a. Any establishment or operator within the Sports and  
13 Entertainment Complex serving or selling alcoholic  
14 beverages shall maintain the applicable license from the  
15 California Department of Alcohol Beverage Control  
16 ("ABC").
- 17 b. Alcoholic beverages may be purchased, served, or consumed  
18 within any licensed establishment and its designated  
19 outdoor areas and any additional licensed designated areas,  
20 subject to compliance with all applicable ABC license  
21 conditions.
- 22 c. Alcoholic beverages may be sold, served, or consumed from  
23 the hours of 6:00 AM to 2:00 AM.
- 24 d. All persons engaged in the sale or service of alcoholic  
25 beverages shall be at least 18 years old and must  
26 successfully complete a certified training program in  
27 responsible methods and skills for serving and selling  
28

1                   alcoholic beverages with recurrent training not less than  
2                   once every three years.

3                   e. Any areas where alcohol is sold, served or consumed shall  
4                   be monitored by security equipment, security personnel or  
5                   supervisory personnel.

6                   2. **Outdoor Restaurants or Dining Areas**

7                   Outdoor restaurants or dining areas shall be permitted within  
8                   the Sports and Entertainment Complex subject to compliance  
9                   with the following requirements:

10                  a. The perimeter of outdoor dining areas of any establishment  
11                  selling or serving alcoholic beverages shall be defined by  
12                  physical barriers.

13                  b. Vehicle drive-through service, or service windows or order  
14                  pick-up windows along any public right-of-way shall be  
15                  prohibited.

16                  3. **Communications Facilities**

17                  Communications systems, facilities, antennas, and any related  
18                  equipment for the following purposes may be installed, placed,  
19                  or used within the Sports and Entertainment Complex:

20                  a. Broadcasts or transmissions from or related to the  
21                  Sports and Entertainment Complex;

22                  b. Communications with or transmissions to attendees,  
23                  employees, or visitors of the Sports and Entertainment  
24                  Complex;

25                  c. Reception and distribution or exhibition of broadcasts or  
26                  transmissions within the Sports and Entertainment  
27                  Complex;



- d. Operation of on-site equipment, facilities, structures or uses;
- e. Communications related to events and operations within the Sports and Entertainment Complex;
- f. Emergency services and communications; and
- g. Communications services, including telecommunications services, for large-scale events hosted within the Sports and Entertainment Complex.

(B) One (1) hotel of no fewer than 100, and no greater than 150, guestrooms, subject to compliance with Section 12-16.1 except as provided under this Article.

**Section 12-38.94 Sports and Entertainment Complex Development**

**Guidelines and Review**

(A) SEC Development Guidelines. Development of a Sports and Entertainment Complex within the SE Overlay Zone shall be subject to the Sports and Entertainment Complex Design Guidelines and Infrastructure Plan (“SEC Development Guidelines”), adopted by the City Council by Resolution No. \_\_\_\_\_ as the SEC Development Guidelines as may be amended from time to time as provided therein.

(B) Standards, Requirements, and Process. The SEC Development Guidelines establish specific design standards for the development of a Sports and Entertainment Complex within the SE Overlay Zone, the requirements for on-site and off-site Infrastructure to be provided, and the review and permitting process for the Sports and Entertainment Complex and Infrastructure.

(C) SEC Design Guidelines. The SEC Design Guidelines portion of the SEC Development Guidelines, includes, without limitation, standards for site design, features and design elements for buildings and structures, landscaping, signage, and lighting, parking, loading and circulation and sustainability, and

1 shall apply in lieu of any contrary provisions in the Inglewood Municipal Code,  
2 including without limitation the Site Plan Review process in Article 18.1 of this  
3 Chapter.

4 (D) The SEC Infrastructure Plan portion of the SEC Development  
5 Guidelines establishes the infrastructure improvements required to be provided  
6 for the Sports and Entertainment Complex and includes, without limitation,  
7 wet and dry utilities, streets and sidewalks, traffic signals, and City water well  
8 relocation. The SEC Infrastructure Plan shall prevail in the event of any  
9 conflict between it and any provisions in Article 22 (Subdivision Regulations) of  
10 this Chapter. Within the SE Overlay Zone, (a) the provisions of Section 12-66  
11 and Sections 12-66.1 through 12-66.5 are waived and any requirement that a  
12 Tentative Parcel Map precede filing of a Parcel Map shall not apply; (b) Section  
13 12-66.6 requiring a parcel map to be filed and recorded prior to specified  
14 transactions and issuance of building permits is waived and shall not apply; (c)  
15 Section 12-7.1 shall not be applied to require a parcel map prior to issuance of  
16 building permits; and (d) Except as provided above, a parcel map shall be  
17 reviewed and approved in accordance with Section 12-66.5.

18 (E) Review and Approval of SEC Design Drawings and SEC  
19 Improvement Plans.

20 (1) Any application for SEC Design Review under the SEC  
21 Design Guidelines shall be submitted for review and  
22 approval to the Economic and Community Development  
23 Department Director in accordance with the standards and  
24 requirements established in the SEC Development  
25 Guidelines. Such review and approval shall be required  
26 prior to the issuance of any building permit(s) for the  
27 development of a Sports and Entertainment Complex. SEC  
28 Design Review shall not be required for the repair or

1 replacement with the same or comparable type of structural  
2 element or material to any portion of an existing building or  
3 for interior improvements within an existing building  
4 provided that there is no concurrent exterior alteration,  
5 building enlargement or increase in parking needs.

6 (2) Any application for review and approval of SEC  
7 Improvement Plans under the SEC Infrastructure Plan  
8 shall be submitted to the Public Works Director for review  
9 and approval of off-site improvements and to the Economic  
10 and Community Development Department Director for  
11 review and approval of on-site improvements, in accordance  
12 with the standards and requirements established in the  
13 SEC Development Guidelines.

14 (3) SEC Design Drawings and SEC Improvement Plans  
15 submitted under the SEC Development Guidelines shall be  
16 approved unless materially inconsistent with the applicable  
17 standards established in this Article 17.5 and the SEC  
18 Development Guidelines, as more particularly provided  
19 therein.

20 **Section 12-38.95 Development Standards**

21 **Section 12-38.95.1 Setbacks**

22 Front yard, side yard, and rear yard for the Sports and Entertainment Complex  
23 shall conform to the requirements of the SEC Design Guidelines.

24 **Section 12-38.95.2 Height**

25 (A) The Event Center Structure including any appurtenances thereon  
26 shall not exceed one hundred fifty (150) feet in height.

27 (B) Any building or structure other than the Event Center Structure  
28 shall not exceed one hundred (100) feet in height.

1 **Section 12-38.95.3 Street Frontage**

2 Minimum street frontage requirements shall not apply to the  
3 development of permitted uses within the SE Overlay Zone.

4 **Section 12-38.95.4 Lot Size**

5 Minimum lot size requirements shall not apply to the development of  
6 permitted uses within the SE Overlay Zone.

7 **Section 12-38.95.5 Development Limitations**

8 Development of a Sports and Entertainment Complex shall be consistent  
9 with the size standards established in the SEC Design Guidelines.

10 **Section 12-38.95.6 Walls and Fences**

11 (A) Walls and fences within the Sports and Entertainment Complex shall  
12 be consistent with the standards established in the SEC Design  
13 Guidelines.

14 (B) Review and Approval. SEC Design Review Approval of any fence or  
15 wall pursuant to the SEC Design Guidelines shall constitute an  
16 approval and permit from the Planning Division for the purposes of  
17 compliance with Section 12-93.5, Article 24 of this Chapter.

18 **Section 12-38.96 Parking and Loading Requirements**

19 **Section 12-38.96.1 Parking Requirements**

20 The aggregate amount of off-street parking spaces provided and  
21 maintained in connection with each of the following uses shall be not  
22 less than the following, except as may be reduced through the  
23 application of shared parking permitted by Section 12-38.96.2:

24 (A) Event Center Structure. One (1) parking space for each five (5)  
25 seats in the Arena, inclusive of any temporary seating capacity, plus one  
26 (1) space for each three hundred (300) square feet of gross floor area of  
27 Professional office.

1 (B) Event Center Supporting Structures. Sixty (60) parking spaces,  
2 plus one (1) additional parking space for each additional four hundred  
3 (400) square feet of gross floor area in excess of fourteen thousand  
4 (14,000) square feet of gross floor area, based on the combined gross floor  
5 area of all uses within the Event Center Supporting Structures.

6 (C) Hotel. Two (2) parking spaces, plus one (1) parking space for each  
7 bedroom or other room that can be used for sleeping purposes up to  
8 ninety (90) rooms, plus one (1) parking space for each additional two (2)  
9 bedrooms or other rooms that can be used for sleeping purposes in excess  
10 of ninety (90) rooms.

11 (D) No additional parking shall be required for any other uses within  
12 the Event Center Structure described in Section 12-38.91(B) or any  
13 Infrastructure and Ancillary Structures and Uses described in Section  
14 12-38.91(D).

15 **Section 12-38.96.2 Shared Parking**

16 The parking requirements for any Event Center Supporting  
17 Structure or use therein may be satisfied through shared parking of  
18 spaces provided for the Arena use, provided that substantial evidence, as  
19 determined by the Economic and Community Development Department  
20 Director, demonstrates that the peak parking demand for such Event  
21 Center Supporting Structure or use therein does not occur during the  
22 same period as the peak parking demand for the Arena use, or that the  
23 same parking spaces will be used for multiple Sports and Entertainment  
24 Complex uses.

25 **Section 12-38.96.3 Location of Parking**

26 (A) Required parking for the Sports and Entertainment  
27 Complex may be located on any lot or property within the SE Overlay  
28 Zone.

1           (B) The hotel use shall provide and maintain its required on-site  
2 parking in a lot exclusively for the hotel use based on the calculation  
3 described above in Section 12.38.96.1(C).

4 **Section 12-38.96.4 Parking Standards**

5           For the Sports and Entertainment Complex, the provisions of the  
6 SEC Design Guidelines for Parking and Circulation shall apply in lieu  
7 of the design standards and requirements for parking spaces and  
8 facilities set forth in Sections 12-42.1, 12-53, 12-54.4, 12-55.4, and 12-  
9 55.5 of Article 19 of this Chapter.

10 **Section 12-38.96.5 Loading Facilities**

11           (A) Event Center Structure. A minimum of four loading spaces  
12 shall be provided for the Event Center Structure. Loading spaces may  
13 be provided in a below grade structure.

14           (B) Event Center Supporting Structures. A minimum of one  
15 loading space per 10,000 square feet of gross floor area, based on the  
16 combined gross floor area of all Event Center Supporting Structures.

17           (C) For the Sports and Entertainment Complex, the provisions  
18 of the SEC Design Guidelines for Loading shall apply in lieu of the  
19 design standards and requirements for loading set forth in Article 19  
20 of this Chapter.

21 **Section 12-38.97 Signs**

22           (A) In lieu of the standards and requirements regarding signs set forth  
23 in Sections 12-75, 12-76, 12-77 (and subsections thereto), 12-80, and 12-  
24 80.5 of Article 23 of this Chapter, signs for a Sports and Entertainment  
25 Complex in the SE Overlay Zone shall be subject to this Article 17.5.

26           (B) Signs within the Sports and Entertainment Complex shall be  
27 permitted or exempted from the permit requirement of Section 12-72 of  
28 Article 23 of this Chapter, as set forth in the SEC Design Guidelines.

1 (C) Prohibited Signs. Signs that create the following conditions shall  
2 be prohibited:

3 (1) Traffic Safety Hazard. Any sign or device which by design or  
4 location resembles or conflicts with any traffic control sign or device.  
5 Any sign or device that creates a potential safety hazard by  
6 obstructing views of pedestrian and vehicular traffic at street  
7 intersections or driveways or by creating glare or other hazardous  
8 distraction.

9 (2) Infrastructure Hazard. Any sign that is erected within six  
10 (6) feet horizontally or twelve (12) feet vertically of any overhead  
11 electric conductors exceeding seven hundred fifty (750) volts.

12 (D) Review and Approval. SEC Design Review Approval of any sign  
13 pursuant to the SEC Design Guidelines shall constitute a sign approval  
14 and permit from the Planning Division for the purposes of Section 12-72,  
15 Article 23 of this Chapter.

16 An application for review of any sign pursuant to the SEC Design  
17 Guidelines shall include the following information:

18 (1) Location and sign area of each sign;

19 (2) Total signage area;

20 (3) Illumination information including signage refresh rate, scrolling,  
21 brightness, and hours of illumination, as applicable.

22 **Section 12-38.98 Public Art**

23 The provisions of Section 12-4.1 shall not apply to development of  
24 the Sports and Entertainment Complex. The location of any public art to  
25 be provided shall be determined through the SEC Design Review under  
26 the SEC Development Guidelines.

1 **SECTION 4:** The Inglewood Municipal Code Chapter 12, Planning and Zoning,  
2 is hereby amended by adding Section 12-1.76.1, and Section 12-1.104.1, to read  
3 as follows:

4 **Section 12-1.76.1. Sports and Entertainment Complex.**

5 "Sports and Entertainment Complex" shall mean the same as defined in  
6 Section 12-38.91(E).

7 **Section 12-1.104.1. SEC Development Guidelines.**

8 "SEC Development Guidelines" shall mean the same as defined in  
9 Section 12-38.94(A).

10 **SECTION 5: Parking Outside the SE Overlay Zone.** A parking lot, public  
11 parking area, or facility, or any entity providing same, may provide off-street  
12 parking for the Sports and Entertainment Complex, outside the SE Overlay  
13 Zone, notwithstanding any contrary provisions in Inglewood Municipal Code  
14 Chapter 12, Planning and Zoning, Article 19 (Parking Regulations).

15 **SECTION 6: Lot Line Adjustments.** The lot lines of adjacent parcels within  
16 the SE Overlay Zone may be adjusted at the request of the property owners, or  
17 by City on its own initiative as to City owned property, in accordance with the  
18 provisions of Government Code Section 66412(d), and pursuant to the  
19 procedures in this Section. Such action shall be a ministerial approval made by  
20 the Economic and Community Development Department Director, or his or her  
21 designee, who shall approve a lot line adjustment if he or she finds that (i) the  
22 adjusted lot conforms with the general plan and zoning, and (ii) all owners of an  
23 interest in the subject real property have consented to the lot line adjustment.  
24 No conditions or exactions shall be imposed on the approval of the lot line  
25 adjustment except to conform to the general plan, zoning and building  
26 ordinances, to require the prepayment of real property taxes prior to the  
27 approval of the lot line adjustment, or to facilitate the relocation of existing  
28 utilities, infrastructure or easements. No tentative map, parcel map or final



1 map shall be required as a condition to the approval of a lot line adjustment.

2 The adjusted lot lines shall be shown in a recorded notice of merger of lot line  
3 adjustment or a certificate of compliance.

4 **SECTION 7**

5 The City Council concurs with the Planning Commission  
6 recommendation and does hereby approve Zoning Code Amendment No. ZCA-  
7 2020-02, to establish regulations for the Sports and Entertainment Overlay  
8 Zone and adjust other land use controls, as established in Sections 4 through 6  
9 of this ordinance, under the provisions of Chapter 12, Article 27 of the  
10 Inglewood Municipal Code.

11 The City Clerk shall certify to the passage and adoption of this ordinance  
12 and to its approval by the City Council and shall cause the same to be published  
13 in accordance with the City Charter and thirty days from the final passage and  
14 adoption, this ordinance shall be in full force and effect.

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1 This ordinance to amend Chapter 12 of the IMC, to establish regulations for the  
2 Sports and Entertainment Overlay Zone and adjust other land use controls was  
3 introduced by the City Council on the 21<sup>st</sup> day of July 2020, and is passed,  
4 approved and adopted by the City Council of the City of Inglewood this \_\_ day of  
5 July 2020.

6  
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**JAMES T. BUTTS**  
9 **MAYOR OF THE CITY OF**  
10 **INGLEWOOD, CALIFORNIA**

11 **Attest:**

12  
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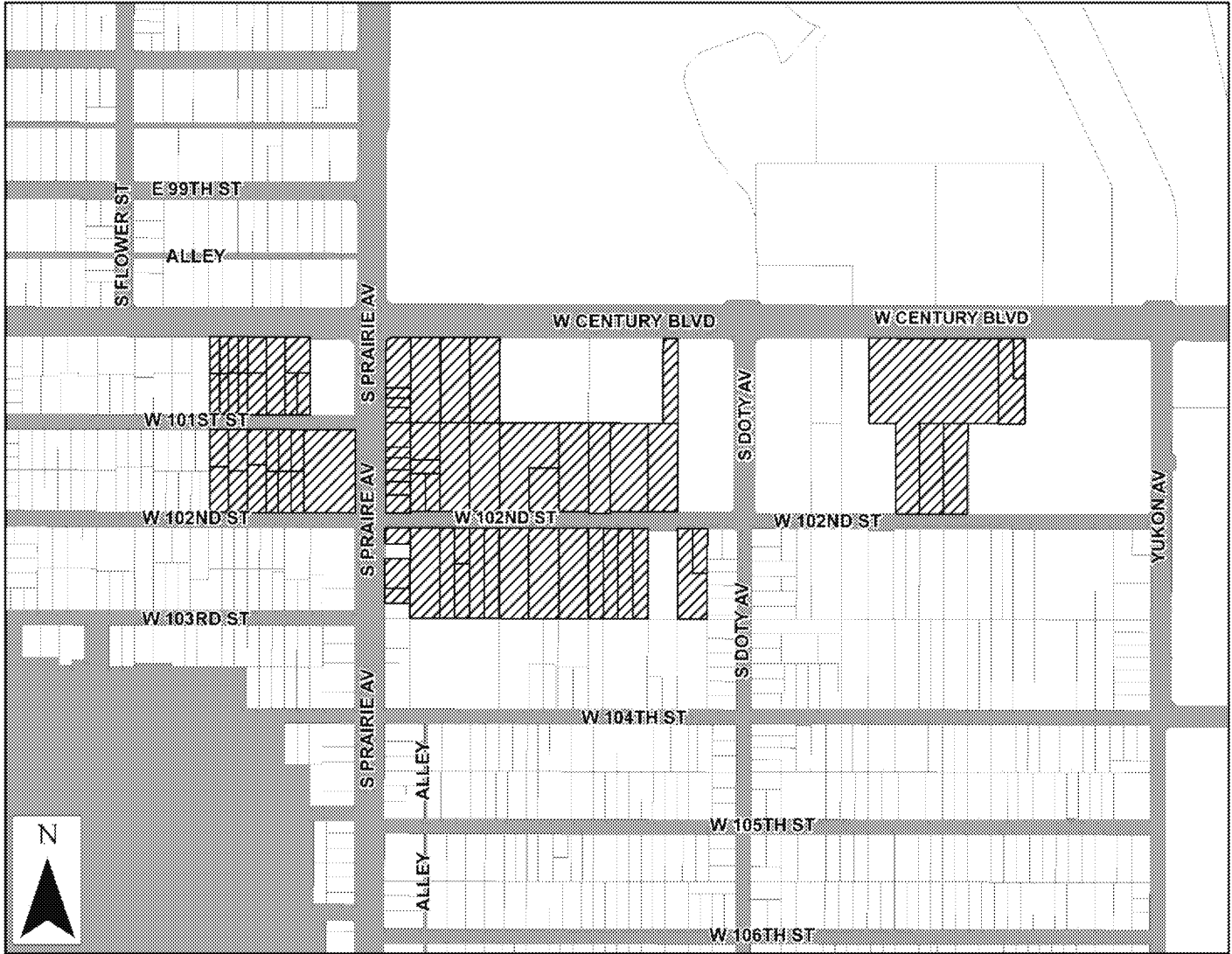
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**YVONNE HORTON**  
15 **CITY CLERK**  
16 **(SEAL)**

ZCA Ordinance

Exhibit A:

IBEC Area Map



City Council Staff Report

Attachment 13:

Draft Inglewood Municipal Code Amendment Ordinance

1                                   ORDINANCE NO. \_\_\_\_\_  
2

3           **AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF**  
4           **INGLEWOOD, CALIFORNIA, APPROVING AMENDMENTS TO**  
5           **CHAPTER 2 (ADMINISTRATION), CHAPTER 3 (MOTOR**  
6           **VEHICLES AND TRAFFIC), CHAPTER 5 (OFFENSES,**  
7           **MISCELLANEOUS), CHAPTER 10 (PUBLIC WORKS), AND**  
8           **CHAPTER 11 (BUILDING REGULATIONS) OF THE**  
9           **INGLEWOOD MUNICIPAL CODE (IMC) TO PERMIT**  
10          **DEVELOPMENT AND OPERATION OF THE INGLEWOOD**  
11          **BASKETBALL AND ENTERTAINMENT CENTER.**

12  
13           **WHEREAS**, Murphy's Bowl, LLC (Project Sponsor), seeks the  
14 development of the Inglewood Basketball and Entertainment Center (IBEC)  
15 that includes an arena intended to promote the enjoyment and recreation of the  
16 public by providing access to the City's residents in the form of spectator sports,  
17 specifically basketball, with up to 18,000 fixed seats to host National Basketball  
18 Association games, and with up to 500 additional temporary seats for other  
19 events such as family shows, concerts, corporate and community events, and  
20 other sporting events; an up to 85,000-square foot team practice and athletic  
21 training facility; up to 71,000 square feet of LA Clippers office space; an up to  
22 25,000-square foot sports medicine clinic; up to 63,000 square feet of ancillary  
23 and related arena uses including retail and dining; an outdoor plaza adjacent to  
24 the arena; parking facilities; relocation of a City of Inglewood groundwater well;  
25 and various circulation, infrastructure, and other ancillary uses (the Project).  
26 The Project will also include a limited-service hotel. The area of the IBEC  
27 Project is shown in Exhibit A; and  
28

1           **WHEREAS**, the matter of the proposed Inglewood Municipal Code  
2 Amendments (IMC Amendments) was presented to the City Council on July 7,  
3 2020, who then scheduled a public hearing for July 21, 2020; and,

4           **WHEREAS**, notice of the time and place of the hearing was given as  
5 required by law; and,

6           **WHEREAS**, the City Council conducted the hearing at the time and place  
7 stated in the notice and afforded all persons interested in the matter of the IMC  
8 Amendments, or in any matter or subject related thereto, an opportunity to be  
9 heard by the City Council and to submit any testimony or evidence in favor or  
10 against the proposed IMC Amendments; and,

11           **WHEREAS**, all applicable procedural requirements for adopting  
12 amendments to the Inglewood Municipal Code have been followed; and

13           **WHEREAS**, the City Council has taken and carefully considered public  
14 testimony and all evidence presented at the public hearing, and the City Council  
15 determined that the IMC Amendments should be made to the text of the  
16 Inglewood Municipal Code, and finds as follows:

17 **SECTION 1.**

18           Pursuant to the California Environmental Quality Act, Public Resources  
19 Code, Section 21000, et seq. (CEQA), the City prepared an Environmental Impact  
20 Report (EIR) for the Inglewood Basketball and Entertainment Center (State  
21 Clearinghouse No. 2018021056), which analyzed environmental impacts of the  
22 proposed project and the associated entitlements, including the IMC  
23 Amendments. Prior to making a decision on the IMC amendments, the City  
24 Council reviewed and considered the EIR and pursuant to Resolution No. \_\_\_\_  
25 (City Council EIR Certification Resolution) certified the EIR, made certain  
26 environmental findings and adopted a Statement of Overriding Considerations  
27 for Significant and Unavoidable Impacts of the Project that would remain even  
28 with the implementation of necessary mitigation measures specified in the EIR

1 (together, the CEQA Findings), and adopted a Mitigation Monitoring and  
2 Reporting Program (MMRP) for the Project.

3 **SECTION 2.**

4 Based on the entirety of the materials before the City Council, including  
5 without limitation, agenda reports to the City Council and Planning Commission;  
6 the EIR and all appendices thereto and supporting information; City Council  
7 Resolution No. \_\_ (EIR Certification Resolution) including the CEQA Findings  
8 and Statement of Overriding Considerations and MMRP attached as Exhibits B  
9 and C thereto; all plans, drawings, and other materials submitted by the Project  
10 Sponsor; minutes, reports, and public testimony and evidence submitted as part  
11 of the Planning Commission's and City Council's duly-noticed meetings regarding  
12 the IBEC Project; the record of proceedings prepared in connection with AB 987  
13 pursuant to Public Resources Code section 21168.6.8; and all other information  
14 contained in the City's administrative record concerning the Project (collectively,  
15 the Record), which it has carefully reviewed and considered, the City Council  
16 finds as follows:

- 17 1) That the proposed IMC Amendments are consistent with the Inglewood  
18 General Plan, the Industrial land use designation, and the Inglewood  
19 International Business Park Specific Plan, as each is amended, for the  
20 reasons set forth in Exhibit D (General Plan Consistency Analysis) to  
21 City Council Resolution No. \_\_ (General Plan Amendment Resolution),  
22 which are incorporated herein by reference, and will support, among  
23 others, the following objectives:
- 24 a. Provide for the orderly development and redevelopment of the City  
25 while preserving a measure of diversity among its parts.
  - 26 b. Help promote sound economic development and increase  
27 employment opportunities for the City's residents by responding to  
28 changing economic conditions.



1 c. Promote Inglewood's image and identity as an independent  
2 community within the Los Angeles metropolitan area.

3 2) That an EIR has been prepared for the IBEC Project, including the  
4 proposed IMC Amendments, and was certified by the City Council  
5 prior to approval of the IMC Amendments. The City Council certified  
6 the EIR and adopted CEQA Findings including a Statement of  
7 Overriding Considerations for significant and unavoidable impacts of  
8 the Project that would remain significant even with the  
9 implementation of all feasible mitigation measures specified in the  
10 EIR, and adopted an MMRP for the Project in accordance with CEQA  
11 as provided in City Council Resolution No. \_\_\_\_ (EIR Certification  
12 Resolution).

13 **SECTION 3.**

14 WHEREAS, at the conclusion of the public hearing, the City Council  
15 determined that the IMC Amendments specified herein should be approved.

16 **NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF INGLEWOOD**  
17 **DOES HEREBY ORDAIN AS FOLLOWS:**

18 **SECTION 4.**

19 Inglewood Municipal Code, Chapter 2 (Administration), Section 2-211.1 is  
20 hereby amended to read as follows:

21  
22 Whenever the City becomes the owner of any real property, other than that  
23 specified by Article VI, Section 2-202 et seq., of the same may be sold in the  
24 manner set forth in this Article. With respect to the sale or other disposition of  
25 City-owned real property within the SE Overlay Zone, whenever owned or  
26 acquired by the City, the City Council affirms and ratifies its determination  
27 that this Article's provisions shall not apply.

28 **SECTION 5.**

1           Inglewood Municipal Code, Chapter 3 (Motor Vehicles and Traffic), Section 3-  
2 85 is hereby amended to read as follows:

3           The following streets or portions of streets are hereby designated as routes the  
4 use of which is permitted by any vehicle exceeding a maximum gross weight of  
5 three tons. The traffic authority is authorized to designate the following streets  
6 as "Truck Routes" by use of appropriate signs where, in his or her opinion, such  
7 designation is required:

- 8 Arbor Vitae Street from West City Limits to La Brea Avenue;
- 9 Aviation Boulevard from Manchester Boulevard to South City Limits;
- 10 Centinela Avenue from West City Limits to Florence Avenue;
- 11 Century Boulevard from West City Limits to East City Limits;
- 12 Crenshaw Boulevard from North City Limits to South City Limits;
- 13 Eucalyptus Avenue from Florence ~~Averole Avenue~~ to Juniper Street;
- 14 Florence Avenue from Manchester Boulevard to East City Limits;
- 15 Hawthorne Boulevard from Century Boulevard to South City Limits;
- 16 Hyde Park Boulevard from Hyde Park Place to East City Limits;
- 17 Hyde Park Place from Centinela Avenue to Hyde Park Boulevard;
- 18 Imperial Highway from West City Limits to East City Limits;
- 19 Juniper Street from Eucalyptus Avenue from La Brea Avenue;
- 20 La Brea Avenue from North City Limits to South City Limits;
- 21 La Cienega Boulevard from North City Limits to South City Limits;
- 22 Manchester Boulevard from West City Limits to East City Limits;
- 23 Prairie Avenue from Florence Avenue to South City Limits;
- 24 102nd Street from **Prairie 325 feet west of the centerline of South Doty Avenue**  
25 to Yukon Avenues.

26 **SECTION 6.**

27           Section 5-24.2 is hereby added to Inglewood Municipal Code, Chapter 5  
28 (Offenses, Miscellaneous), Article 2 (Noise Regulations) as follows:

1 **Section 5-24.2 Noise Regulations in the SE Sports and Entertainment Overlay**  
2 **Zone**

3 The provisions of this Article shall not apply to the construction of a  
4 Sports and Entertainment Complex within the SE Overlay Zone, and shall not  
5 apply to the operation of a Sports and Entertainment Complex within the SE  
6 Overlay Zone for any permitted events or activities, which events or activities  
7 shall be permitted to generate noise levels in excess of those otherwise  
8 permitted in this Article, so long as noise exceeding the limits in Article 2 does  
9 not extend beyond twelve a.m.

10 **SECTION 7.**

11 Inglewood Municipal Code, Chapter 10 (Public Works), Article 12 (Traffic  
12 Demand Management Ordinance), subdivision (1) of Section 10-151 is hereby  
13 amended to read as follows:

14 (1) **Applicability of Requirements.** Prior to approval of any development  
15 project, the applicant shall make provision for, as a minimum, all of the  
16 applicable transportation demand management and trip reduction measures  
17 listed in the sections that follow.

18 This Article shall not apply to projects for which a development  
19 application has been deemed “incomplete” by the City pursuant to Government  
20 Code Section 65943, or for which a Notice of Preparation for a DEIR has been  
21 circulated or for which an application for a building permit has been received,  
22 prior to the effective date of the Ordinance codified in this Article. In addition,  
23 this Article shall not apply to development that is permitted under the  
24 provisions of the SE Overlay Zone, in light of the comprehensive Transportation  
25 Demand Management program imposed as mitigation measures in the  
26 Environmental Impact Report for the IBEC Project, as memorialized in its  
27 Mitigation Monitoring and Reporting Program (MMRP).

28 **SECTION 8.**

1           Inglewood Municipal Code, Chapter 11 (Building Regulations), Article 14  
2 (Public Art for New Construction), Section 11-140 is hereby amended to read as  
3 follows:

4           Whenever the valuation of a new nonresidential private structure and/or  
5 other nonresidential project or public building to be developed in the City of  
6 Inglewood equals or exceeds two hundred fifty thousand dollars (\$250,000.00), the  
7 developer of such project shall provide public art valued as specified in the Master  
8 Fee Schedule in a manner as set forth herein.

9           The provision of public art shall be satisfied by one of the following  
10 methods:

11           (1) Installation of on-site artwork;

12           (2) In-lieu of fee payment;

13           (3) In the SE Overlay Zone the provision of public art may be satisfied by  
14 a combination of (1) and (2) above, or as may be otherwise permitted or calculated  
15 in a development agreement regarding development in the SE Overlay Zone  
16 property between a developer and the City.

17           For the purposes of this Section, project valuation shall be the valuation of  
18 the building or structure as determined by the Building Division for the issuance  
19 of the building permit(s).

20 **SECTION 9.**

21           Inglewood Municipal Code, Chapter 11 (Building Regulations), Article 14  
22 (Public Art for New Construction), Section 11-141 is hereby amended to read as  
23 follows:

24           A developer may satisfy the requirement to provide public art valued as  
25 specified in the Master Fee Schedule by entering into a written agreement with  
26 the City through the Parks, Recreation and Community Services Department, or  
27 for any property located within the Hollywood Park Specific Plan zone or the SE  
28 Overlay Zone, a developer may satisfy the requirement by entering into a

1 statutory development agreement with the City, to provide for the installation and  
2 maintenance of on-site artwork in accordance with the City's standards and  
3 guidelines or as otherwise provided in the development agreement. After entering  
4 into such agreement, the Parks, Recreation and Community Services Department  
5 (or, in the case of the Hollywood Park Specific Plan zone or the SE Overlay Zone,  
6 the City Clerk) shall notify the Building Division of such agreement and that no  
7 in-lieu fee payment will be required when the building permit is issued for the  
8 subject project.

9 **SECTION 10.**

10 Inglewood Municipal Code, Chapter 11 (Building Regulations), Article 14  
11 (Public Art for New Construction), Section 11-142 is hereby amended to read as  
12 follows:

13 If the developer of a project does not wish to enter into an agreement  
14 with the City of Inglewood to install artwork on-site, the developer may satisfy  
15 the obligation to provide public art by paying an in-lieu fee at the time the  
16 building permit is issued for the project by the Building Division **except that as**  
17 **to property within the SE Overlay Zone that is subject to a development**  
18 **agreement between a developer thereof and the City, the public art fee shall be**  
19 **paid or satisfied at the time and in the manner provided in the development**  
20 **agreement.** The in-lieu fee shall be as specified in the Master Fee Schedule,  
21 and shall be deposited into the City of Inglewood Public Art Fund established  
22 to finance public art projects and to place public artwork in the community.

23 **SECTION 11**

24 The City Council hereby approves the IMC Amendments to Chapters 2, 3,  
25 5, 10, and 11 specified herein.

26 The City Clerk shall certify to the passage and adoption of this ordinance  
27 and to its approval by the City Council and shall cause the same to be published  
28

1 in accordance with the City Charter and thirty days from the final passage and  
2 adoption, this ordinance shall be in full force and effect.

3 This ordinance to amend Chapters 2, 3, 5, 10, and 11 of the IMC was  
4 introduced by the City Council on the 21<sup>st</sup> day of July 2020, and is passed,  
5 approved and adopted by the City Council of the City of Inglewood this \_\_ day of  
6 July 2020.

7  
8  
9 **JAMES T. BUTTS**  
10 **MAYOR OF THE CITY OF**  
11 **INGLEWOOD, CALIFORNIA**

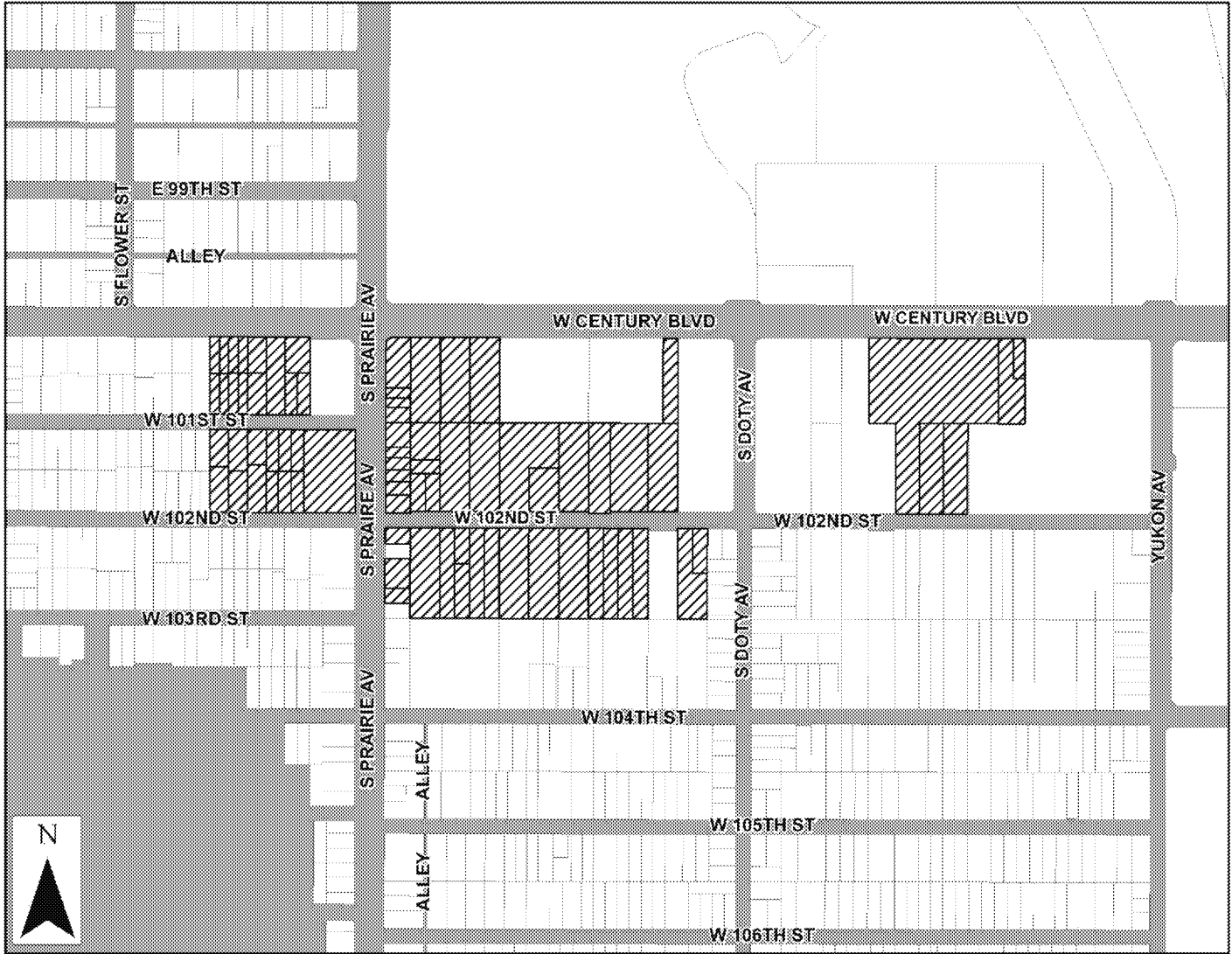
12 **Attest:**

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14  
15  
16 **YVONNE HORTON**  
17 **CITY CLERK**  
18 **(SEAL)**

IMC Amendments Ordinance

Exhibit A:

IBEC Area Map





City Council Staff Report

Attachment 14:

Draft Development Guidelines Resolution

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RESOLUTION NO. \_\_\_\_\_

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF  
INGLEWOOD, CALIFORNIA, ADOPTING SPORTS AND  
ENTERTAINMENT COMPLEX DESIGN GUIDELINES AND  
INFRASTRUCTURE PLAN (SEC DEVELOPMENT  
GUIDELINES) FOR THE INGLEWOOD BASKETBALL AND  
ENTERTAINMENT CENTER.**

WHEREAS, Murphy’s Bowl, LLC (Project Sponsor), seeks the development of the Inglewood Basketball and Entertainment Center (IBEC) that includes an arena intended to promote the enjoyment and recreation of the public by providing access to the City’s residents in the form of spectator sports, specifically basketball, with up to 18,000 fixed seats to host National Basketball Association games, and with up to 500 additional temporary seats for other events such as family shows, concerts, corporate and community events, and other sporting events; an up to 85,000-square foot team practice and athletic training facility; up to 71,000 square feet of LA Clippers office space; an up to 25,000-square foot sports medicine clinic; up to 63,000 square feet of ancillary and related arena uses including retail and dining; an outdoor plaza adjacent to the arena; parking facilities; relocation of a City of Inglewood groundwater well; and various circulation, infrastructure, and other ancillary uses (the Project). The Project will also include a limited service hotel. The area of the IBEC Project is shown in Exhibit A; and

WHEREAS, implementation of the Project necessitates a Zone Change (No. 2020-001) and Zoning Code Amendment (No. 2020-002) including establishing a Sports and Entertainment Overlay Zone, rezoning certain parcels, and establishing regulations for the Sports and Entertainment Overlay Zone and adjustment of other land use controls, as more particularly described in Ordinance No. \_\_\_\_ (Zone Change) and Ordinance No. \_\_\_\_ (Zoning Code Amendment); and

1           WHEREAS, the City seeks to ensure consistent design approach, high  
2 standards of design and that the Project's new development is visually compatible  
3 with and complementary to its site and surroundings, and therefore Project-  
4 specific design guidelines and a plan review process are proposed for the Project,  
5 which are referred to as the Sports and Entertainment Complex Design  
6 Guidelines and Infrastructure Plan (SEC Development Guidelines); and

7           WHEREAS, the Sports and Entertainment Complex Design Guidelines and  
8 Infrastructure Plan (SEC Development Guidelines) will implement aspects of the  
9 Sports and Entertainment Overlay Zone proposed for the Project site; and

10           WHEREAS, on May 1, 2020, the Economic and Community Development  
11 Department Director of the City of Inglewood directed Planning Division staff to  
12 prepare various Project approval materials, including the Sports and  
13 Entertainment Complex Design Guidelines and Infrastructure Plan (SEC  
14 Development Guidelines), and schedule a public hearing before the Planning  
15 Commission; and

16           WHEREAS, the proposal was set for a duly-noticed public hearing  
17 before the Planning Commission in the City Council Chambers, Ninth Floor,  
18 of the Inglewood City Hall, on the 17th day of June 2020, beginning at the hour  
19 of 7:00 p.m.; and

20           WHEREAS, on June 17, 2020, the Planning Commission conducted the  
21 duly-noticed hearing at the time and place stated above and afforded all persons  
22 interested in the matter of the Sports and Entertainment Complex Design  
23 Guidelines and Infrastructure Plan (SEC Development Guidelines), or any matter  
24 or subject related thereto, an opportunity to be heard by the Planning Commission  
25 and to submit any testimony or evidence in favor or against the proposed Sports  
26 and Entertainment Complex Design Guidelines and Infrastructure Plan (SEC  
27 Development Guidelines); and

28

1           WHEREAS, pursuant to the California Environmental Quality Act, Public  
2 Resources Code, Section 21000 et seq. (CEQA), including without limitation  
3 Section 21168.6.8, the City prepared an Environmental Impact Report (EIR) for  
4 the Project, including the SEC Development Guidelines, (State Clearinghouse No.  
5 2018021056), which analyzed environmental impacts of the proposed Project.  
6 Prior to making a recommendation on the Project (including the SEC  
7 Development Guidelines), the Planning Commission reviewed and considered the  
8 EIR and recommended that the City Council certify the EIR, make certain  
9 environmental findings and adopt a Statement of Overriding Considerations for  
10 significant and unavoidable impacts of the Project that would remain even with  
11 the implementation of necessary mitigation measures (together, the CEQA  
12 Findings), and adopt a Mitigation Monitoring and Reporting Program for the  
13 Project; and

14           WHEREAS, the Planning Commission considered the SEC Development  
15 Guidelines and testimony and information received at the public hearing relating  
16 to the Project, including without limitation the oral and written reports from City  
17 staff, oral reports from City consultants, and the EIR. After taking public  
18 testimony and fully considering all the issues, the Planning Commission  
19 determined that the proposed Sports and Entertainment Complex Design  
20 Guidelines and Infrastructure Plan (SEC Development Guidelines) should be  
21 recommended for approval to the City Council and approved Resolution No. 1872  
22 entitled:

23  
24           **A RESOLUTION OF THE PLANNING COMMISSION OF**  
25           **THE CITY OF INGLEWOOD, CALIFORNIA,**  
26           **RECOMMENDING THAT THE CITY COUNCIL FOR**  
27           **APPROVAL SPORTS AND ENTERTAINMENT COMPLEX**  
28           **DESIGN GUIDELINES AND INFRASTRUCTURE PLAN**  
              **(SEC DEVELOPMENT GUIDELINES) FOR THE**  
              **INGLEWOOD BASKETBALL AND ENTERTAINMENT**  
              **CENTER.**

1  
2 WHEREAS, the matter of the proposed SEC Development Guidelines  
3 was presented to the City Council on July 7, 2020 who then scheduled a public  
4 hearing for July 21, 2020; and,

5 WHEREAS, notice of the time and place of the hearing was given as  
6 required by law; and,

7 WHEREAS, the City Council conducted the public hearing at the time and  
8 place stated above and afforded all persons interested in the matter of the SEC  
9 Development Guidelines, or any matter or subject related thereto, an opportunity  
10 to be heard by the City Council and to submit any testimony or evidence in favor  
11 of or against the SEC Development Guidelines.

12 **SECTION 1.**

13 NOW, THEREFORE, BE IT RESOLVED by the City Council of the City  
14 of Inglewood, California, that the City Council has carefully considered all  
15 testimony and evidence presented in this matter, and being advised finds as  
16 follows:

17 Based on the entirety of the materials before the City Council, including  
18 without limitation, agenda reports to the City Council and the Planning  
19 Commission; the EIR and all appendices thereto and supporting information;  
20 Planning Commission Resolution No. 1872; City Council Resolution No.  
21 \_\_\_\_\_ (EIR Certification Resolution) including the CEQA Findings and  
22 Statement of Overriding Considerations and MMRP attached as Exhibits B  
23 and C thereto; all plans, drawings, and other materials submitted by the  
24 Project Sponsor; minutes, reports, and public testimony and evidence  
25 submitted as part of the Planning Commission's and City Council's duly-  
26 noticed meetings regarding the IBEC Project; the record of proceedings  
27 prepared in connection with the requirements of AB 987 pursuant to Public  
28 Resources Code section 21168.6.8; and all other information contained in the

1 City's administrative record concerning the Project (collectively, the Record),  
2 which it has carefully reviewed and considered, the City Council finds as  
3 follows:

4 1. That the foregoing Recitals are true and correct and made a part  
5 of this Resolution.

6 2. That all procedural requirements for the Planning Commission to  
7 recommend approval of, and for the City Council to approve, the Sports and  
8 Entertainment Complex Design Guidelines and Infrastructure Plan (SEC  
9 Development Guidelines) have been followed.

10 3. That the Sports and Entertainment Complex Design Guidelines  
11 and Infrastructure Plan (SEC Development Guidelines) establish appropriate  
12 development standards for the efficient and orderly development of the Project  
13 and adoption of the Sports and Entertainment Complex Design Guidelines and  
14 Infrastructure Plan (SEC Development Guidelines) is reasonably related to  
15 protection of the public health, safety and welfare, as further described in the  
16 City Council Agenda Report and City Council Resolution No. \_\_\_\_ (EIR  
17 Certification Resolution), which includes a Statement of Overriding  
18 Considerations.

19 4. That the Basic Site Plan Drawings referenced in the SEC  
20 Development Guidelines were included in the record before the Planning  
21 Commission as an attachment to the Planning Commission Agenda Report,  
22 and are attached in the same form to the City Council Agenda Report.

23 5. That as described in Exhibit D (General Plan Consistency  
24 Findings) to City Council Resolution No. \_\_\_\_ (General Plan Amendment  
25 Resolution), which is incorporated by reference as though fully set forth herein,  
26 the Sports and Entertainment Complex Design Guidelines and Infrastructure  
27 Plan (SEC Development Guidelines) is consistent with the Inglewood General  
28

1 Plan, the Industrial land use designation, and the Inglewood International  
2 Business Park Specific Plan, as each is amended.

3         6.         An EIR has been prepared for the Project, including the proposed  
4 Sports and Entertainment Complex Design Guidelines and Infrastructure  
5 Plan (SEC Development Guidelines). Prior to final approval of the SEC  
6 Development Guidelines, the City Council certified the EIR and adopted CEQA  
7 Findings including a Statement of Overriding Considerations for significant  
8 and unavoidable impacts of the Project that would remain even with  
9 implementation of feasible mitigation measures specified in the EIR, and  
10 MMRP for the Project in accordance with CEQA as provided in City Council  
11 Resolution No. \_\_\_\_ (EIR Certification Resolution).

12 **SECTION 2.**

13         BE IT FURTHER RESOLVED, that pursuant to the foregoing  
14 recitations and findings, the City Council of the City of Inglewood, California,  
15 hereby approves the SEC Development Guidelines as set forth in Exhibit "B"  
16 attached hereto.

17 **SECTION 3.**

18         The City Clerk shall certify to the passage and adoption of this resolution  
19 and to its approval by the City Council and this Resolution shall be in full force  
20 and effect immediately upon adoption.

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1           This resolution to approve the SEC Development Guidelines is passed,  
2 approved and adopted this 21<sup>st</sup> day of July 2020.

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**James T. Butts**  
**Mayor**

**ATTEST:**

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**Yvonne Horton**  
**City Clerk**

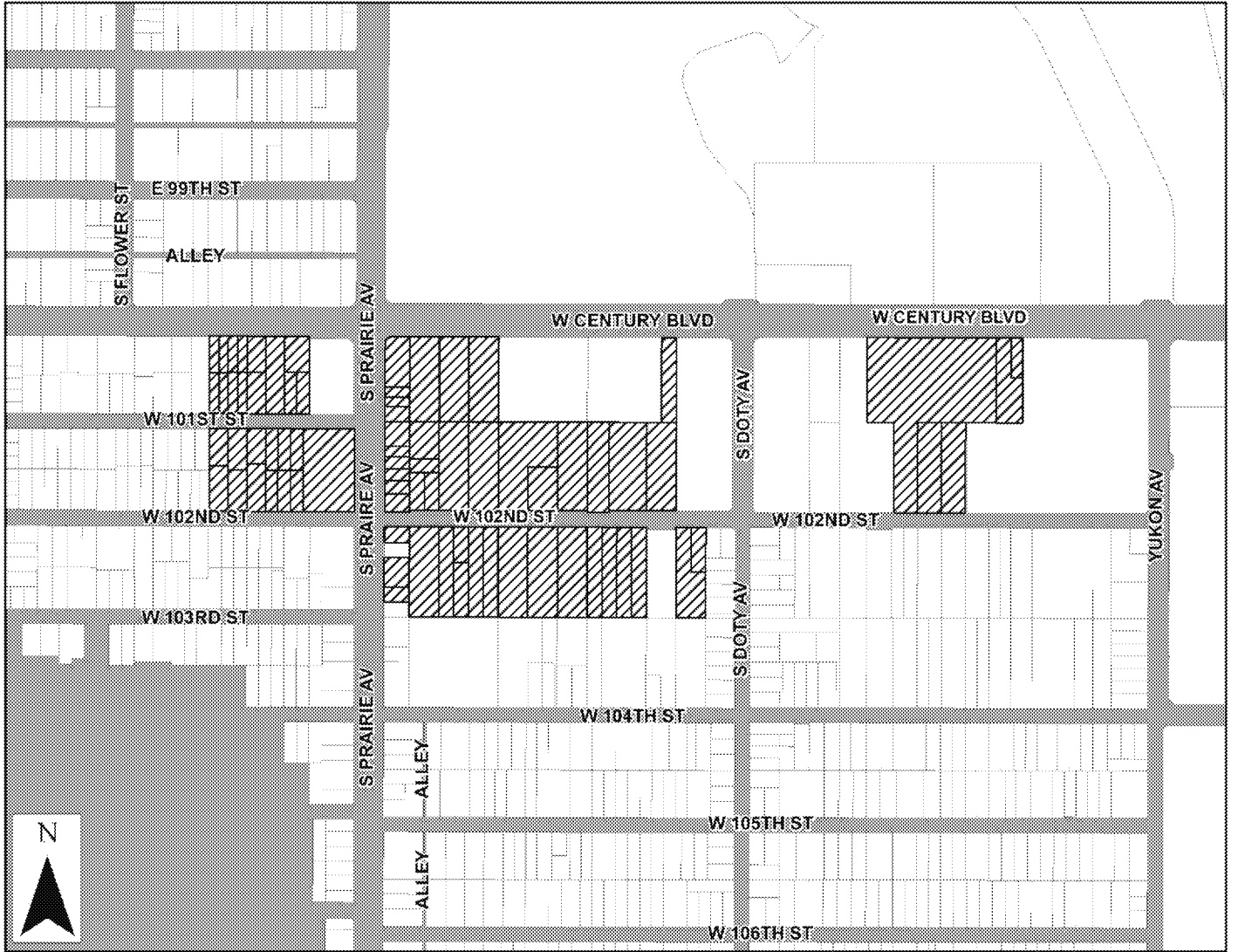


DG Resolution

Exhibit A:

IBEC Area Map

Exhibit A



DG Resolution

Exhibit B:

Sports and Entertainment Complex Design Guidelines  
and Infrastructure Plan

# Sports and Entertainment Complex Design Guidelines and Infrastructure Plan ("SEC Development Guidelines")

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# Sports and Entertainment Complex Design Guidelines and Infrastructure Plan (SEC Development Guidelines)

## PART 1            IMPLEMENTATION AND ADMINISTRATION Section 1        Introduction

The Sports and Entertainment Complex Design Guidelines and Infrastructure Plan (the "SEC Development Guidelines") provide the framework for design review for the development of the Sports and Entertainment Complex, as defined in the Sports and Entertainment Overlay Zone (the "SE Overlay Zone"), adopted by Ordinance No. \_\_\_\_\_, and as established in Article 17.5 of the Inglewood Municipal Code ("IMC"), and for review of the infrastructure improvements required to serve the Sports and Entertainment Complex ("Infrastructure"), within the SE Overlay Zone and right-of-way in the vicinity. The Sports and Entertainment Complex and associated Infrastructure shall be developed in accordance with and within the limitations established in these SEC Development Guidelines.

### 1.1    Organization and Content

The SEC Development Guidelines consists of three Parts.

Part I establishes the processes and procedures to implement the SEC Development Guidelines, including application requirements, review process, and modification processes, applicable to both the SEC Design Guidelines (Part II) and the SEC Infrastructure Plan (Part III).

Part II contains the SEC Design Guidelines. The SEC Design Guidelines establish both required development standards, and other design guidelines and design options for the development of a Sports and Entertainment Complex within the SE Overlay Zone.

Part III contains the SEC Infrastructure Plan. The SEC Infrastructure Plan describes the Infrastructure improvements (wet and dry utilities, fire safety and street right of way improvements required to serve the Sports and Entertainment Complex. No other Infrastructure is required except as described in the SEC Infrastructure Plan.

### 1.2    Applicability

The SE Overlay Zone establishes particular controls that apply to the Spots and Entertainment Complex (Project), in lieu of corresponding or conflicting provisions of the Planning and Zoning Code. The SEC Development Guidelines replace and supersede any corresponding or conflicting provisions of the IMC or City of Inglewood Development Standards and Guidelines or any other corresponding or conflicting design, development or infrastructure standards adopted by the City of Inglewood. In the case of a conflict between the applicable rules governing development in the Inglewood Municipal Code and the spirit, intent, or requirements of the SE Overlay Zone or the SEC Development Guidelines, the SE Overlay Zone and the SEC Development Guidelines shall control. In the event of a conflict between the SE

Overlay Zone and the SEC Development Guidelines, the SEC Development Guidelines shall control. In the case of regulations for which the Design Guidelines are silent, the IMC regulations shall apply.

The SEC Development Guidelines are to be read and applied in conjunction with and implement the Project Approvals (as defined in the Development Agreement By and Between The City of Inglewood and Murphy's Bowl LLC, adopted by Ordinance No. \_\_\_\_, the "Development Agreement"), including the SE Overlay Zone and the Basic Site Plan Drawings for the Sports and Entertainment Complex ("Basic Site Plan Drawings"), attached as Attachment No. 2 to the City Council Staff Report dated July 21, 2020. The Project Approvals, including the applicable provisions of the Mitigation Monitoring and Reporting Plan (the "IBEC MMRP"), adopted as part of the Project Approvals, control over conflicting provisions in the SEC Development Guidelines.

### 1.3 Interpretation

References herein to the Code or Planning and Zoning Code include the controls established under the SE Overlay Zone. The SEC Development Guidelines implement those controls with more detailed design standards and guidelines.

The City has determined that the Basic Site Plan Drawings conform to the requirements of the Project Approvals, including the SEC Development Guidelines.

Where noted, graphics, figures, and photographs provided in this document are conceptual and should be considered guidance to meet the intent of the SEC Development Guidelines. As the design process is iterative, changing and complex by nature, the guideline drawings leave room for necessary architectural creativity, flexibility and design evolution. This flexibility is structured, but not prescribed. Accordingly, actual design of the Sports and Entertainment Complex building/structures, and all supplementary treatments may be different from the images provided in the SEC Development Guidelines where not materially inconsistent with the Project Approvals, the Basic Site Plan Drawings, the SEC Development Guidelines or previously obtained Subsequent Approvals (as defined the Development Agreement). Variations of specific design conditions or features, where proposed by Developer, may be considered where they provide an equal or higher level of design quality as determined by the Economic and Community Development Director or Public Works Department Director, as applicable.

Required standards in the SEC Development Guidelines are preceded by the words such as "must" "shall" or identified as "prohibited". SEC Development that are more subjective, and set forth general design intent, design expectations, and are considered to be generally preferred, encouraged or discouraged features, are preceded by the words such as "should" "encouraged", "preferred", "recommended", or "appropriate". Inclusion in these elements in the design is considered voluntary. The design should consider such guidelines in good faith, recognizing that achieving consistency with many (though not all) such encouraged guidelines may be subjective or subject to external conditions or factors, or may be achieved through a variety of strategies. Items that include one or more criteria or elements that are qualified with the words "discouraged", "inappropriate" or "should not" be included, are acceptable if they are not materially inconsistent with the Project Approvals. Other design elements that are considered to be allowed, but not specifically encouraged or discouraged, are preceded by the word "may" or identified as "allowed" or "allowable". Accordingly, specific treatments, materials, or design details may vary from the SEC Development Guidelines where the standards of the SE Overlay Zone and the intent of the SEC Development Guidelines are met. Design options have been provided to allow for



a range of solutions that meet the larger vision of the Project and should be used as reference for the design intent specified in the caption or section.

#### 1.4 Consultation

During the preparation of any materials to be submitted to the City under these SEC Development Guidelines as set forth below, the City and Developer shall, at the request of and as deemed necessary by the City, hold regular progress meetings to coordinate the preparation of, submission to, and review of the application by the City. The City and Developer shall communicate and consult informally as frequently as is necessary to ensure that the formal submittal of any application to the City can receive prompt and speedy consideration.

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## Section 2      SEC Design Review

Compliance with Part II of the SEC Development Guidelines, the SEC Design Guidelines, shall be achieved through the SEC Design Review process set forth in this Section.

### 2.1      SEC Design Review

The SEC Design Review process shall assure that development of a Sports and Entertainment Complex within the SE Overlay Zone is not materially inconsistent with the intent, policies and requirements of, the Project Approvals, including the SE Overlay Zone, the SEC Design Guidelines and the Basic Site Plan Drawings, recognizing that the SEC Design Guidelines provide for the further evolution of the Project Design in accordance herewith.

#### 2.1.1    Authority

SEC Design Review shall be conducted by the Director of the City of Inglewood Economic and Community Development Department (the "Director").

#### 2.1.2    SEC Design Review Required

SEC Design Review and approval pursuant to the SEC Design Guidelines shall be required prior to the issuance of a building permit for the construction of any Sports and Entertainment Complex structure, facility, fence, wall, or installation of any sign.

SEC Design Review is not required for the repair or replacement with the same or comparable type of structure element or material to any portion of an existing building, or the installation of interior partition within an existing building provided that there is no concurrent exterior alternation, building enlargement, or increase in parking needs.

### 2.2      SEC Design Review Application

#### 2.2.1    Application Requirements

(A) An application for SEC Design Review shall include the following SEC Design Drawings, as applicable:

- (i) Design drawings, which shall include: Architectural drawings, drawn to scale, including site plan, floor plans, all elevations of the proposed structures as they will appear upon completion, roof plan, sections, and landscape/hardscape plan. The drawings shall include a well-defined architectural concept, showing vehicular circulation and access points, amounts and location of parking, location and size of all buildings (including height and perimeter dimensions), pedestrian circulation, and architectural character.
- (ii) Landscape plans, drawn to scale, showing the location and design of landscaped areas and the varieties and sizes of plant materials to be planted therein, and other landscape features.

- (iii) Scale drawings of all signs and graphic displays showing the sign type, size, location, material, colors, and illumination, if any, total signage area, and any other information necessary to demonstrate compliance with the SE Overlay Zone or the SEC Design Guidelines.
  - (iv) A completed SEC Design Review Checklist, in the format described in Section 2.2.2.
- (B) The Director may reasonably request additional information if necessary to determine that proposed development is not materially inconsistent with the SEC Design Guidelines and other Project Approvals or may authorize omission of any generally required materials if they are not necessary to the purpose or scope of the particular SEC Design Review.
- (C) All application materials shall be filed in duplicate, with an electronic copy provided in the format requested by the City.

### 2.2.2 SEC Design Review Checklists

The SEC Design Review Checklists for each section specify how the SEC Design Drawings respond to where applicable SEC Design Guidelines are identified as either required, encouraged, or where design options or considerations are permitted or allowed.

SEC Design Review Checklists for each section of the SEC Design Guidelines are attached to the SEC Development Guidelines as Appendix A. The items on the checklist may be modified, augmented, or omitted, or the format of the checklist may be modified, to improve the SEC Design Review process, on initiation of the Director in consultation with the Developer, or by Developer submitting proposed changes to the Director for review and approval.

## 2.3 SEC Design Review Process

### 2.3.1 Review

The Director, or designee, shall review any SEC Design Review request (or resubmitted request) and shall make a determination of whether the application is complete within ten (10) City business days after the date an application is submitted. If no determination of completeness or incompleteness is made within said 10-day period, the application shall be deemed complete.

### 2.3.2 Approval

The Director shall review and approve or approve with required modifications an application for SEC Design Review within fifteen (15) City business days of notice of submittal of a complete application, or the date the application is deemed complete as provided above.

The Director's review shall be limited to a determination that the SEC Design Drawings are not materially inconsistent with the Project Approvals, including the SE Overlay Zoning, the SEC Design Guidelines and Basic Site Plan Drawings, any Developer proposed and approved changes to the Project Approvals or SEC Design Guidelines, or previously approved SEC Design Drawings

or other previously approved Subsequent Approvals (as defined in the Development Agreement).

No other City of Inglewood permits or approvals shall be required other than final grading, building and improvement permits or as may be required under the IBEC MMRP.

### 2.3.3 Disapproval

Any design review disapproval of the SEC Design Drawings shall state in writing with specificity the reasons for disapproval and any changes which the Director requests to be made. Such reasons and such changes must be consistent with the Approvals (as defined in the Development Agreement), including the SE Overlay Zoning and these SEC Design Guidelines, and such approval shall not be withheld if such changes logically evolve from the Basic Site Plan Drawings or any previously approved SEC Design Drawings or previously approved Subsequent Approvals. Developer, upon receipt of a disapproval based upon powers reserved by the Director hereunder, shall revise and resubmit the SEC Design Drawings to the City consistent with the overall Schedule of Performance, Attachment 4 to the DDA.

### 2.3.4 Appeals

In the event the Developer does not concur with the disapproval of the SEC Design Drawings, or a condition imposed upon the approval of the SEC Design Drawings, the Developer may appeal the determination, interpretation or condition, by filing a written notification of appeal with the Director. The City Council shall consider the appeal at its next regular meeting held not less than thirty (30) calendar days after the filing of the appeal.

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## Section 3      SEC Infrastructure Review

Compliance of Infrastructure improvement plans ("SEC Improvement Plans") with the SEC Infrastructure Plan, Part III of this SEC Development Guidelines, shall be achieved through the SEC Infrastructure Improvement Plans review process set forth in this Section.

### 3.1      Infrastructure Plan Review

The City shall approve the SEC Improvement Plans that are not materially inconsistent with the SEC Infrastructure Plan. No Infrastructure improvements shall be required in addition to or that are inconsistent with those described in the SEC Infrastructure Plan.

#### 3.1.1    Authority

Review and approval of SEC Improvement Plans under the SEC Infrastructure Plan shall be conducted by the City of Inglewood Department of Public Works Director and/or the Director, as appropriate to their applicable jurisdiction.

### 3.2      SEC Infrastructure Plan Application

#### 3.2.1    Application Requirements

An application for SEC Infrastructure Plan review shall include the following:

- (A) SEC Improvement Plans drawings.
- (B) The Department of Public Works Director (or the Director, if applicable) may reasonably request additional information if necessary to determine that proposed development is not materially inconsistent with the SEC Infrastructure Plan and Project Approvals, including previously approved SEC Improvement Plans or previously approved Subsequent Approvals, or may authorize omission of any generally required materials if they are not necessary.
- (C) All application materials shall be filed in duplicate, with an electronic copy provided in the format requested by the City.

### 3.3      SEC Infrastructure Plan Review Process

#### 3.3.1    Application and Completeness

The Public Works Director (and/or the Director, if applicable) shall review any application or submittal for review of SEC Improvement Plans, submitted under the SEC Infrastructure Plan, and shall determine whether the application is complete within ten (10) City business days after the date an application is submitted. If no determination of completeness or incompleteness is made within said 10-day period the application shall be deemed complete.

### 3.3.2 Review and Approval

The Director of Public Works (and/or the Director, if applicable) shall review and approve submittals of SEC Improvement Plans within twenty (20) City business days of notice of submittal of a complete application, or the date the application is deemed complete as provided above unless the Director of Public Works (or the Director, if applicable) determines that the SEC Improvement Plans or other materials are materially inconsistent with the Project Approvals, including the SEC Infrastructure Plan and Basic Site Plan Drawings, proposed and approved changes to the Project Approvals, including to the SEC Infrastructure Plan, or previously approved SEC Improvement Plans or other Subsequent Approvals. No public hearing shall be required in connection with the Director of Public Works' review and determination.

### 3.3.3 Disapproval

Any disapproval shall state in writing with specificity the reasons for disapproval and any changes which the Director of Public Works (or Director, if applicable) requests to be made. Such reasons and such changes must be consistent with the Project Approvals, including the SEC Infrastructure Plan and shall not be withheld if such changes logically evolve from the Basic Site Plan Drawings or any previously approved SEC Improvement Plans or other previously approved Subsequent Approvals.



## Section 4      Amendment and Modification

### 4.1      Revisions to SEC Design Drawings or SEC Improvement Plans

#### 4.1.1      Revisions to approved SEC Design Drawings or SEC Improvement Plans

Revisions to the SEC Design Drawings or to SEC Improvement Plans may be requested by the Developer and shall be reviewed and approved in the same manner as the approved SEC Design Drawings and SEC Improvement Plans. Amendments to SEC Design Drawings and SEC Improvement Plans that are not materially inconsistent with the SEC Design Guidelines or SEC Infrastructure Plan, as applicable, or other Project Approvals, including any previously approved amendments thereto, shall not require an amendment to the SEC Development Guidelines.

#### 4.1.2      Amendments to SEC Design Guidelines and SEC Infrastructure Plan

The Developer may desire to further specify, modify, or expand the plans described in the SEC Design Guidelines or SEC Infrastructure Plan, after their adoption, based upon more precise planning, changes in market demand, and other factors. In such event, the City shall cooperate with Developer to expeditiously review and take final action on such requested changes consistent with the Approvals as defined in the Development Agreement, including the SE Overlay Zone.

#### 4.1.3      Substantive Amendment

A "Substantive Amendment" means any proposed change to the SEC Design Guidelines or SEC Infrastructure Plan that would substantially alter the rights, benefits or requirements of the Project Approvals or substantially alter the maximum height, intensity of use, bulk or size of the Sports and Entertainment Complex.

A Substantive Amendment to the SEC Design Guidelines shall be approved by the City Council after review and recommendation by the Director. The Director shall seek the review and recommendation of the Director of Public Works prior to submitting a SEC Infrastructure Plan amendment to the City Council.

#### 4.1.4      Minor Amendment

A "Minor Amendment" is any amendment other than a Substantive Amendment, provided that the Director (or Director of Public Works as to a Minor Amendment to the SEC Infrastructure Plan) finds that, on the basis of substantial evidence, there are practical reasons or benefits of improved design which justify the prescribed changes, the changes, including any conditions to such amendment, are substantially equivalent to, more effective than, will provide substantially equal or greater benefit to the Project, or will expand on the intent of the SEC Development Guidelines, and will not cause harm or prejudice to adjacent properties, and is not otherwise in conflict with the objectives or intent of the SEC Design Guidelines or SEC Infrastructure Plan, as applicable.

A Minor Amendment to the SEC Design Guidelines shall be approved by the Director without a public hearing. A Minor Amendment to the SEC Infrastructure Plan shall be approved by the Director of Public Works, without a public hearing.

A proposed minor amendment to the SEC Design Guidelines, or proposed minor amendment to the SEC Infrastructure Plan shall be expeditiously reviewed and approved by the Director within ten (10) City business days of filing. A determination by the Director with respect to a proposed Minor Amendment may be appealed by the Developer to the City Council.

With regards to any change that is approved by City, the references in the SEC Development Guidelines shall be deemed to refer to the SEC Development Guidelines as so changed.

A Substantive Amendment to this Part I of the SEC Development Guidelines shall be approved by the City Council on recommendation of the Director. A Minor Amendment to this Part I may be approved by the Director without a public hearing.

### 4.2 Cooperation

If any revisions or corrections to the SEC Design Guidelines, or to SEC Design Drawings or to the SEC Infrastructure Plan or SEC Improvement Plans reviewed or approved by the City, shall be required to conform to the requirements of any other government official, agency, department, or bureau having jurisdiction over the development of the Sports and Entertainment Complex or required SEC Infrastructure, or portion thereof, Developer and the City shall cooperate in efforts to (i) revise or correct the SEC Design Guidelines or SEC Infrastructure Plan, or the applicable SEC Design Drawings or SEC Improvement Plans, in order to comply with the required revision or correction of such government official, agency, department, or bureau, (ii) obtain a waiver of such requirements, or (iii) to develop a mutually acceptable alternative. Any such changes shall not be materially inconsistent with the Project Approvals, including the SE Overlay Zone and Basic Site Plan Drawings, and previously approved Subsequent Approvals, unless Developer, in the exercise of its sole discretion, otherwise agrees.

**PART 2**  
Section 1

**SEC DESIGN GUIDELINES**  
Site Design and Features

1.1 Setbacks

- DG-1.1.1 The minimum building setbacks for Sports and Entertainment Complex buildings shall not be less than the setbacks shown in *Figure 1.1 Minimum Building Setbacks*. Setbacks shall be measured from the subject property line.
- DG-1.1.2 The following uses, structures, or facilities are allowed in any minimum building setback areas.
- (A) Driveways, alleyways, private streets, or similar vehicle circulation or access areas.
  - (B) Sidewalks and pedestrian circulation areas and facilities.
  - (C) Sound walls, privacy walls, security walls, screening, and similar features.
  - (D) Landscaping.
  - (E) Signage and graphic displays.
  - (F) Public art.

1.2 Development Limitations

- DG-1.2.1 A Sports and Entertainment Complex permitted pursuant to Ch. 12, Article 17.5 of the Inglewood Municipal Code shall not exceed the aggregate development for each use type set forth in *Table 1.2 SE Overlay Zone Development Limitations*.

Table 1.2 SE Overlay Zone Development Limitations	
Use Type	Maximum Aggregate Development
Sports and Entertainment Complex	
Event Center	
Arena	18,500 Seats (fixed or temporary)
Professional Office	71,000 SF
Medical Office or Clinic	25,000 SF
Athletic Practice and Training Facility	85,000 SF
Event Center Supporting	
Retail, Dining, and Community-Serving	63,000 SF

### 1.3 Walls and Fences

For the purposes of these SEC Design Guidelines, the term 'walls and fences' includes the following, other than temporary fencing or walls:

- Security walls or barriers
- Permanent sound walls or sound barriers
- Retaining walls
- Fences or fencing
- Bollards
- Security gates or fencing
- Permanent crowd management gating or barriers
- Other fences, gates, or gate-like security features
- Walls around parking facilities

A separate permit, other than SEC Design Review, shall not be required for the construction of any wall or fence that is in accordance with these SE Design Guidelines.

Any fences, walls, or gates associated with a pedestrian bridge and located within the Right-of-Way shall be considered an integral part of the bridge and shall not be subject to this section.

DG-1.3.1 Walls and fences may be included to buffer and enhance the appearance of development as well as provide security, privacy, sound reduction, or screening, as shown in *Figure 1.3 Fences and Walls*.

DG-1.3.2 The materials, colors, and appearance of walls or fences shall be consistent with or complementary to the architecture and overall design of adjacent structures. All walls and fences shall be treated with anti-graffiti coating. Chain link fencing is prohibited if located within twenty (20) feet of any public street or public space.

DG-1.3.3 Walls or fences viewable from the public right-of-way shall be enhanced with vegetation, public art, aesthetic or architectural treatments.

DG-1.3.4 The height of any wall or fence shall meet the following:

- (A) Walls and fences that provide security for the Event Center Structure shall not exceed 10 feet in height.
- (B) Walls and fences provided to screen equipment or other facilities may extend 2 feet higher than the equipment or other facility for which the wall provides screening, but shall not exceed 8 feet in height, except as provided in (C) below.
- (C) All walls and fences, other than sound walls or sound barriers or walls and fences that provide security for the Event Center Structure, shall not exceed 6 feet in height where located within 20 feet of West Century Boulevard or South Prairie Avenue and shall not exceed 8 feet in height where located more than 20 feet from West Century Boulevard or South Prairie Avenue.
- (D) The height of sound walls or sound barriers shall comply with Section 5.6 of these SEC Design Guidelines.

- (E) Open-work guard rail located on top of a wall shall not exceed 42 inches above the maximum height of the wall.
- DG-1.3.5 Security walls or fences should incorporate the following:
- (A) Security walls or fences should be constructed of sturdy materials, such as concrete masonry units (CMU) or bricks, treated wood or recycled plastic, or similar materials.
  - (B) Metal fences may be used if consistent with the design of adjacent buildings or in areas not primarily viewed from public gathering spaces or from West Century Boulevard or South Prairie Avenue.
  - (C) Bollards to provide a protective barrier and visual markers to enhance pedestrian safety should be constructed of sturdy materials including recycled plastic, steel, and concrete as well as stainless steel pipe guards, and should use highly visible colors.
  - (D) Security fences and gates may be comprised of independent free standing metallic construction that complements the design of adjacent architectural construction.
- DG-1.3.6 Temporary fencing (including chain link, wood, safety barricade, or other similar temporary fencing structure) may be used for temporary events, special events, crowd management, safety hazard, or construction provided such temporary fencing shall be removed following the related event or safety hazard. Temporary fencing shall not be subject to height limits.
- DG-1.3.7 No fence or wall shall incorporate barbed wire or other sharp or protruding objects.

## 1.4 Grading and Drainage

Building foundation grading or excavation is included with the building permit. Grading permits for the following shall not be not required if submitted in conjunction with a related building permit:

- Excavation, not for a building foundation, in excess of 2 feet in depth for the purpose of Low Impact Design or landscaping.
- Fill, in excess of three feet in depth, not for a building foundation for the purpose of Low Impact Design.

DG-1.4.1 The intent of shaping the ground plane and enabling slopes may include creating interest and variation and may be purely aesthetic, to screen views or create new land forms.

DG-1.4.2 Slopes should incorporate the following considerations:

- (A) Slopes under 1% do not drain well unless they are paved and carefully finished.
- (B) Slopes under 4% appear flat and are usable for all kinds of intense activity.
- (C) Slopes between 4 and 10% appear as easy grades and are suitable for practically any use.
- (D) Slopes over 8% are not suitable for handicapped access.

- (E) Slopes over 10% appear steep and require noticeable effort to climb or to descend and are a desirable maximum for service driveways and parking areas.
  - (F) Slopes over 25% are too steep for lawns and power mowing.
  - (G) Slopes over 50% cannot be protected from erosion from heavy rains except by terracing.
- DG-1.4.3 The resulting ground surface after grading shall have positive drainage throughout, without any isolated depressions. Paved areas shall not drain across public sidewalks.
- DG-1.4.4 All property should be graded to prevent surface water from draining onto neighboring properties.
- DG-1.4.5 No driveways or ramps shall have a grade greater than 15%, except as follows:
- (A) Grade may be increased to 25% if any portion having a grade greater than 20% does not exceed 25 feet in length.
  - (B) Any grade change in a driveway in excess of 15% shall have a minimum 10 feet transition section which divides the grade change into equal parts.

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## Section 2 Design Elements

### 2.1 Massing and Scale

- DG-2.1.1 Building design should incorporate physical transitions and/or setbacks from the Event Center structure to adjacent properties and to frontages along West Century Boulevard and South Prairie Avenue.
- DG-2.1.2 Building massing should reinforce the street wall with well-scaled elements or structures that are sensitive to the neighborhood context.
- DG-2.1.3 Building design should provide definition to a pedestrian scale environment through active frontages that provide transparency and physical connectivity to activities within the buildings and promote an attractive and lively environment for walking.
- DG-2.1.4 Structures should include pedestrian scale elements such as arcades, colonnades, awnings, or structural projections that reduce the perceived scale of the building.
- DG-2.1.5 Building design of Event Center Supporting Structures should break down large floor plates and vary a building's height through the creation of smaller facades or through sculptural and elegant forms that are attractive and compatible with the sports entertainment aspect of the site.
- DG-2.1.6 Building design of Event Center Supporting Structures and Infrastructure and Ancillary Structures should incorporate variety in massing to create visual interest and textures of shadow, light and materials.
- DG-2.1.7 All building elevations should be considered and integrated into the overall design, and the side and rear facades of a building should be treated with sensitivity to adjacent uses.

The conceptual site design shown in *Figure 2.1 Massing Concept* provides an illustrative example compatible with these design guidelines.

### 2.2 Height

- DG-2.2.1 The height of all Sports and Entertainment Complex structures shall conform to *Figure 2.2 Sports and Entertainment Complex Height*.

### 2.3 Frontage and Orientation

- DG-2.3.1 Building frontages that are adjacent to the public right-of-way or gathering spaces shall have active frontages that have physical and/or visual connectivity, as shown in *Figure 2.3 Frontages*. Active frontages may include architectural elements or treatments, lighting, signage that includes motion, and similar active features.
- DG-2.3.2 Building frontages should include aesthetic treatments, as shown in *Figure 2.3 Frontages*. Aesthetic treatments may include art, including public art, media, murals, static image signs, or other aesthetic or visually interesting treatments.

- DG-2.3.3 Primary public entrances and primary elevations should be oriented toward West Century Boulevard and/or South Prairie Avenue.
- DG-2.3.4 Secondary or supplemental access to pedestrian areas or structures may be provided.
- DG-2.3.5 Doors, windows, and other openings of Event Center Supporting Structures should be designed to support a dynamic, modern entertainment experience with a high ratio of glazing to wall area facing pedestrian walkways and plaza spaces.
- DG-2.3.6 Functional loading areas, storage areas, and mechanical equipment should be accessed from internal site access roads.
- DG-2.3.7 Landscape buffers, screening walls, green screens, or other transition features shall be provided between Sports and Entertainment Complex structures and adjacent residential uses where feasible considering site conditions.
- DG-2.3.8 Landscape buffers, screening walls, green screens, or other transition features should be provided between Sports and Entertainment Complex structures and all other non-residential adjacent uses where feasible considering site conditions.

## 2.4 Roofline and Profile

- DG-2.4.1 Roofs and upper level floors visible from West Century Boulevard should establish a coherent skyline that provides order, elegance and visual interest.
- DG-2.4.2 Roofline and profile design should reflect of the overall design aesthetic of the site.
- DG-2.4.3 Roofline elements including parapet walls should be developed along all elevations that can be viewed from a publicly accessible pedestrian sidewalk or walkway.
- DG-2.4.4 Roof elements may consider both solid as well as other forms such as creative structural frames, trellises, pergolas or other features that are well articulated and compatible with other building design elements.

Illustrative examples of roofline and profile design options compatible with these design guidelines are provided in *Figure 2.4 Roofline and Profile*.

## 2.5 Materials and Colors

- DG-2.5.1 The material palette for buildings should provide variety and reinforce massing and changes in the horizontal or vertical plane.
- DG-2.5.2 The color palette for buildings should reinforce project site identity and complement changes in the horizontal or vertical plane.
- DG-2.5.3 Exterior materials, textures and colors should be coordinated to express an intentional architectural theme.
- DG-2.5.4 All exterior materials and colors should be durable and should not readily deteriorate or fade from exposure to the elements.
- DG-2.5.5 Low-quality materials such as stucco, plaster, and exterior insulation and finish systems (EIFS) shall not be used at the ground-floor along any public streets, alleys, or public amenity spaces.



DG-2.5.6 Colors and materials utilized for paving and exterior building surfaces shall not produce excessive reflected glare from the sun (e.g., mirrored glass or surfaces).

Illustrative examples of materials and color design options compatible with these design guidelines are provided in *Figure 2.5.1 Building Materials and Treatments* and *Figure 2.5.2 Glass Facades*.

## 2.6 Equipment and Screening

DG-2.6.1 Screening may be accomplished through walls, landscaping, or a combination of walls and landscaping, using materials that relate to the overall design or elements of the Sports and Entertainment Complex.

DG-2.6.2 Utilities and service areas and equipment, mechanical equipment, ducting, meters or other appurtenances and storage areas at the ground level shall be screened from public right-of-way views and adjacent uses where feasible considering site conditions.

DG-2.6.3 Screening or higher parapet walls may be used to integrate mechanical equipment, ducting, meters, or other appurtenances above the ground level.

DG-2.6.4 Areas used for storage, sorting, or loading of refuse and recyclable materials and related equipment shall be enclosed and screened, and meet the following:

(A) The height of refuse and recycling enclosures shall be no less than five feet and sufficient to conceal the contents of the enclosure, including containers, with gates equal to the enclosure height.

(B) Enclosures shall be constructed of masonry, decorative block, or similar materials of a texture and color that blends with the overall design or adjacent building.

(C) Enclosures shall be constructed with an impermeable floor sloped to drain and designed so that it can be washed out and kept in a sanitary condition.

(D) The recycling and refuse enclosure or loading area shall be located in an area accessible to a collection vehicle.

DG-2.6.5 Use of chain link fencing for anti-scaling and withstanding wind may be appropriate, but avoided where visible from public spaces or within twenty feet of the public right-of-way along West Century Boulevard or South Prairie Avenue.

Illustrative examples of screening design options compatible with these design guidelines are provided in *Figure 2.6 Screening*.

## 2.7 Pedestrian Bridges

DG-2.7.1 Pedestrian bridges over public right-of-way may be provided to enable pedestrian access the Sports and Entertainment Complex.

DG-2.7.2 Pedestrian bridges shall be designed to provide a minimum vertical clearance of 17 feet above the vehicular right of way from the lowest point of the bridge or meet the requirements identified by Section 309.2(2) of the Caltrans Highway Design Manual.

DG-2.7.3 Pedestrian bridges shall be designed to provide a minimum of 20 feet in width to accommodate the pedestrian flows and provide an ADA-compliant walkway.

- DG-2.7.4 Protective screening in the form of fence-type railings shall be installed on any pedestrian bridge.
- DG-2.7.5 Pedestrian bridges should be architecturally integrated with the design of the structures or elements at bridge termination points and provide visual connections to adjacent buildings and interesting visual terminations.
- DG-2.7.6 Lighting should be provided at the pedestrian level for safety and security, and exterior lighting should be provided under and adjacent to the pedestrian bridge for safety and visibility by all transportation modes.
- DG-2.7.7 Pedestrian bridges may incorporate streetscape enhancements where they meet public right-of-way, which could include sidewalk treatments, enhanced landscaping, and streetscape elements.

Illustrative examples of design options for pedestrian bridges compatible with these design guidelines are provided in *Figure 2.7 Pedestrian Bridges*.

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## Section 3 Landscape Elements

### 3.1 Landscape Design

- DG-3.1.1 All areas within the Sports and Entertainment Complex sites not covered by buildings or structures, enclosed for storage, or circulation elements such as driveways or parking or loading areas shall be incorporated into a holistic landscape design as Primary Landscape Areas or Secondary Landscape Areas as shown in *Figure 3.1 Landscape Design Areas*.
- DG-3.1.2 The landscape design should incorporate landscaped areas and plant materials, open space, and hardscape with exterior lighting, signage and graphics, walls and fences, and pedestrian pathways in a manner that complements adjacent building design and materials and the overall design of the Sports and Entertainment Complex.
- DG-3.1.3 The landscape design should use a combination of treatments, features and elements, such as raised landforms, hardscaping, trees, shrubs, planters, and groundcover to enhance the appearance and pedestrian experience of the site.

### 3.2 Primary Landscape Areas

- DG-3.2.1 Primary Landscape Areas should be composed of a mix of open space, landscaping, and hardscape elements that integrate with and compliment the architecture of structures and creates a sense of place that supports the overall design of the Sports and Entertainment Complex.
- DG-3.2.2 Primary Landscape Areas should incorporate open space areas for pedestrian circulation, seating, eating and dining, and public gathering, recreation, and entertainment.
- DG-3.2.3 The primary open space feature of the Primary Landscaped Area should be a central pedestrian plaza.

### 3.3 Plaza Design

- DG-3.3.1 Plaza design may include areas designed for public gathering, outdoor dining, recreation, and entertainment.
- DG-3.3.2 Plaza features may include seating, activity space, outdoor stage, amplified sound, public art and sculptural elements, interactive features, trellises and shade structures, and other architectural elements.
- DG-3.3.3 Plaza design should create a strong connection between building forms, public streets and pedestrian pathways. Plaza entrances from the public street should convey a welcoming and not fortress-like presence.
- DG-3.3.4 Plaza design should establish comfortable pedestrian zones highlighted by plazas and connections to the street, pedestrian bridges, and adjacent activity centers.
- DG-3.3.5 Plaza design should provide ample space to allow for free movement of pedestrians to and from the main pedestrian entrances of the Sports and Entertainment Complex site to the Event Center.

### 3.4 Secondary Landscape Areas

- DG-3.4.1 Secondary Landscape Areas not occupied by structures or equipment should be improved with landscaping or hardscaping consistent with the overall landscape design.
- DG-3.4.2 Secondary Landscape Areas should support the program of adjacent structures or areas, such as the parking structures, service and loading areas, and accessory areas that support the Sports and Entertainment Complex not accessible to the public.
- DG-3.4.3 Secondary Landscape Areas may also act as landscape buffers between parking, loading, and public spaces.
- DG-3.4.4 Secondary Landscape Areas surrounding parking facilities shall be planted with trees at a quantity equivalent to one for each thirty lineal feet of street frontage as well as suitable shrubs, groundcover, and berms.

### 3.5 Plant Materials and Irrigation

- DG-3.5.1 Species in planted landscaped areas shall incorporate the following considerations:
  - (A) Selected plant species shall reflect a preference for native, drought tolerant or drought resistant plants.
  - (B) All plant material shall be installed in a healthy, vigorous condition typical to the species.
  - (C) Selection of specific plant materials shall be informed by soil, water, and sun conditions and other factors.
- DG-3.5.2 The landscape design should incorporate the following size and spacing considerations:
  - (A) Trees should be planted proportional to the landscaped area and may be planted in groups.
  - (B) Minimum size of tree plantings shall be 24-inch box.
  - (C) Tree wells should be 4 feet by 4 feet unless conditions require alternative dimensions.
  - (D) Shrubs planted to serve as a hedge or screen should be minimum 5-gallon size and planted with 2 to 4 feet spacing, depending on the plant species.
  - (E) Shrubs planted to serve as groundcover should be minimum one-gallon and planted at 18 to 24 inches on center. Depending on the plant material, other plants serving as groundcover should be generally spaced at a maximum of 6 to 8 inches on center when smaller than one-gallon size plants are used.
  - (F) Trees should be planted at a quantity approximate to one tree for each 200 square feet of landscaped area when the site can accommodate such.
- DG-3.5.3 Street trees shall not be required or planted in areas where such trees would interfere with anticipated pedestrian flows.

- DG-3.5.4 All planted areas including parkways shall be watered by an irrigation system with automatic controls that meets the California Model Water Efficiency guidelines outlined by CalGreen.
- DG-3.5.5 Landscaping shall be maintained in a neat and healthy condition, including proper trimming or mowing, weeding, removal of litter, fertilizing, regular watering and replacement of diseased or dead plants.

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## Section 4 Signage and Graphics

### 4.1 Definitions

The following definitions shall apply to signs within the Sports and Entertainment Complex:

#### DG-4.1.1 Sign Type

- (A) Aerial View Sign. A sign that is attached to, applied or erected on, or integrated into the roof surface of a structure, meaning any portion of a structure that is within 30 degrees of horizontal, intended to be viewed primarily from the sky.
- (B) Façade Sign. Any sign attached to, painted on, erected against, suspended from, or projected onto any façade or projection from a façade of a building or structure, which may project from or be parallel to the façade. A façade sign may include a Wall Sign, Projecting Sign, or Mural Wall Sign, as defined by Ch. 12, Article 23, Section 12-69.
- (C) Free-standing Sign. A sign that is not attached to, supported by, or projected onto a building or structure, which may include a Monument Sign or a Pole Sign as defined by Ch. 12, Article 23, Section 12-69 of the Inglewood Municipal Code, or signs integrated into sculptural elements, except a Tower Sign.
- (D) Kiosk Sign. A pedestrian-scale freestanding or façade sign that is intended to provide information to employees, patrons, and the public.
- (E) Perimeter Sign. A free-standing monument or pylon sign located near a site access point from the public right-of-way.
- (F) Tower Sign. A sign that is attached to, painted on, or projected onto a tower-like structure primarily erected for the display of signage.

#### DG-4.1.2 Display Type

- (A) Channel Letter Sign. A non-digital display comprised of multidimensional individual letters, numbers, figures, and/or an image or images that is attached to or suspended from a building or structure.
- (B) Digital Display. A display that exhibits still images or moving images, including video and animation, through the use of grid lights, cathode ray projections, light emitting diode displays, plasma screens, liquid crystal displays, fiber optics, or other electronic media or technology, that may be changed remotely through electronic means.
- (C) Interactive Display. A Digital Display or Projected Image with which a human may interact to obtain information or entertainment, including but not limited to touch-screen, voice- or motion-activated technology, or electronic communication.
- (D) Non-Digital Display. Any display other than a Digital Display or Interactive Display.

- (E) Projected Image. An image projected onto a wall, façade, screen or other immovable and unchanging surface from a distant electronic device such that the image does not originate from the plane of the surface on which it appears.

DG-4.1.3 Sign Function

- (A) Building Identification Sign. A sign that displays the name or function of a building within the Sports and Entertainment Complex, including the Mark of any Team and/or Sponsor or affiliate.
- (B) Business Identification Sign. A sign that identifies or directs attention to a business, product, service, profession, commodity, activity, sponsor, event, person, institution or any other commercial message which is generally conducted, sold, manufactured, produced, offered or occurs within the Sports and Entertainment Complex.
- (C) Entertainment Sign. A sign that displays live, recorded, full-motion, or broadcast content or static images for purposes of directing attention to or related to an activity, event, business, product, service, profession, commodity, Sponsor, Team, person, institution or any other message. An Entertainment Sign may be an on-site or off-site sign as defined by Ch. 12, Article 23, Section 12-69 of the Inglewood Municipal Code.
- (D) Informational Sign. A sign that displays directional, wayfinding, safety and security, scheduling, and similar types of information to visitors, employees, patrons, or the public.
- (E) Message Sign. A sign that displays a static image or message for purposes of directing attention to an activity, event, business, product, service, profession, commodity, Sponsor, Team, person, institution or any other message. A Message Sign may be an on-site or off-site sign as defined by Ch. 12, Article 23, Section 12-69 of the Inglewood Municipal Code.

DG-4.1.4 Sign Orientation

- (A) Aerial. A sign oriented towards and intended to be viewed primarily from the sky, which may be incidentally viewed from adjacent streets, public rights-of-way, or properties.
- (B) External Primary. A sign oriented towards and intended to be viewed from West Century Boulevard or South Prairie Avenue and public rights-of way, which may be incidentally viewed from other adjacent streets or properties.
- (C) External Secondary. A sign oriented towards and intended to be viewed from a public street other than West Century Boulevard or South Prairie Avenue, which may be incidentally viewed from adjacent properties.
- (D) Internal. A sign oriented towards and intended to be viewed primarily from outdoor pedestrian circulation areas within the Sports and Entertainment Complex site or adjacent public rights-of-way, which may be incidentally viewed from adjoining streets or adjacent properties.

DG-4.1.5 General Definitions



- (A) Sign. Any display, wall, screen, projected image, object, or other material or medium or device primarily used to announce, declare, demonstrate, or display a message and attract the attention of the public on any surface other than the ground. Non-textual and graphic patterns or marks (except those protected by registered trademark) shall not be considered a Sign.
- (B) Mark. The trade name, trademark, service mark, logo, symbol of, and/or slogan or brand tag line synonymous or closely identified with, a Sponsor or Team.
- (C) Sponsor. Any owner, operator, or tenant of the Arena and its affiliates, together with any person or entity sponsoring or otherwise providing goods, services, or support to any owner, operator, event, or tenant of the Arena or its designee pursuant to a sponsorship marketing plan, contract, or agreement (as may be modified from time to time).
- (D) Team. Any professional sports team or franchise that plays the majority of its home games at the Sports and Entertainment Complex on an annual basis.

## 4.2 Building Identification Signs

- DG-4.2.1 Building identification may be permitted as shown in *Table 4.2 Building Identification Signs, Figure 4.1 Sports and Entertainment Complex Sign Zones*.
- DG-4.2.2 A building identification façade sign may break the plane of the roof of the building on which it appears but shall be exempt from the requirement for a Special Use Permit under 12-75(E).
- DG-4.2.3 The text of any slogan that appears on or is part of a building identification sign as a Mark of a Team or Sponsor shall be smaller in scale than other textual elements of the sign such that the slogan is not the primary focus of the sign.
- DG-4.2.4 There shall be no limit on the number or size of building identification signs within the Sports and Entertainment Complex that conform to *Table 4.2 Building Identification Signs, Figure 4.1 Sports and Entertainment Complex Sign Zones*, and these SEC Design Guidelines.

Table 4.2 Building Identification Signs			
Sign Type	Display Type	Sign Orientation	Location
Aerial View	Non-Digital	Aerial	Zone 1, 4, 5
Façade	Digital	External Primary Internal	Zone 1, 2
Façade	Channel Letter	External Primary External Secondary Internal	Zone 1, 2, 3, 4, 5
Freestanding	Digital	External Primary Internal	Zone 1, 2, 4
Freestanding	Non-Digital	External Primary External Secondary Internal	Zone 1, 2, 3, 4, 5
Tower	Digital Non-Digital	External Primary	Zone 2
Kiosk	Digital Interactive	External Primary External Secondary Internal	Zone 1, 2, 3, 4, 5, 6
Perimeter	Digital Non-Digital	External Primary	Zone 2, 4, 6

### 4.3 Business Identification Signs

- DG-4.3.1 Business identification signs may be permitted anywhere within the Sports and Entertainment Complex as shown in *Table 4.3 Business Identification Signs* and *Entertainment Signs* and *Figure 4.1 Sports and Entertainment Complex Sign Zones*.
- DG-4.3.2 There shall be no limit on the number or size of business identification signs within the Sports and Entertainment Complex that conform to *Table 4.3 Business Identification Signs*, *Figure 4.1 Sports and Entertainment Complex Sign Zones*, and these SEC Design Guidelines.

Table 4.3 Business Identification Signs			
Sign Type	Display Type	Sign Orientation	Location
Façade	Digital	Internal	Zone 1, 2, 3
Façade	Non-Digital	External Primary External Secondary Internal	Zone 1, 2, 3
Freestanding	Digital	Internal	Zone 1, 2, 3
Freestanding	Non-Digital	External Primary External Secondary Internal	Zone 1, 2, 3, 4, 5
Kiosk	Digital Interactive	External Primary External Secondary Internal	Zone 1, 2, 3, 4, 5, 6,

### 4.4 Informational Signs

- DG-4.4.1 Informational signs shall be permitted anywhere within the Sports and Entertainment Complex as shown in *Table 4.4 Informational Signs* and *Figure 4.1 Sports and Entertainment Complex Sign Zones*.
- DG-4.4.2 Informational signs should be used to aid and guide the flow of vehicular and pedestrian traffic through the site and provide information to visitors, employees, and the public about the Sports and Entertainment Complex operations, amenities, safety measures, and similar information.
- DG-4.4.3 There shall be no limit on the number or size of informational signs within the Sports and Entertainment Complex that conform to *Table 4.4 Informational Signs*, *Figure 4.1 Sports and Entertainment Complex Sign Zones*, and these SEC Design Guidelines.

Table 4.4 Informational Signs			
Sign Type	Display Type	Sign Orientation	Location
Façade Freestanding	Non-Digital	External Primary External Secondary Internal	Zone 1, 2, 3, 4, 5, 6
Kiosk	Digital Interactive	External Primary External Secondary Internal	Zone 1, 2, 3, 4, 5, 6,
Perimeter	Digital Non-Digital	External Primary	Zone 2, 4, 6

## 4.5 Message and Entertainment Signs

- DG-4.5.1 Message Signs and Entertainment Signs may be permitted within the Sports and Entertainment Complex as shown in *Table 4.5 Message and Entertainment Signs* and *Figure 4.1 Sports and Entertainment Complex Sign Zones*.
- DG-4.5.2 There shall be no limit on the number or size of message and entertainment signs within the Sports and Entertainment Complex that conform to *Table 4.5 Message and Entertainment Signs*, *Figure 4.1 Sports and Entertainment Complex Sign Zones*, and these SEC Design Guidelines.

Table 4.5 Message and Entertainment Signs				
Sign Type	Display Type	Sign Function	Sign Orientation	Location
Façade	Digital	Entertainment	External Primary Internal	Zone 1, 2
Façade	Digital	Message	External Primary Internal	Zone 1, 2, 3
Façade	Non-Digital	Message	External Primary Internal	Zone 1, 2, 3, 4, 5
Freestanding	Digital	Entertainment	External Primary Internal	Zone 1, 2
Freestanding	Non-Digital	Message	External Primary Internal	Zone 1, 2, 3, 4, 5
Tower	Digital Non-Digital	Entertainment	External Primary Internal	Zone 2
Perimeter	Digital	Message	External Primary	Zone 2, 4, 6
Kiosk	Digital Interactive	Entertainment	External Primary External Secondary Internal	Zone 1, 2, 4, 5

## 4.6 Orientation

- DG-4.6.1 Business Identification Signs and Informational Signs should be oriented to be primarily viewed by the intended audience.
- DG-4.6.2 All exterior Digital Display Signs shall include louvers integrally cast into sign faces to improve visibility and direct the display to the intended audience and reduce visibility of the sign face and direct light away from overhead flight paths.
- DG-4.6.3 Conceptual examples of External Primary and External Secondary orientations are provided for illustrative purposes in *Figure 4.6 External Orientation*.

## 4.7 Projection

- DG-4.7.1 Façade signs may project no more than three feet into the public right-of-way. Any projection into the public right-of-way shall require an approval by the Department of Public Works...
- DG-4.7.2 A minimum of ten feet of vertical clearance shall be provided from the bottom of a façade sign projecting from a building or structure to the finished grade below the sign for any sign that projects into the public right-of-way.

## 4.8 Illumination and Brightness

- DG-4.8.1 Any Sign within the Sports and Entertainment Complex may be illuminated by internal or external means.
- DG-4.8.2 All Signs within the Sports and Entertainment Complex shall conform to an approved Lighting Design Plan, as defined and required by Mitigation Measure 3.1- 2(b) of the IBC MMRP.
- DG-4.8.3 All Digital Display Signs and Interactive Display Signs shall be controllable by the combination of a photocell that measures available daylight and remote adjustment capabilities that control the luminance levels of the Sign, and utilize automatic dimming technology, include a default mechanism that causes the Sign to revert immediately to a black screen if the Sign malfunctions in a way that causes the display to wholly or partly flash.
- DG-4.8.4 All Digital Display Signs and Interactive Display Signs shall comply with the relevant maximum daytime and nighttime luminance levels set forth in *Table 4.8 Digital Luminance Levels*.

Table 4.8 Digital Luminance Levels	
Period	Maximum Luminance Level
Daytime Luminance Level	8,000 candelas per square meter
Nighttime Luminance Level	800 candelas per square meter

- DG-4.8.5 The luminance of any Digital Display Sign shall transition smoothly at a consistent rate of speed from the Daytime Luminance Level to the Nighttime Luminance Level, beginning no less than 20 minutes prior to sunset and concluding the transition to nighttime intensity level no less than 20 minutes after sunset.
- DG-4.8.6 The luminance of any Digital Display Sign shall transition smoothly at a consistent rate of speed from the Nighttime Luminance Level to the Daytime Luminance Level, beginning no less than 20 minutes prior to sunrise and concluding the transition to daytime intensity level no less than 20 minutes after sunrise.

## 4.9 Presentation

- DG-4.9.1 Any image displayed on any External Primary-oriented Digital Display Message Sign shall be presented continuously for at least eight seconds following the completion of its transition from the previous message and including the transition time to the next message.
- (A) When an image is changed electronically, the transition between presentation of the previous image and presentation of the next image shall be accomplished in one-half second or less. The transition period shall be measured as that period between the time that the previous image is fully presented and the next image is fully presented.
- DG-4.9.2 Any Internal-oriented Digital Display or Interactive Display Entertainment Sign shall not be subject to a limitation on time between transition, display time, or motion.

## 4.10 Materials

- DG-4.10.1 All permanent signs should be constructed of materials that are durable and not likely to fade, corrode, or otherwise deteriorate.
- DG-4.10.2 Signs shall not use highly reflective materials such as mirrored glass.

## 4.11 Exempt Signs

- DG-4.11.1 The following permitted signs and/or sign structures are exempt from the permit requirement of Ch. 12, Article 23, Section 12-72 of the Inglewood Municipal Code:
- (A) Interior Signs. Signs located within a structure or a building.
- (B) Portable Signs. Bi-faced, free-standing signs, not to exceed four (4) feet in height at fully-open standing position, if such signs may be readily removed from public view at the end of each business day.
- (C) Temporary Signs. Temporary graphics, decorations, and freestanding elements associated with special events, holidays, commemorations, or celebrations (e.g., concert event) or seasons (e.g., the NBA Basketball season).

- (D) String Pennants. String pennants may be displayed to activate public spaces for temporary events, provided that such string pennants are displayed in an orderly and well-maintained condition.
- (E) Public and Community Notices and Signs. Public notices posted pursuant to law, signs erected by governmental agencies and public utilities, warning or information signs required by law for public health and safety, and public service announcements.
- (F) Building Banner Graphics. A sign, consisting of a Projected Image onto a building face or wall or printed on vinyl, mesh or other material with or without written text, supported and attached by an adhesive and/or by using stranded cable and eye-bolts and/or other materials or methods.
- (G) Changeable Copy Signs. The changing of the copy or message on any permitted sign.



## Section 5            Lighting and Acoustics

### 5.1    Exterior Lighted Areas

- DG-5.1.1        Exterior lighting should be integrated into the design of structures or relate to the overall design of the Sports and Entertainment Complex to encourage pedestrian activity and support a modern sports and entertainment environment.
- DG-5.1.2        Pedestrian entrances, walkways, and activity areas, vehicle entrances and driveways, parking areas, and service areas should be well-lit to provide security and safety.
- DG-5.1.3        Prominent exterior lighting features not required for security and safety lighting should be equipped to control the intensity of lighting and allow for dimming or color variation.

### 5.2    Architectural Lighting

- DG-5.2.1        Architectural lighting should accentuate major architectural features and relate to pedestrian scale.
- DG-5.2.2        Sports and Entertainment Complex structures may incorporate large-scale architectural lighting, which may include the following:
- (A)    Large-scale architectural lighting elements placed on a building façade to highlight or accentuate elements of the architecture of the structure, which may be multi-hued or change hues in a slow, programmed manner.
  - (B)    Integrated-large scale lighting that is attached directly to and made integral with architectural elements on the facade of a building, which may include individual light sources or pixels of a digital light source embedded into architectural components, low resolution digital mesh or netting, individual large scale pixels covering a building wall, light sources diffused behind translucent material, backlit panels, or horizontal or vertical LED banding integrated into architecture of a building, or similar treatments or features.
- DG-5.2.3        Large-scale architectural lighting shall not be considered signage for the purposes of the Inglewood Municipal Code or these SE Design Guidelines.

### 5.3    Exterior Luminaries and Fixtures

- DG-5.3.1        Luminaries and lighting fixtures should be coordinated on the basis of function and appearance to be architecturally compatible with the structures overall design of the Sports and Entertainment Complex.
- DG-5.3.2        All exterior lighting fixtures should be light-emitting diode (LED) fixtures or other similarly energy-efficient lighting technology.

- DG-5.3.3 Project outdoor security and architectural lighting may include low-level exterior lights mounted to the building and along pathways for security and wayfinding purposes.
- DG-5.3.5 The use of permanent fixtures with exposed bulbs for exterior lighting shall be prohibited.
- DG-5.3.6 The use of searchlights, spotlights, or other similar fixtures directed to the open sky or areas outside the Sports and Entertainment Complex site shall be prohibited.
- DG-5.3.7 Electrical service for all lighting should be placed underground or within structures unless determined to be physically infeasible.

## 5.4 Direction and Shielding

- DG-5.4.1 Exterior lighting should be installed, directed and shielded to direct the majority of artificial light to buildings, objects, or target areas within the boundaries of the Sports and Entertainment Complex and minimize light spill to adjacent properties.
- DG-5.4.2 Security and safety lighting should be recessed, hooded, and located to illuminate only the intended area.
- DG-5.4.3 Exterior lighting placement and direction should be designed to work with structural and/or vegetative screening to prevent light spill to adjacent properties.
- DG-5.4.4 Lighting for parking facilities should be designed to direct the majority of light into the parking facility and minimize light spill to adjacent properties.

Illustrative examples of lighting design options compatible with these Design Guidelines are provided in *Figure 5.1 Lighting*.

## 5.5 Lighting Design Plan

- DG-5.5.1 All Sports and Entertainment Complex exterior lighting shall conform to an approved Lighting Design Plan, as defined and required by Mitigation Measure 3.1-2(b) of the IBEC MMRP.
- DG-5.5.2 The Sports and Entertainment Complex shall include any lighting or marking requirements required by Mitigation Measure 3.8-5 of the IBEC MMRP.

## 5.6 Acoustic Facilities

- DG-5.6.1 Sound walls or barriers may be located in the areas shown in *Figure 1.3 Walls and Fences* or located in areas that serve a similar purpose and function.
- DG-5.6.2 Sound walls or barriers shall meet the following standards:
  - (A) Sound walls shall be solid with no gaps or cracks that might otherwise be considered acoustical "leaks."
  - (B) Sound walls shall have sufficient mass so as to provide a Sound Transmission Class (STC) rating of at least 27.

- (C) The Noise Reduction Coefficient (NRC) on the receiver-side face shall be NRC 0.85 or greater.
  - (D) Publicly visible faces of sound walls shall feature vegetation or other aesthetic treatments, as long as such treatments do not inhibit the required acoustical performance.
  - (E) Sound walls or barriers shall not exceed 15 feet or the height necessary to meet the performance standards established by Mitigation Measure 3.11-2(a) of the IBEC MMRP, whichever is higher.
- DG-5.6.3 Any outdoor sound amplification system, equipment, and related structures shall be designed to limit noise levels near noise-sensitive receptors through design considerations such as placement, distribution, directivity, orientation, number of speakers and/or volume controls.
- DG-5.6.4 Sound-absorbing materials should be included on the exterior of buildings surrounding gathering spaces where feasible and effective to reduce noise levels to sensitive receptors.
- DG-5.6.5 Sound-absorbing materials should be incorporated into the design of parking facilities where feasible and effective to reduce noise levels to sensitive receptors.
- DG-5.6.6 Any rooftop outdoor restaurant or dining area included in the Sports and Entertainment Complex shall include an enclosure such as glass to serve as a noise barrier.
- DG-5.6.7 Noise generating mechanical equipment shall be located the furthest feasible distance away from noise-sensitive receptors considering site conditions and function.
- DG-5.6.8 Noise generating mechanical equipment, such as emergency generators, transformers, and HVAC units, shall be designed and installed to limit noise to noise-sensitive receptors with acoustical enclosures, silencers, barriers, relocation, or other noise reducing approaches.
- DG-5.6.9 The Sports and Entertainment Complex shall conform to an approved Operational Noise Reduction Plan, as defined and required by Mitigation Measure 3.11-2(a) of the IBEC MMRP.

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## Section 6            Circulation

### 6.1    Vehicular Circulation

- DG-6.1.1      Vehicular access to parking facilities may be provided from West Century Boulevard, South Prairie Avenue and/or West 102nd Street, as shown for illustrative purposes in *Figure 6.1 Circulation*.
- DG-6.1.2      Vehicular access points to the Sports and Entertainment Complex should be designed to be clearly visible and accommodate event-related traffic management and security measures.
- DG-6.1.3      A pick-up and drop-off area for shuttles to bus and rail public transit shall be provided at a designated section of South Prairie Avenue adjacent to the Sports and Entertainment Complex.
- DG-6.1.4      Parking and vehicle circulation facilities shall be designed to provide access to and manage the circulation of private automobiles, rideshare or transportation network company and taxi vehicles, coach buses and mini-buses, microtransit vehicles, and paratransit vehicles.
- DG-6.1.5      Truck access to loading areas within the Sports and Entertainment Complex shall be provided from West Century Boulevard or West 102nd Street.
- DG-6.1.6      Emergency vehicle access and onsite wayfinding signage to the Sports and Entertainment Complex shall be provided as required and approved by the Los Angeles County Fire Department. Such access may be provided from West Century Boulevard, South Prairie Avenue and/or West 102nd Street.

### 6.2    Pedestrian Circulation

Pedestrian circulation is a critical network for creating an engaging experience that is safe and efficient for the movement of people to and through the Arena. Consider alignment of walkways, the visual approach to buildings, and the spatial sequence along pedestrian routes to create a connected pathway system.

- DG-6.2.1      The pedestrian circulation network and facilities should facilitate walkability and connection to publicly-accessible areas throughout the Sports and Entertainment Complex and adjacent development.
- DG-6.2.2      Pedestrian pathways within the Sports and Entertainment Complex should be designed to accommodate pedestrian traffic and access patterns and security features and operations during all event conditions, including paving or other forms of visible pathway delineation to create clear paths of travel.
- DG-6.2.3      The Sports and Entertainment Complex should include well-marked, clearly-visible entrances, and all publicly-accessible entrances should include architectural or graphic treatments compatible with the overall design.
- DG-6.2.4      Pedestrian routes should direct pedestrians to the main circulation areas within the Sports and Entertainment Complex and the Arena in the manner shown in Figure 6.1.

- DG-6.2.5 All publicly-accessible pedestrian routes, gathering spaces, and buildings within the Sports and Entertainment Complex shall comply with relevant requirements of the Americans with Disabilities Act (ADA) including clear path of travel widths.

### 6.3 Pedestrian Features

- DG-6.3.2 The overall site design should include pedestrian scale elements and incorporate pedestrian-scale lighting, signage and wayfinding features to promote an attractive and lively environment for walking.
- DG-6.3.1 Pedestrian features such as stairs, walkways, pedestrian bridges, sidewalks, and seating areas should be sensitive to the human scale and integrated into the overall site design and architecture.
- DG-6.3.3 Pedestrian circulation areas may be supplemented with elements that create ground-level interest such as shade structures, landscape, or water features, art, kiosks, seating, alternative paving materials, or other features.
- DG-6.3.4 The landscape design may incorporate pedestrian amenities such as benches or seating, lights, railings and shading elements, and ornamental features or lighting.

Illustrative examples of pedestrian features, concepts, and options compatible with these SEC Design Guidelines are provided in *Figure 6.3 Pedestrian Features*.

### 6.4 Pedestrian Grades and Ramps

- DG-6.4.1 In compliance with the Americans with Disabilities Act (ADA), any ramps in pedestrian walkways shall have a maximum slope of 1:12, shall have a minimum clear width of 36 inches and landing lengths of 60 inches.
- DG-6.4.2 Ramps in pedestrian walkways shall contain a detectable warning device, such as a raised dome surface and contrasting color.
- DG-6.4.3 Curb ramps shall be installed wherever a sidewalk crosses a curb such as at street intersections.

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## Section 7            Parking

### 7.1 Parking and Transportation Facilities

- DG-7.1.1        Automobile parking spaces required for any Sports and Entertainment Complex use pursuant to Ch. 12, Article 19, Section 12-39.96.1 of the Inglewood Municipal Code may be provided within any parking facility within the Sports and Entertainment Complex.
- DG-7.1.2        The Sports and Entertainment Complex shall include parking for coach buses and microtransit, mini-bus, or paratransit vehicles. Parking for such transportation vehicles may be provided within the same facility as automobile parking.
- DG-7.1.3        The Sports and Entertainment Complex shall include areas to accommodate taxis, Transportation Network Company (“TNC”) vehicles, or vehicles providing similar ridesharing or ridehailing services, including a pick-up and drop-off area for passengers and a queuing area for such vehicles. Such transportation facilities may be provided within the same facility as automobile parking.
- DG-7.1.4        Additional parking in excess of the required parking or for specialized vehicles such as media broadcast trucks or other vehicles related to any use within the Sports and Entertainment Complex may be provided.
- DG-7.1.5        Valet parking may be provided within any parking facility.

### 7.2 TNC Facilities

- DG-7.2.1        Passenger pick-up and drop-off areas or facilities providing passenger access to TNC vehicles, or vehicles providing similar ridesharing or ridehailing services, shall be designed to provide safe pedestrian access between such vehicles and pedestrian circulation areas.
- DG-7.2.2        Transportation facilities shall include a vehicle queuing area to allow vehicles to access passenger pick-up and drop-off areas or facilities.
- DG-7.2.3        The minimum width of any lanes provided for queuing for taxi, TNC vehicles, or similar vehicles shall be 8 feet.
- DG-7.2.4        Pavement and drainage for any facility or portion of a facility providing passenger pick-up or drop-off or queuing areas for TNC vehicles located within a surface lot shall comply with Ch. 12, Article 19, Section 12-55.2 of the Inglewood Municipal Code.

### 7.3 Transportation Demand Management

- DG-7.3.1        Preferential parking for employee carpool or vanpool vehicles should be provided within parking facilities in locations that provide convenient access for employees and designated through clearly visible signage or space markings.
- DG-7.3.2        Information about alternative modes of transportation such as public transit, ridesharing, bicycling, and pedestrian modes and related available programs and facilities should be provided via information kiosk, bulletin board located, or similar feature within the Sports and Entertainment Complex.

- DG-7.3.3 The following bicycle parking spaces and facilities shall be provided within the Sports and Entertainment Complex:
- (A) A minimum of 60 bicycle parking spaces available for use by employees;
  - (B) A minimum of 23 bicycle parking spaces available for use by Sports and Entertainment Complex patrons;
  - (C) Shower and locker facilities available to employees who commute by bicycle;
  - (D) A bicycle repair station accessible to employees and patrons.
- DG-7.3.4 Bicycle parking and facilities shall be provided in areas within the Sports and Entertainment Complex that provides safe and convenient access to employees and patrons visitors traveling by bicycle, considering site conditions.

## 7.4 Vehicular Access to Parking and Transportation Facilities

- DG-7.4.1 Driveways providing vehicular access to a parking or transportation facility may provide dedicated ingress lanes or egress lanes, two-way lanes, or reversible ingress/egress lanes.
- DG-7.4.2 The width of any dedicated ingress lane or egress lane, or reversible ingress/egress lane providing access to a parking or transportation facility shall not be less than 10 feet.
- DG-7.4.3 The width of any two-way lane providing access to a parking or transportation facility shall not be less than 20 feet.
- DG-7.4.4 A driveway that provides ingress or egress to a parking or transportation facility may be closed or obstructed to prevent ingress or egress when such access is not required to provide parking for a use or event within the Sports and Entertainment Complex or as necessary to implement a transportation management plan or strategies, so long as access to the parking or transportation facility is adequately maintained to meet the parking requirements of uses in operation.
- DG-7.4.5 A gate, raisable arm, or other device or technology may be used to control or regulate vehicular ingress or egress to a parking or transportation facility.
- DG-7.4.6 The location and function of any device or technology used to control or regulate vehicular access to a parking or transportation facility should be designed to reduce the need for queuing on public streets to enter the facility, as feasible considering site conditions, event conditions, and vehicular circulation.
- DG-7.4.7 Any driveway providing ingress or egress to any parking or transportation facility shall be paved to standards not less than required per Ch. 12, Article 19, Section 12-55.2 of the Inglewood Municipal Code.

## 7.5 Parking Facility Design

- DG-7.5.1 Traffic circulation within any facility or portion of a facility providing required automobile parking shall comply with Ch. 12, Article 19, Section 12-55 of the Inglewood Municipal Code.



- DG-7.5.2 Access and turning radius for any facility or portion of a facility providing automobile parking required pursuant to IMC 12-38.96.1 shall comply with Ch. 12, Article 19, Section 12-54 of the Inglewood Municipal Code.
- DG-7.5.3 Driveway slopes and ramps for any facility or portion of a facility providing required automobile parking shall comply with Ch. 12, Article 19, Section 12-54.1 of the Inglewood Municipal Code.
- DG-7.5.4 Parking space striping for any facility or portion of a facility providing required automobile parking shall comply with Ch. 12, Article 19, Section 12-55.1 of the Inglewood Municipal Code.
- DG-7.5.5 Parking lot pavement and drainage for any facility or portion of a facility providing required automobile parking within a surface lot shall comply with Ch. 12, Article 19, Section 12-55.2 of the Inglewood Municipal Code.
- DG-7.5.6 Parking slope of any facility or portion of a facility providing required automobile parking shall comply with Ch. 12, Article 19, Section 12-55.3 of the Inglewood Municipal Code.
- DG-7.5.7 Within any portion of a parking structure provided for public automobile parking, continuous raised concrete curbs may be provided three feet from the end of a parking space as necessary to ensure that any parked vehicle will not touch any wall, building, or other object.
- DG-7.5.8 Wheel stops may be provided where necessary to protect landscaping, parking equipment, or other infrastructure and should be located to avoid tripping hazards.
- DG-7.5.9 The visual impact of parking or transportation facilities should be reduced by providing landscape buffer areas, screening, or natural topography or planned grading, consistent with these SEC Design Guidelines.

## 7.6 Parking Space Dimensions

- DG-7.6.1 Any automobile parking space provided to meet parking requirements for the Sports and Entertainment Complex per Ch. 12, Article 19, Section 12-38.96.1 of the Inglewood Municipal Code shall comply with Ch. 12, Article 19, Sections 12-51(A) and 12-51(B) of the Inglewood Municipal Code, as applicable, and as shown in *Table 7.6 Parking Space Dimensions*.
- DG-7.6.2 Parking spaces provided for coach buses, microtransit, mini-bus, or paratransit vehicles shall comply with *Table 7.6 Parking Space Dimensions*.

Table 7.6 Parking Space Dimensions			
Parking Space Type	Minimum Width	Minimum Length	Minimum Vertical Clearance
Standard Parking Space (no obstructions or not more than one column or post on one side of the space)	8'	18'	8'2"
Standard Parking Space (multiple columns or posts or obstructions on one side of the space)	9'	18'	
Standard Parking Space (multiple columns or posts or obstructions on more than one side of the space)	9'6"	18'	
Compact Parking Space	8'	16'	
Coach Bus Space	12'	39'	
Tandem Parking Space (2 vehicles)	9'	36'	
Microtransit, Mini-bus, or Paratransit Vehicle Space	12'	25'	

DG-7.6.3 Compact parking spaces may be provided to meet the parking requirements of any Sports and Entertainment Complex use, consistent with Ch. 12, Article 19, Section 12-49(A) of the Inglewood Municipal Code.

DG-7.6.4 Tandem parking shall not be utilized to satisfy the required number of parking spaces for any Sports and Entertainment Complex use. Areas provided for vehicle queueing or passenger pick-up and drop-off shall not be considered tandem parking.

### 7.7 Accessible Parking

DG-7.7.1 The Sports and Entertainment Complex shall provide accessible parking per the requirements of Ch. 12, Article 19, Section 12-57 of the Inglewood Municipal Code and any applicable State of California requirements.

DG-7.7.2 Required accessible parking spaces may be provided in any parking facility within the Sports and Entertainment Complex.

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## Section 8 Loading

### 8.1 Loading Space Location

- DG-8.1.1 Required loading spaces shall be accommodated entirely within the Sports and Entertainment Complex site.
- DG-8.1.2 Required loading spaces may be provided in subterranean structure in an area that can be readily driven upon or provides reasonable access to the loading spaces.
- DG-8.1.3 Any required loading space shall not encroach into any public right-of-way or otherwise obstruct any on-site drive aisle or parking space.

### 8.2 Loading Space Design

- DG-8.2.1 Any loading space required for the Event Center shall be a minimum width of ten feet wide and a minimum length of thirty feet.
- DG-8.2.2 Any loading space required for Event Center Supporting Uses shall be a minimum width of ten feet wide and minimum length of twenty feet.
- DG-8.2.3 Any required loading space shall have a minimum height clearance of fourteen feet.
- DG-8.2.4 The entire surface of a required loading space shall be paved with asphalt or concrete and shall comply with Ch. 12, Article 19, Section 12-55.2 of the Inglewood Municipal Code.
- DG-8.2.5 The design of any subterranean loading facility shall accommodate maneuvering delivery vehicles such as trucks or tractor-trailers into and out of loading positions at the docks, stalls and driveways.

### 8.3 Access and Screening

- DG-8.3.1 Access to required loading spaces shall be provided from interior site access roads or driveways accessed from West Century Boulevard or West 102<sup>nd</sup> Street.
- DG-8.3.2 Required loading spaces should be visibly separated from public entrances and parking areas within the Sports and Entertainment Complex and shall be screened with a combination of walls and landscaping to minimize views of the loading area from public views and adjacent residential uses.
- DG-8.3.3 Loading areas in excess of the required loading spaces may be provided in loading zones along South Prairie Avenue as approved or designated by the City of Inglewood Department of Public Works.

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## Section 9 Sustainability and Environmental Sensitivity

### 9.1 Green Buildings

- DG-9.1.1 The Event Center Structure and the Event Center Supporting Structures shall be designed to meet the requirements for U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) Gold certification for new construction.
- DG-9.1.2 The Sports and Entertainment Complex shall include project design features that enable the Arena to exceed the building energy efficiency standards set forth in Part 6 of Title 24 of the California Code of Regulations.

### 9.2 Solar Energy Generation

- DG-9.2.1 The Sports and Entertainment Center Complex shall implement an electrical supply strategy that incorporates a solar energy generation system and battery energy storage.
- DG-9.2.2 Solar photovoltaic panels may be incorporated into the design of any structure within the Sports and Entertainment Complex.

Illustrative examples of solar panel design options compatible with these design guidelines are provided in *Figure 9.2 Solar Panels*.

### 9.3 Recycling

- DG-9.3.1 The design of the Sports and Entertainment Complex should incorporate features and allocate space to support implementation of a comprehensive waste reduction and diversion program.

### 9.4 Alternative Transportation

- DG-9.4.1 The design of the Sports and Entertainment Complex should include circulation or access features or spaces to accommodate the use of rail transit by employees and attendees of events hosted at the Arena such as a shuttle service pick-up and drop-off area or pedestrian connections to nearby stations.
- DG-9.4.2 The design of the Sports and Entertainment Complex should include circulation and parking facilities to accommodate local microtransit service and park-n-ride service for employees and attendees of events hosted at the Arena.
- DG-9.4.3 The design of the Sports and Entertainment Complex should include facilities to support active transportation modes, such as bicycle parking, bicycle repair stations, and locker room and shower facilities for employees.

### 9.5 Parking Facilities

- DG-9.5.1 Any parking facility made available to the public for automobile parking shall include a vehicle circulation and parking availability system or features to help reduce vehicle circulation and idling time within the parking facility.
- DG-9.5.2 Any parking facilities made available to the public for automobile should include preferential parking for carpool vehicles.

## 9.6 Electric Vehicle Charging

- DG-9.6.1 Not less than eight percent (8%) of all required parking spaces for private automobile parking pursuant to Ch. 12, Article 19, Section 12-39.96.1 of the Inglewood Municipal Code shall be equipped with electric vehicle supply equipment (EVSE).
- DG-9.6.2 Truck loading spaces or docks provided within the Event Center should be equipped with EVSE to accommodate zero emission or near-zero emission delivery trucks.
- DG-9.6.3 All parking and loading spaces with EVSE shall be clearly identified and provide adequate access in accordance with the California Building Code.
- DG-9.6.4 All EVSE shall meet the following requirements:
- (A) Provide Level II charging capacity (208 – 240 volts) or greater.
  - (B) Comply with the relevant regional or local standard for electrical connectors, such as SAE Surface Vehicle Recommended Practice J1772, SAE Electric Vehicle Conductive Charge Coupler.
  - (C) Be networked or internet addressable and capable of participating in a demand-response program or time-of-use pricing.

Illustrative examples of EVSE design options compatible with these design guidelines are provided in *Figure 9.3 Electric Vehicle Charging*.

## 9.7 Water and Stormwater

- DG-9.7.1 Outdoor water use should be reduced through best management practices such the use of water-efficient landscaping materials (emphasizing native or adapted plants), efficient irrigation systems, and the use of reclaimed water for irrigation, or similarly effective strategies or measures.
- DG-9.7.2 Indoor water usage should be reduced through installation of efficient flush and flow fixtures or similarly effective strategies or measures.
- DG-9.7.3 Site design shall comply with all applicable Regional Water Quality Control Board and County of Los Angeles regulations for water quality and quantity including preparation of a Low Impact Development (LID) Plan with Operation and Maintenance Guidelines.
- DG-9.7.4 Site design should employ low impact development (LID) strategies to minimize impervious areas through site design features, which may include but are not limited to:
- (A) Bio-filtration and stormwater planters designed to capture site runoff from roof drains and/or surface flow, treat the runoff through biological reactions within

the planter soil media, and discharge at a rate intended to mimic pre-developed conditions.

- (B) Site specific BMPs designed and sized to properly manage the storm runoff prior to discharging from the site and into public storm drain lines.

## 9.8 Bird Collision Deterrence

DG-9.8.1 Exterior façade materials should be designed to achieve a maximum threat factor of 25 in accordance with the American Bird Conservancy Bird Collision Material Threat Factor Reference Standard.

DG-9.8.2 All externally visible transparent glass panels or façade surfaces should be designed with treatments to reduce bird collisions, such as fritting or similar patterns, etching, stained or frosted glass, or UV reflective or absorbing patterns, or similar treatments.

Illustrative examples of design options for bird collision deterrence features compatible with these design guidelines are provided in *Figure 9.8 Bird Collision Deterrence*.

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## Section 10 Design Considerations for Specific Uses

### 10.1 Sale, Service, or Consumption of Alcoholic Beverages

- DG-10.1.1 Any areas in which alcoholic beverages are sold, served, or consumed shall be lighted and arranged to allow for observation of all such areas by supervisor or security personnel.
- DG-10.1.2 Designated areas for the permitted sale, service, or consumption of alcoholic beverages shall be defined by clearly visible physical features, boundary indications, and/or signage.
- DG-10.1.3 A sign stating "We ID everyone under 30 years of age for alcohol sales" shall be displayed at or near the point of sale of any alcoholic beverages in a manner easily readable by a patron purchasing an alcoholic beverage.
- DG-10.1.4 A kitchen or food menu shall not be a requirement for the sales or service of alcoholic beverages by any establishment or operator within the Sports and Entertainment Complex.
- DG-10.1.5 Establishments serving alcoholic beverages may include a bar or lounge area separate from the main food service area of the establishment.
- DG-10.1.6 Recommendations of the Los Angeles County Fire Department relative to fire safety shall be incorporated for areas within the Sports and Entertainment Complex in which alcohol may be sold, served, or consumed.
- DG-10.1.7 Recommendations of the Inglewood Police Department regarding security measures for the protection of visitors and employees appropriate to the design of the site shall be incorporated for areas within the Sports and Entertainment Complex in which alcohol may be sold, served, or consumed.

### 10.2 Outdoor Restaurants or Dining Areas

- DG-10.2.1 Outdoor dining areas or spaces shall be separated from parking lots, driveways and public sidewalks by location, temporary or permanent screening features, and/or landscaping.
- DG-10.2.2 Exterior lighting for any outdoor dining area shall not be directed onto any adjacent residential property.
- DG-10.2.3 The perimeter of any outdoor dining area where alcoholic beverages are served or consumed shall be defined by temporary or permanent physical barriers that form defined points of access to such area.

### 10.3 Communications Facilities

- DG-10.3.1 Communications facilities, antennas, or related equipment shall not be located in parking or loading spaces, vehicular or pedestrian circulation areas, or open space areas such that it would interfere or impair the intended function or utility of such area.

- DG-10.3.2 Communications facilities and related equipment should be integrated into a structure, architectural feature of a building, or public art or other element, or otherwise screened from public view in a manner that is compatible with the overall design of the Sports and Entertainment Complex.
- DG-10.3.3 The exterior finishes of communications facilities and related equipment should be non-reflective and blend with the materials and colors of surrounding buildings, structures, and/or landscaping.
- DG-10.3.4 Any permanently-installed communications facilities, antennas or related equipment shall not exceed the height limits established in Section 2 of these Design Guidelines.

#### 10.4 Public Art

- DG-10.4.1 Public art may be provided within the Sports and Entertainment Complex to meet the requirements of Article 14 of Chapter 11, as amended by the Project Approvals. When provided on-site, public art shall be placed in areas that are publicly viewable or publicly accessible and do not require a fee for admission (such as ticketed events) as follows:
- (A) Attached to, applied or erected on, suspended from, or integrated into any structure within the Sports and Entertainment Complex structure;
  - (B) Within any Primary Landscape Area, as described in in Section 3 of these SEC Design Guidelines;
  - (C) Within any Secondary Landscape Area, as described in in Section 3 of these SEC Design Guidelines; or
  - (D) Any other publicly viewable or publicly accessible location identified in a development agreement between the developer of the Sports and Entertainment Complex and the City.
- DG-10.4.2 Public art placed within the Sports and Entertainment Complex should be located to maintain adequate vehicular and pedestrian access and circulation areas.
- DG-10.4.3 The location of public art should allow for viewing from a variety of vantage points from within the Sports and Entertainment Complex or the public right-of-way.

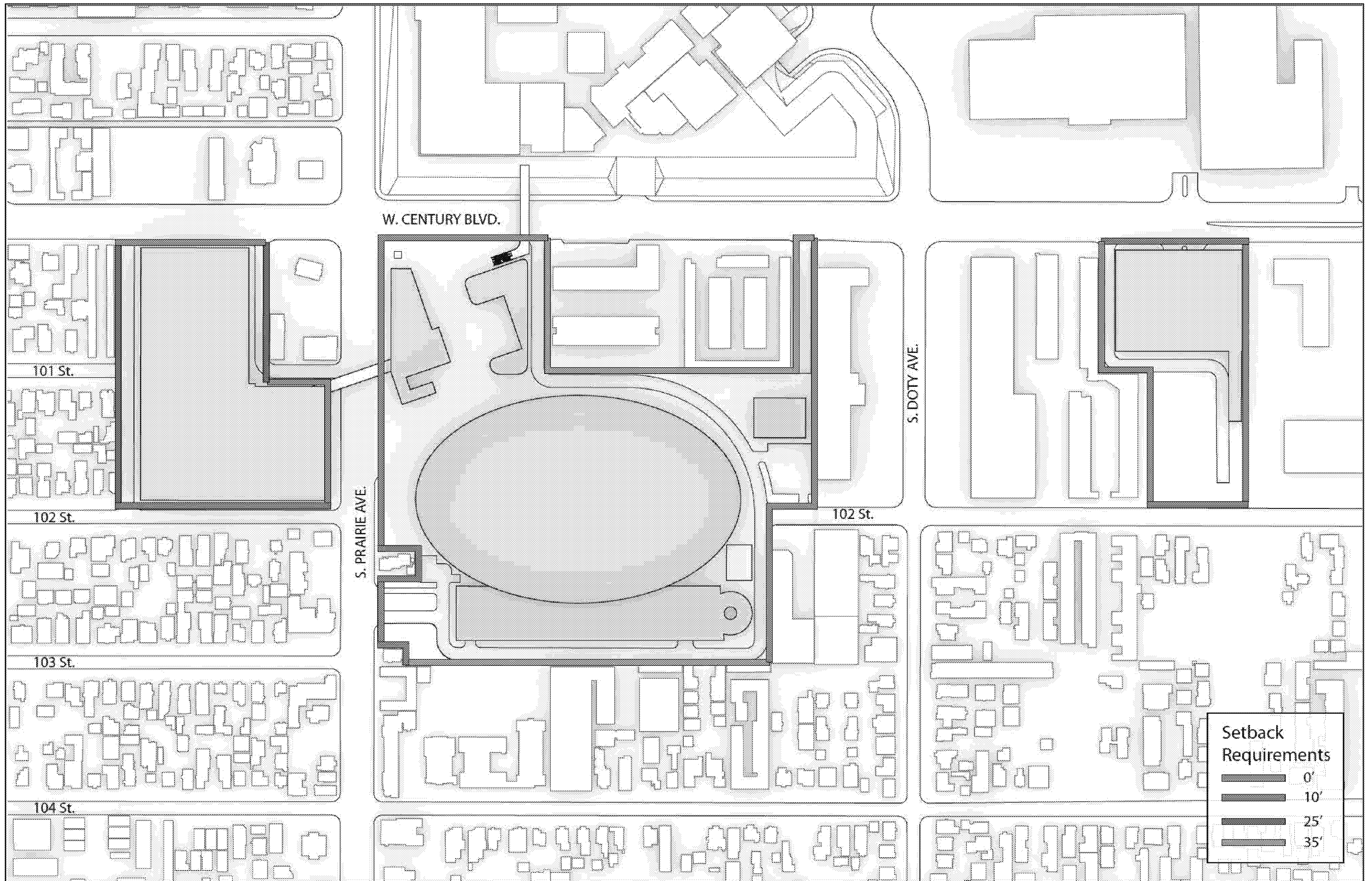


Figure 1.1 Minimum Building Setbacks

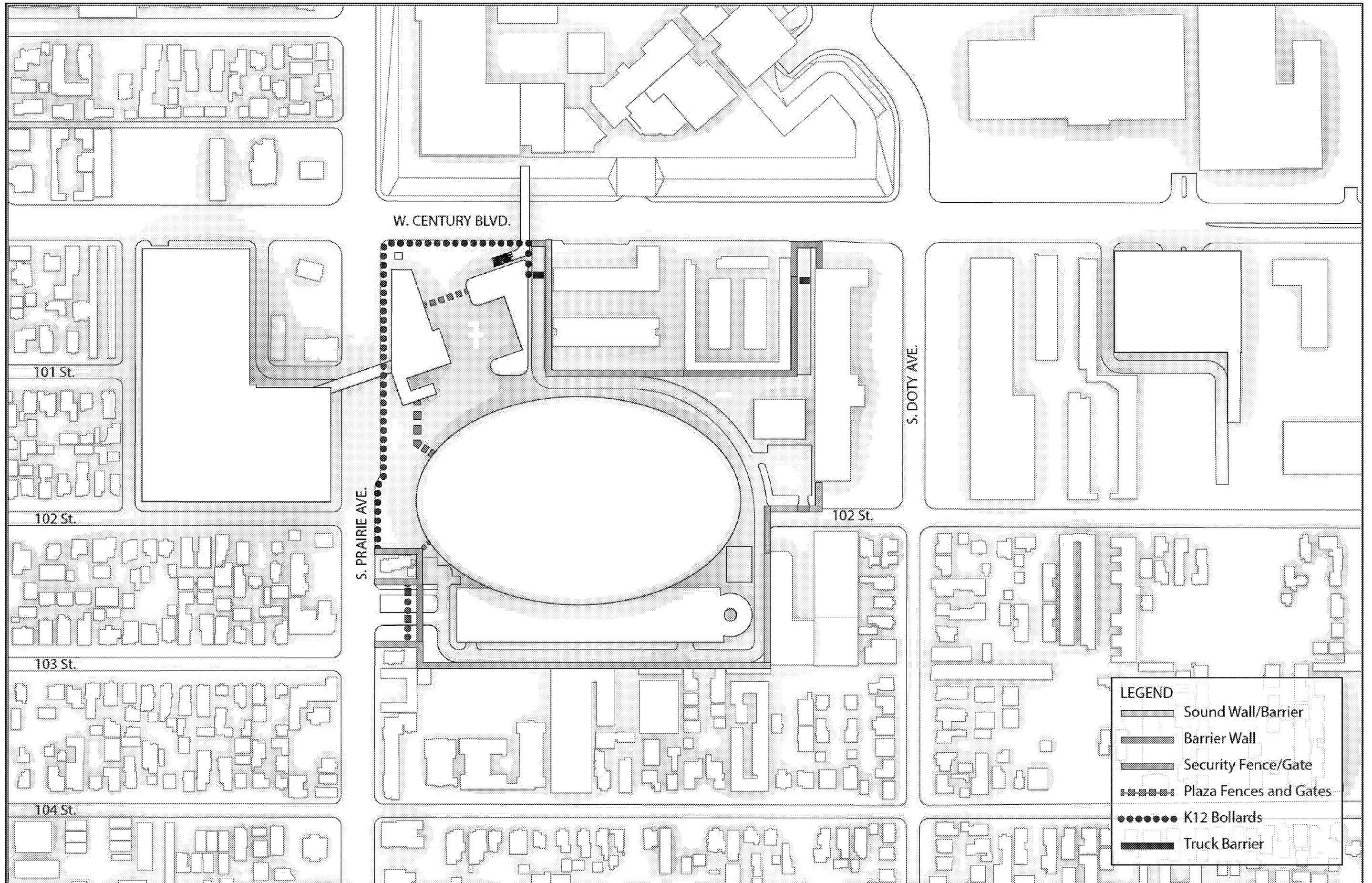
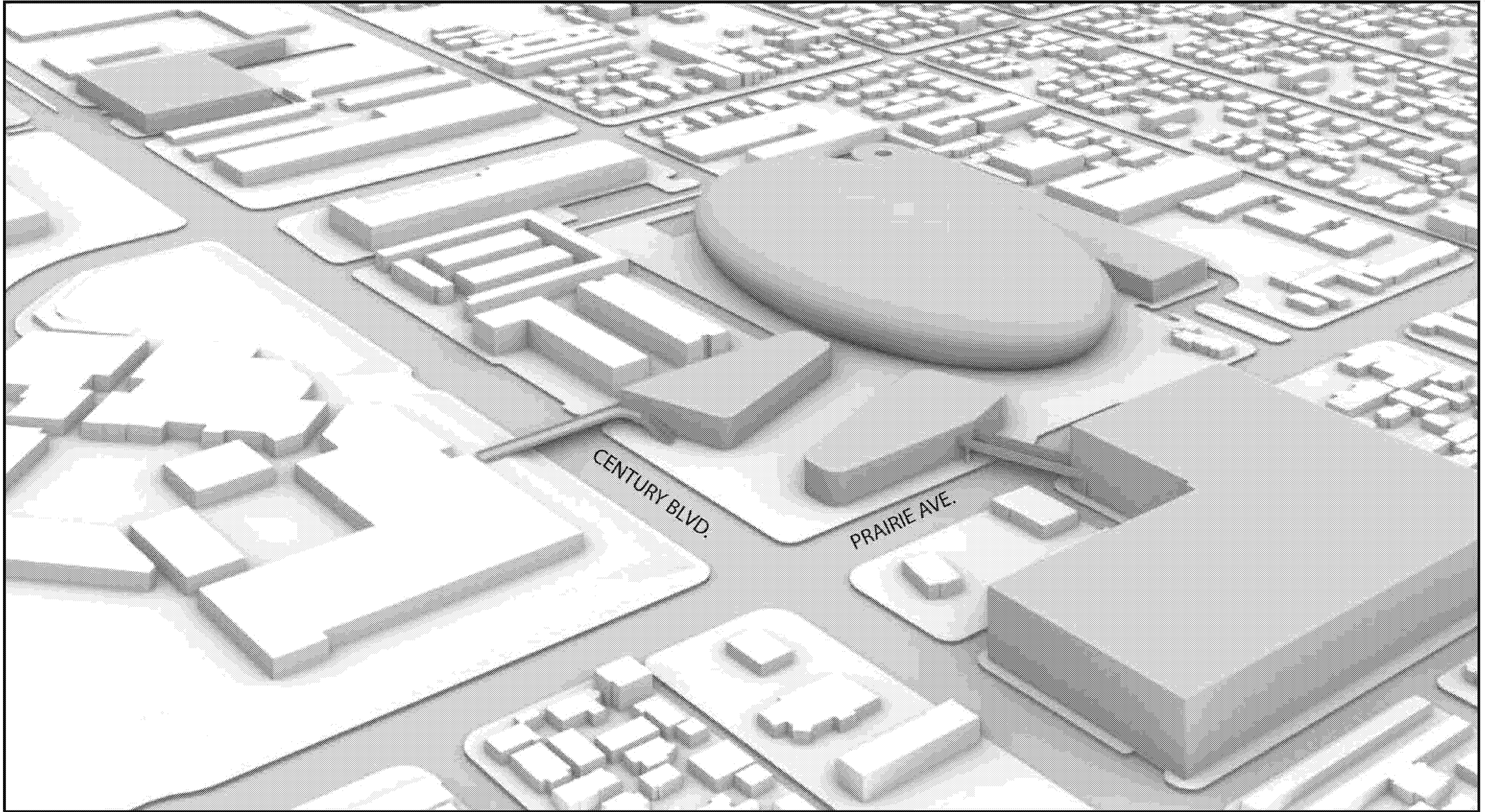


Figure 1.3 Fences and Walls



*Figure 2.1 Massing Concept*



Figure 2.2 Sports and Entertainment Complex Height

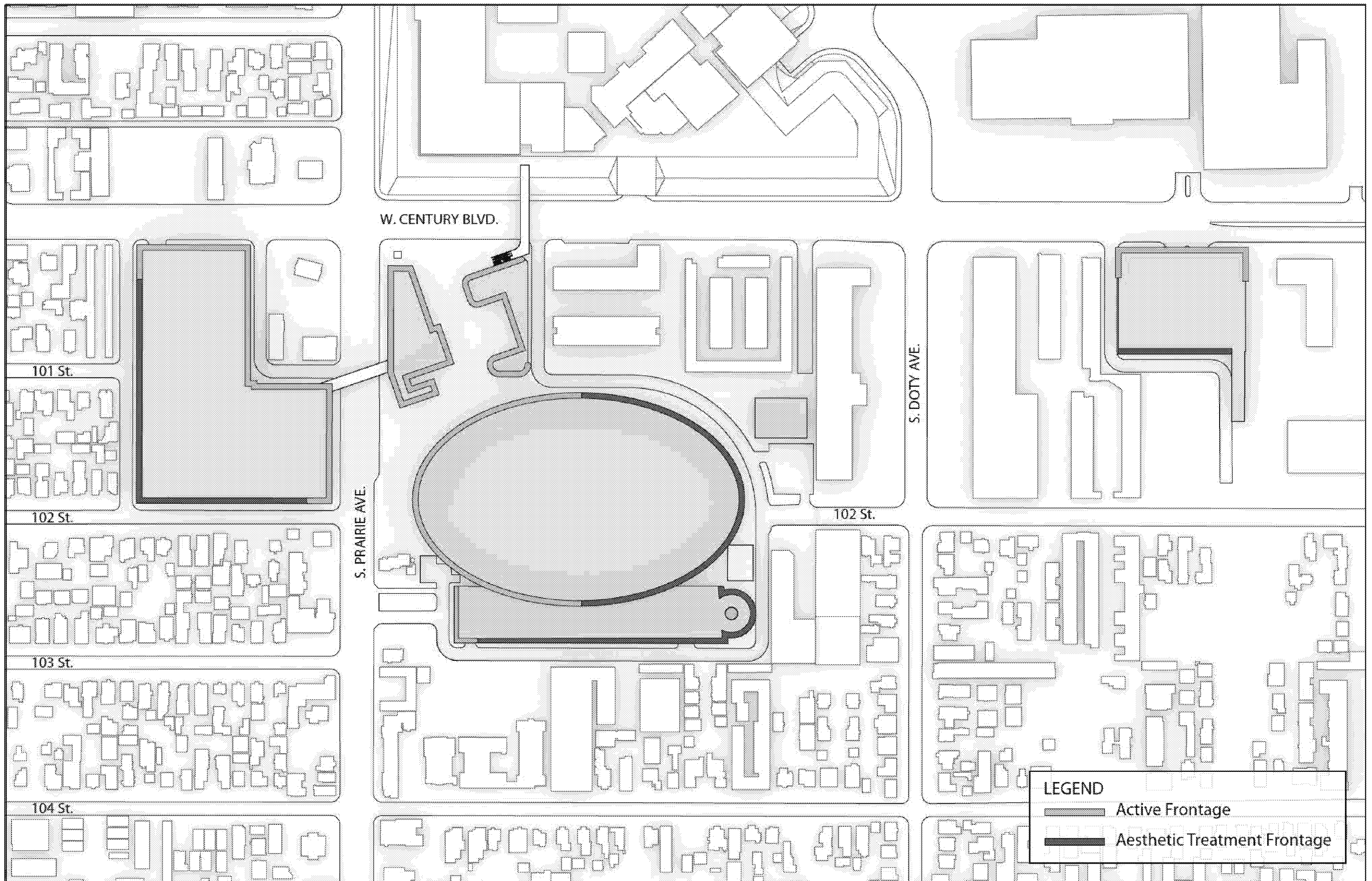
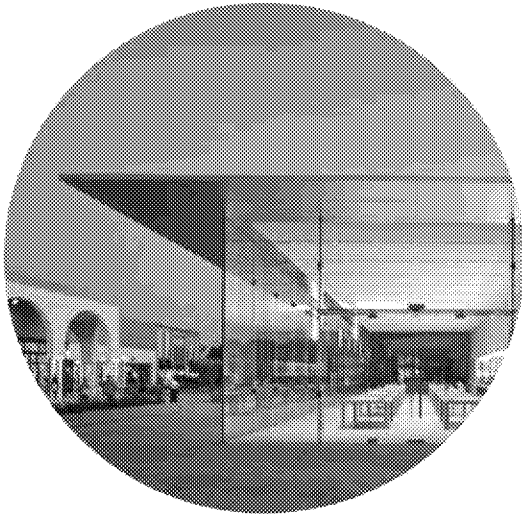
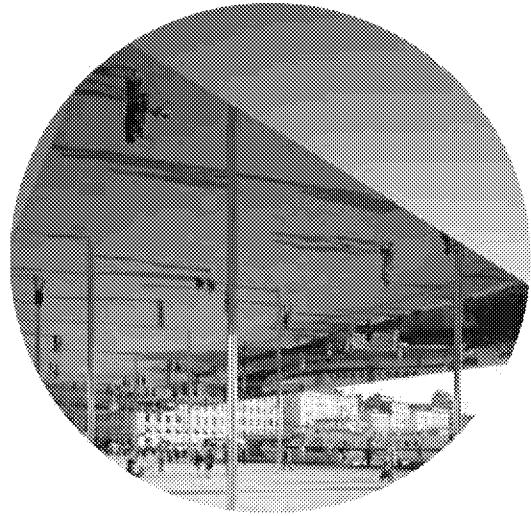


Figure 2.3 Frontages



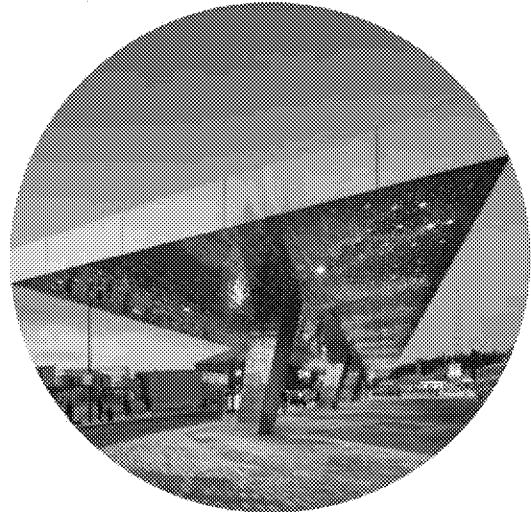
Suspended Canopy



Floating Canopy over Glass Facade



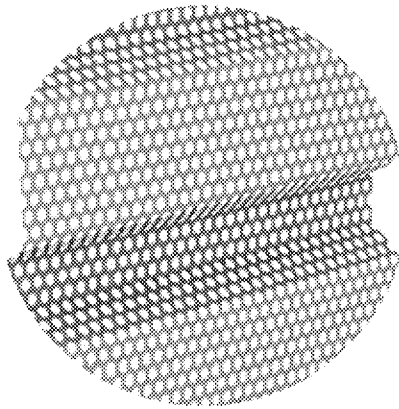
Architecturally Expressed Roofline



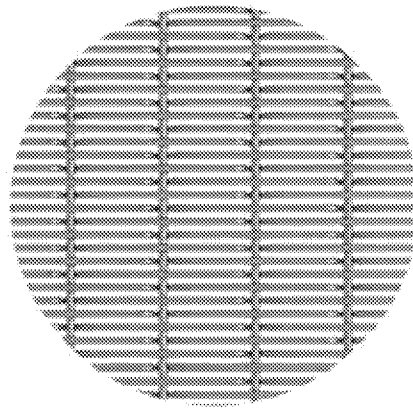
Suspended Roof Mass

Figure 2.4 Roofline and Profile

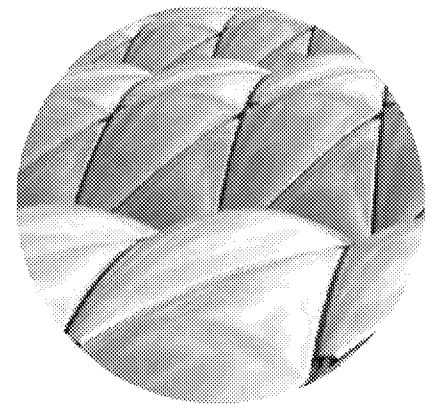




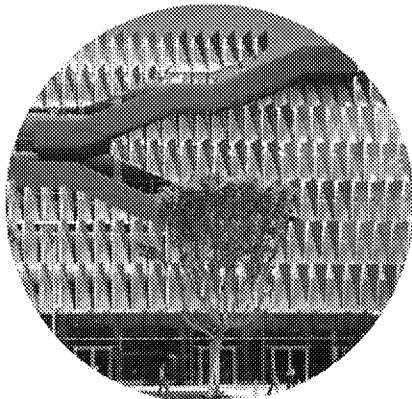
Perforated Screen



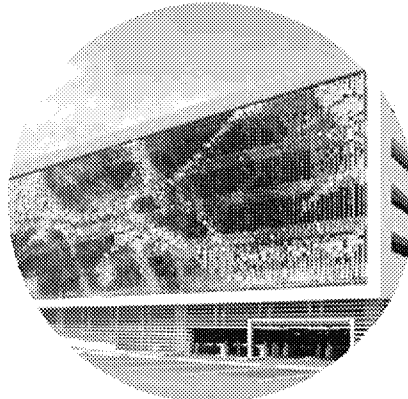
Woven Metal Mesh



ETFE



Varied Use of Colors



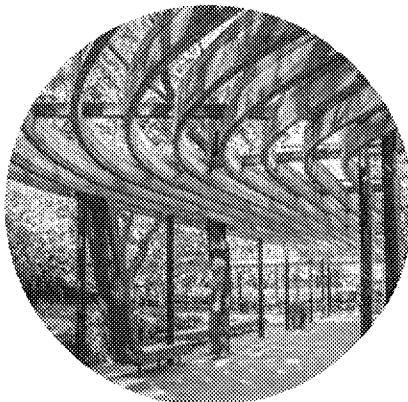
Dynamic Art



Green Screens



Express Unique Vocabulary



Durable metal/wood

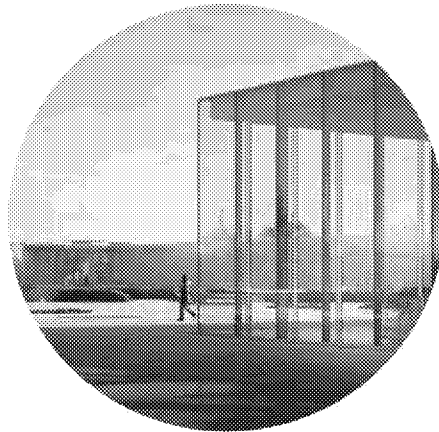


Creative use of metals

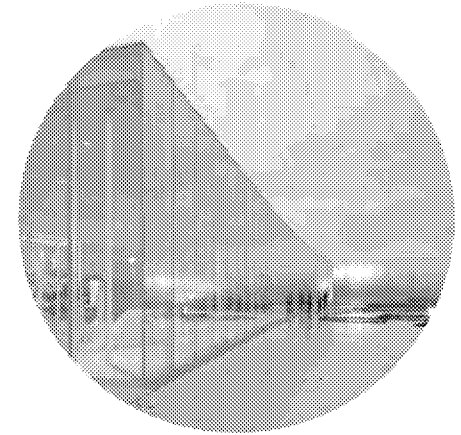
Figure 2.5.1 Building Materials and Treatments



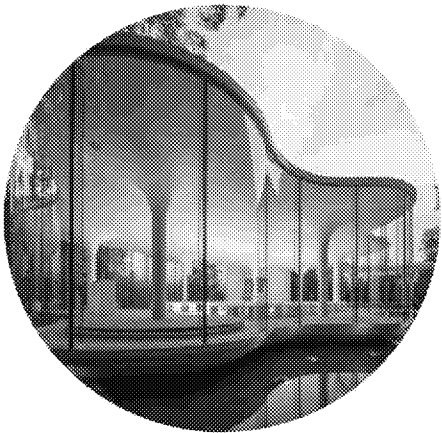
Rectangular with Expressed Mullions



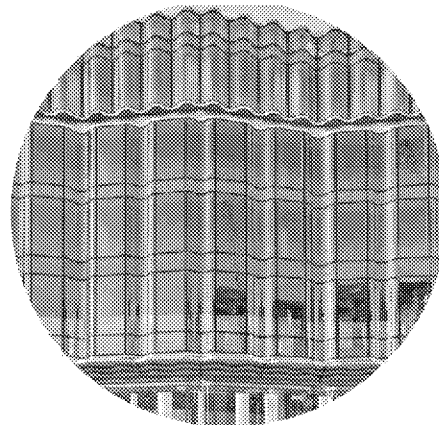
Rectangular with Understated Mullions



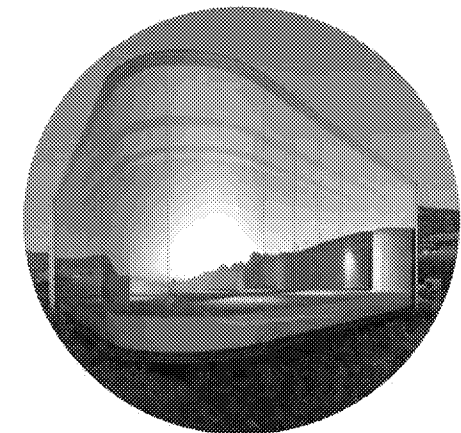
Rectangular with Hidden Mullions



Smooth Curved Facade With Glass Mullions

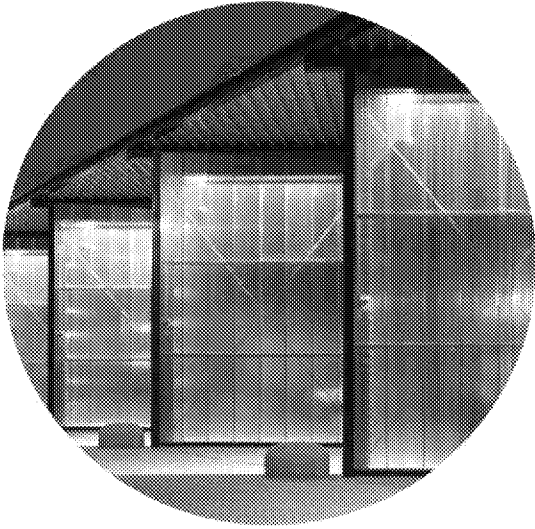


Articulated Curves with Expressed Mullions

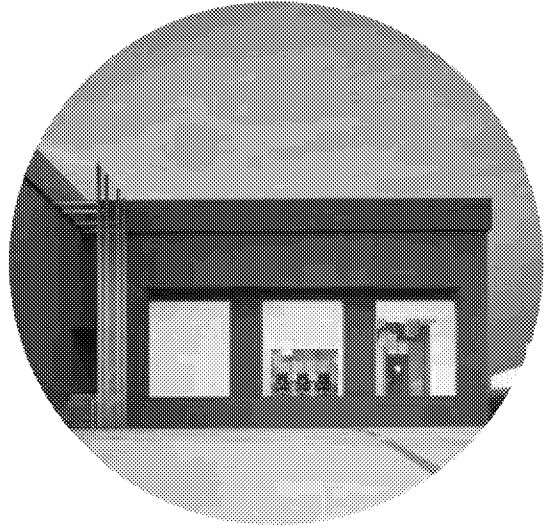


Smooth Curves with Hidden Mullions

Figure 2.5.2 Glass Facades



Creative Use of Materials



Clean Design



Loading Gates

Figure 2.6 Screening

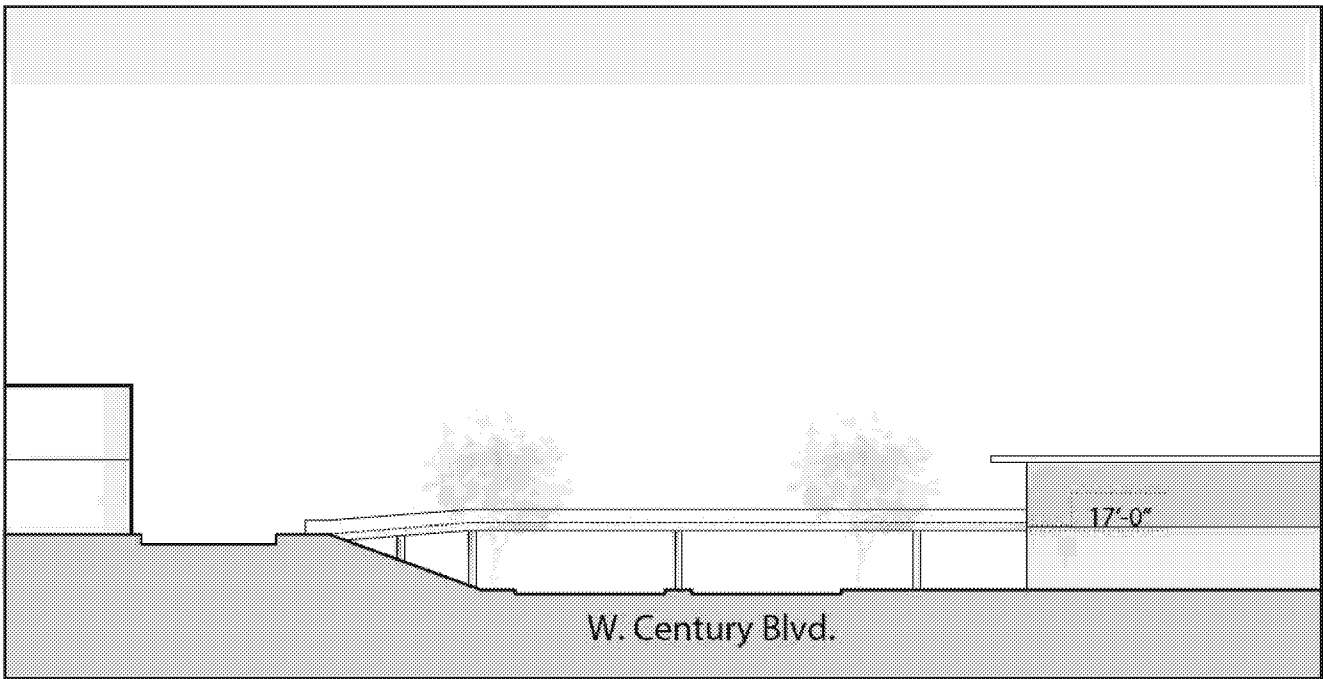
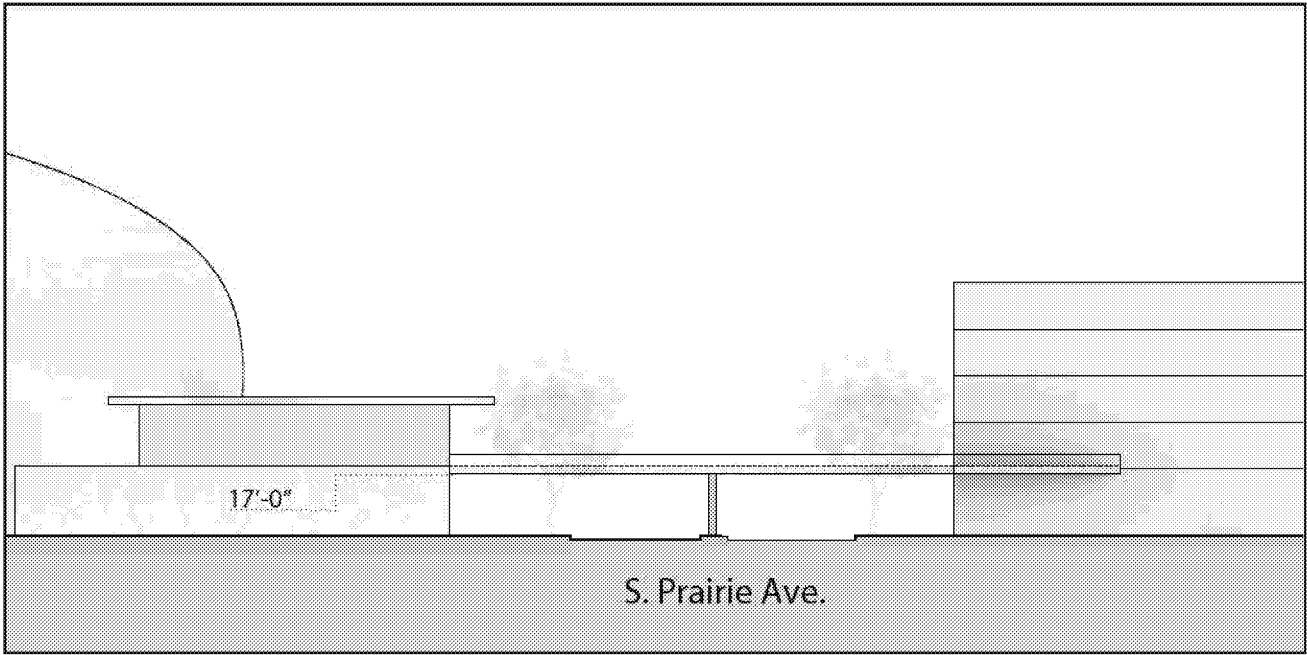


Figure 2.7 Pedestrian Bridges

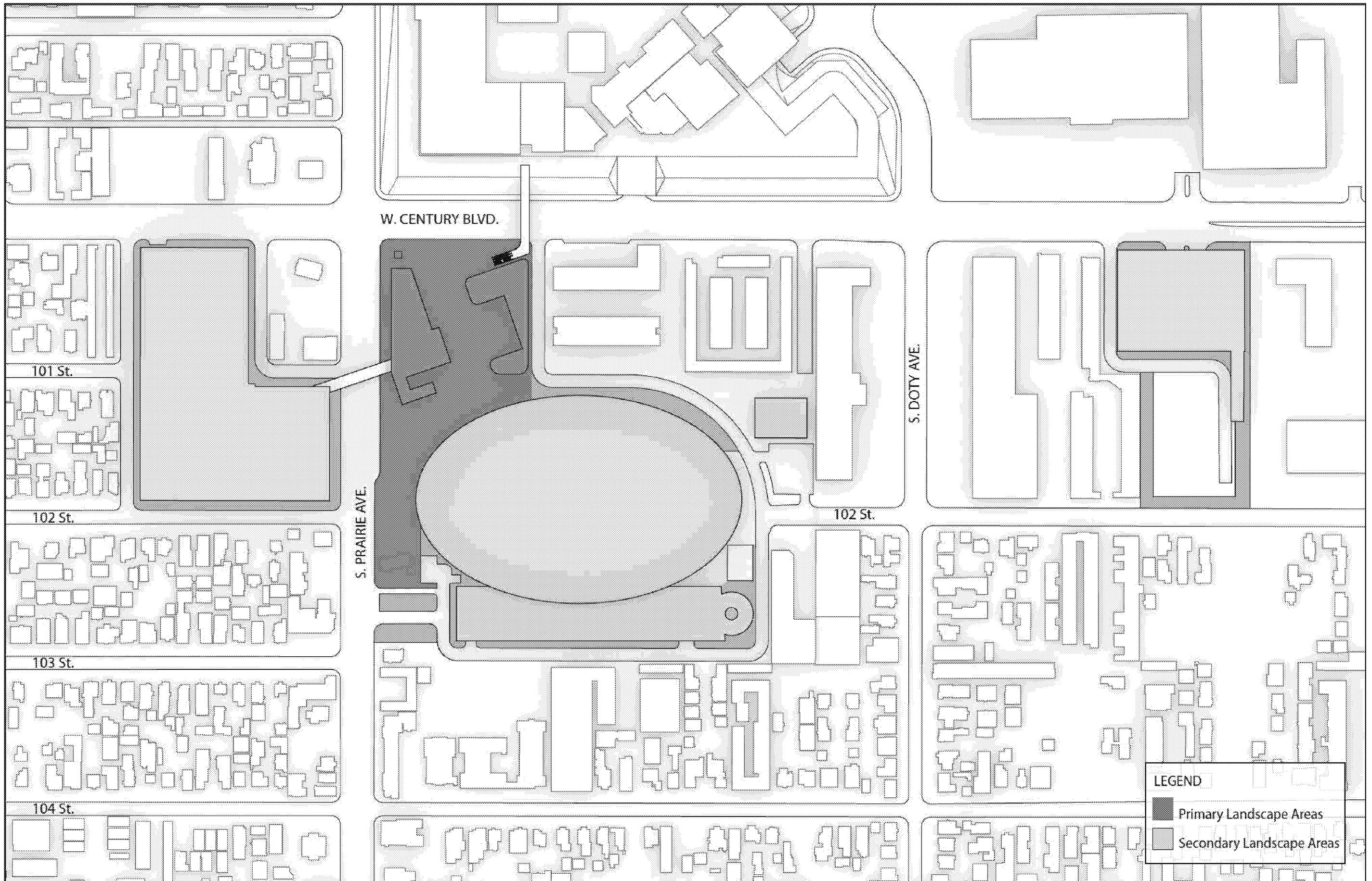


Figure 3.1 Landscape Design Areas

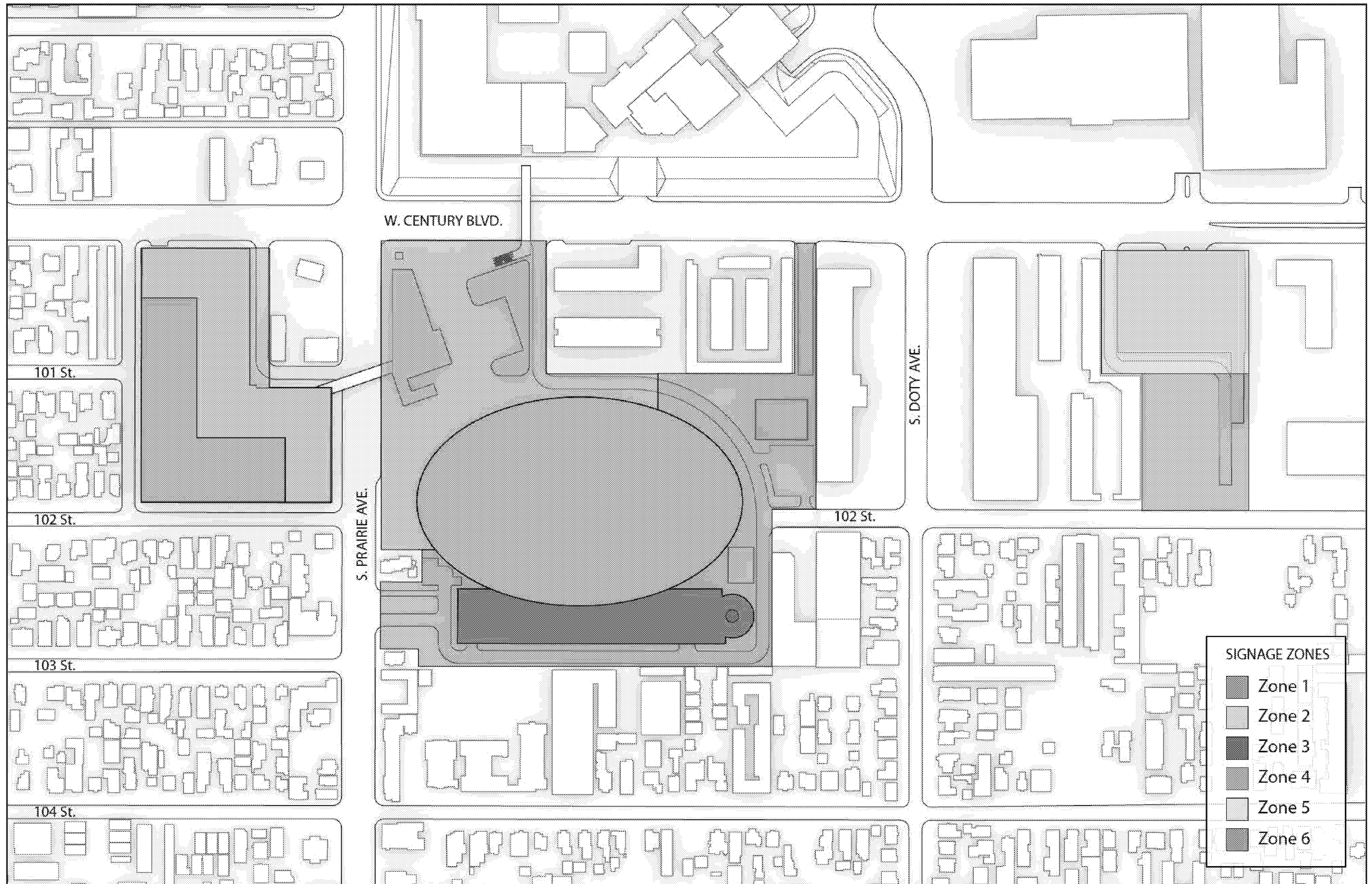


Figure 4.1 Sports and Entertainment Complex Sign Zones

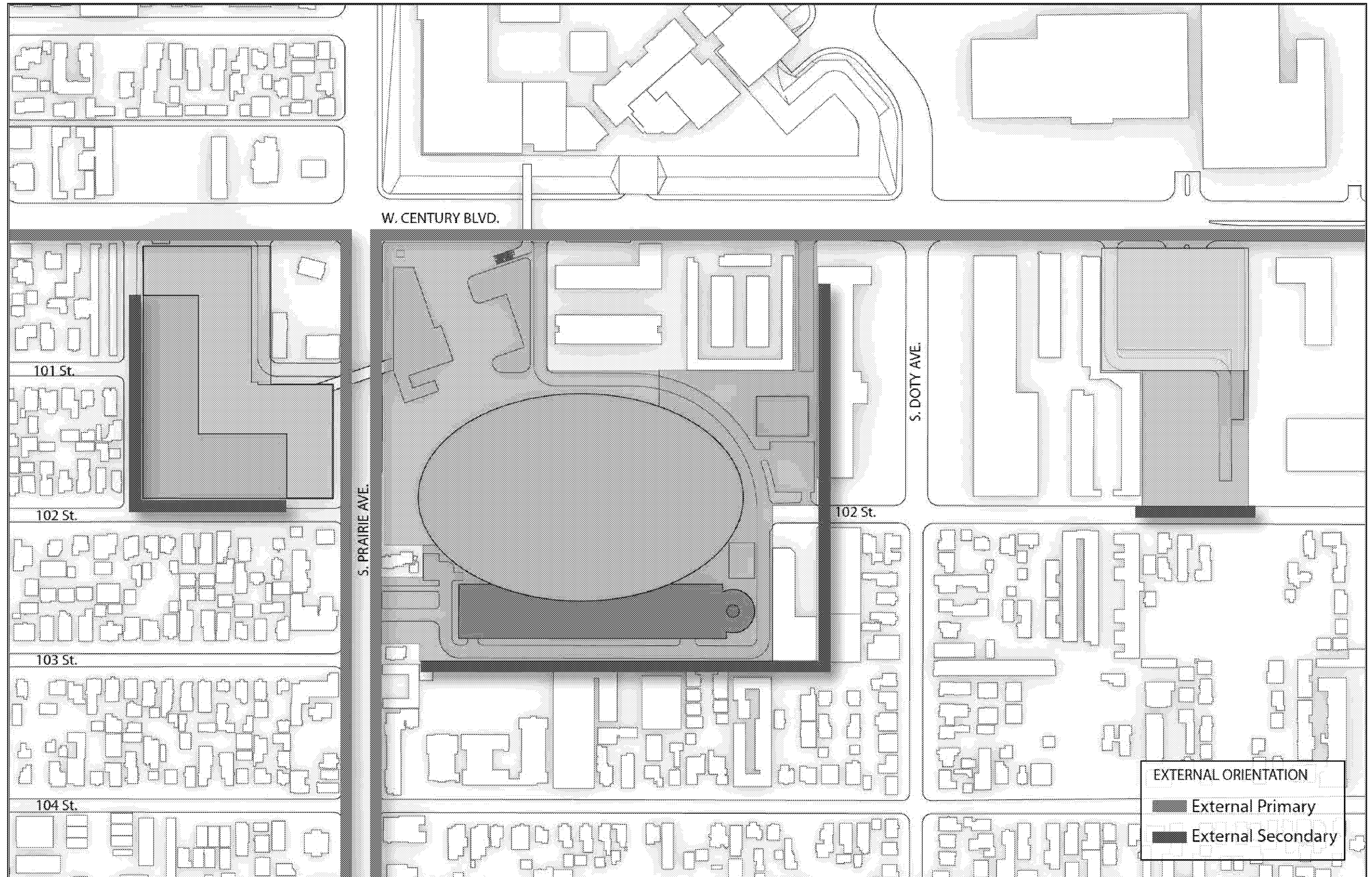
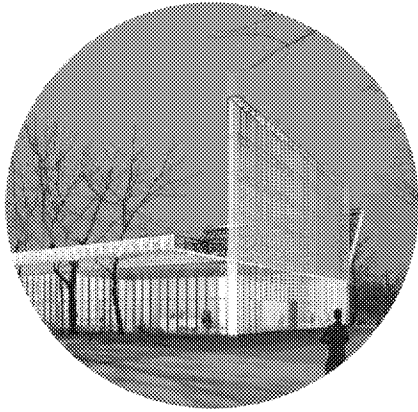
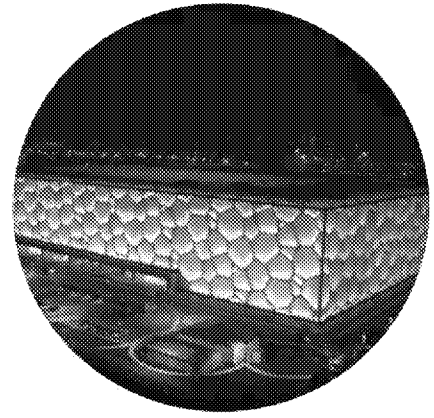


Figure 4.6 External Orientation



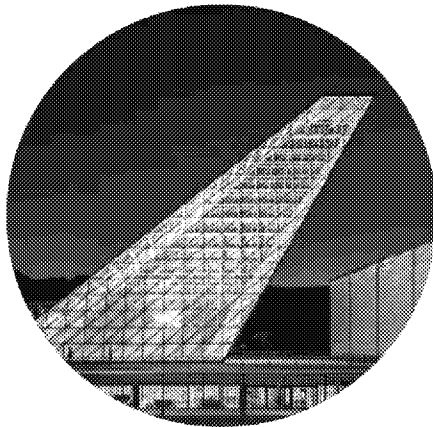
Architectural Lighting



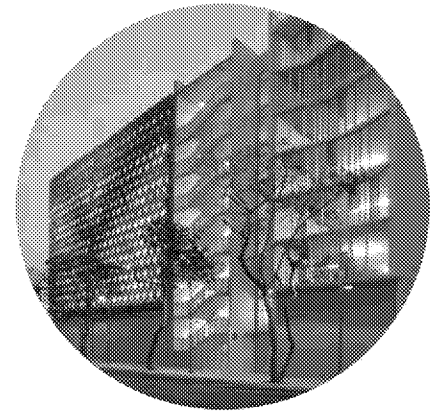
Facade Lighting



Well Lit Gathering Spaces



Architectural Element Highlighting



Shielded Interior Lighting



Architecturally Lit Steps



Shielded Path Lighting



Creative Wayfinding Lights

Figure 5.1 Lighting



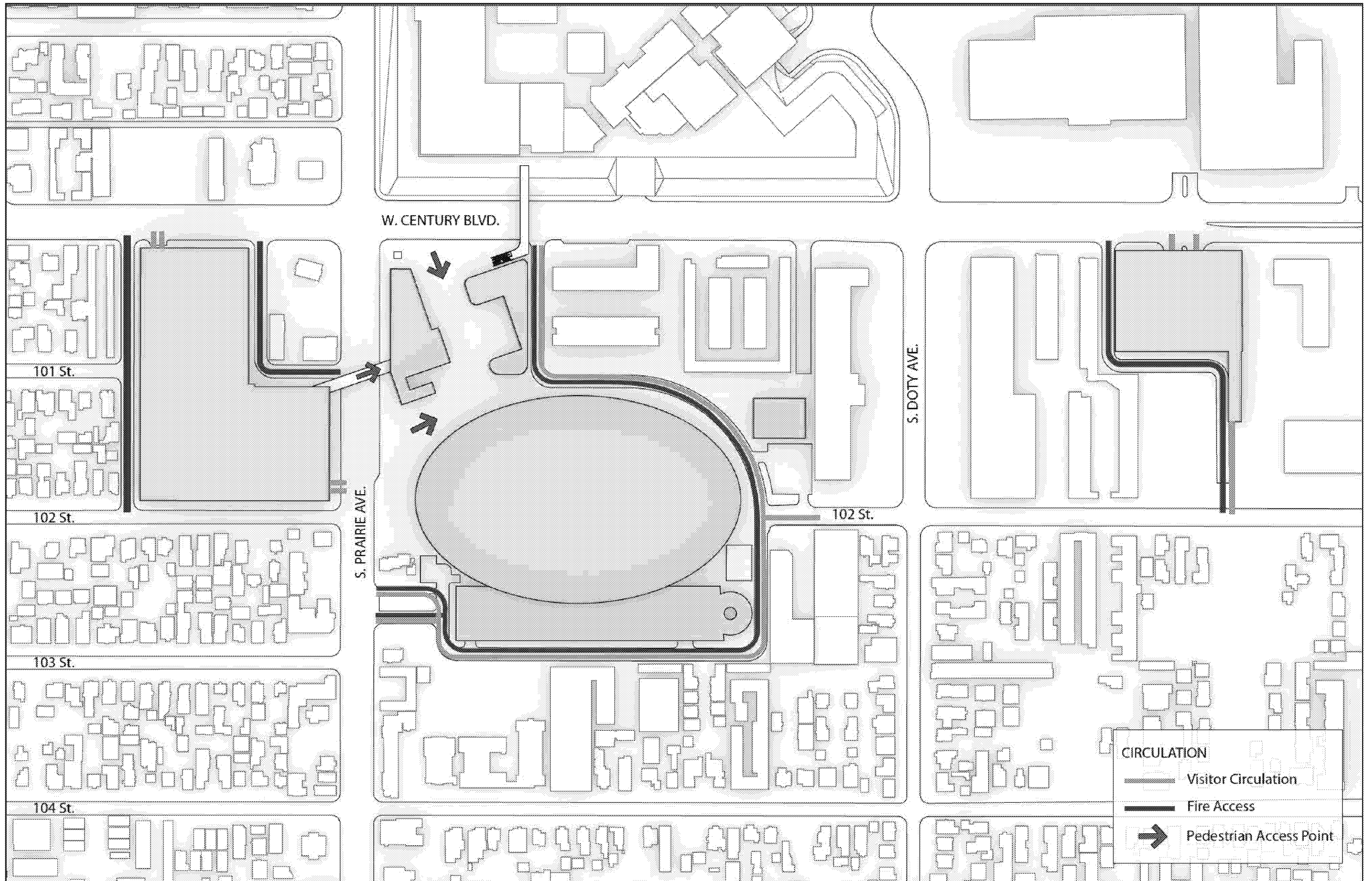
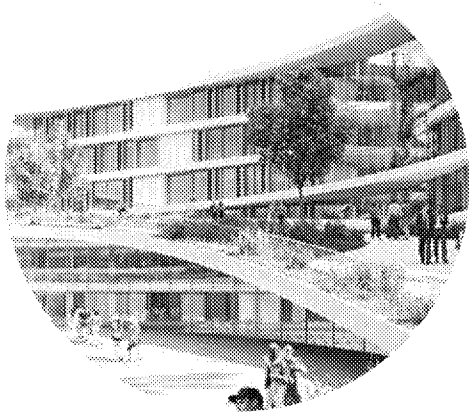


Figure 6.1 Circulation



Landscape Integration with Paths



Variety in Program Scales



Pedestrian Scale Frontage and Walks



Transparent Facades interacting with Exterior Spaces



Pedestrian Scale Lighting

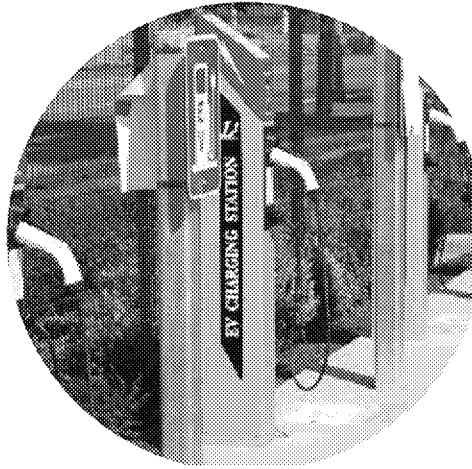


Pedestrian Scale Steps/Seating

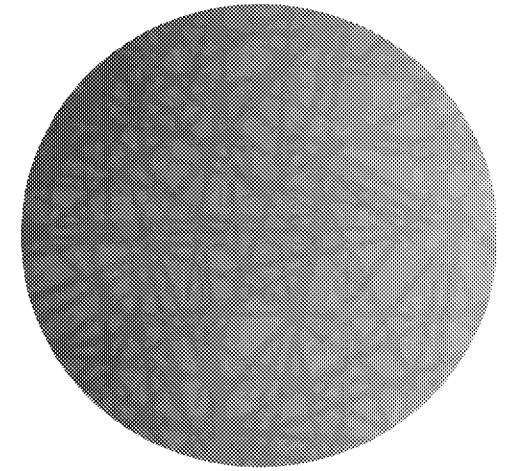
Figure 6.3 Pedestrian Features



Integrated Rooftop Solar Panels



Electric Vehicle Charging Station



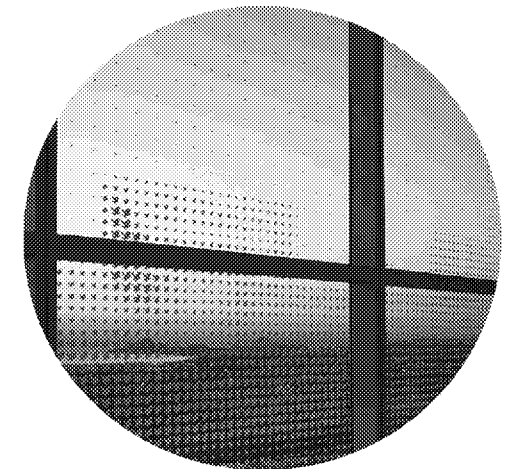
UV Patterned Glass



Roof Structure Solar Panels



Clearly Labeled EV Vehicle Parking



Glass with Frit Pattern

Figure 9.2 Solar Panels

Figure 9.3 Electric Vehicle Charging

Figure 9.8 Bird Collision Deterrence

# PART 3: SEC INFRASTRUCTURE PLAN

## Section 1 SEC Infrastructure Plan Overview

### 1.1 SEC Infrastructure Plan

This SEC Infrastructure Plan will govern the construction and development of infrastructure for the Project in accordance with the other Project Approvals, including the SEC Design Guidelines. Except as provided in the SEC Design Guidelines and as agreed to by the City and Developer, no on site or off site Infrastructure Improvements ("Infrastructure") beyond what is described herein, and such other Infrastructure as may be mutually agreed to by the City and Developer, will be required for development of the Project or will be constructed by the Developer.

This SEC Infrastructure Plan describes all Infrastructure improvements to be provided by Developer, at Developer's cost, in accordance herewith for the Project. While some Infrastructure improvements to be provided by City Agencies or other governmental agencies, may be described, their inclusion herein is not intended to be all inclusive of all Infrastructure improvements to be provided by City Agencies or other governmental agencies. A condition precedent to Developer's performance under this SEC Infrastructure Plan is the obtaining of all requisite approvals.

This SEC Infrastructure Plan establishes the design standards, construction standards, criteria and specifications of Infrastructure for the Project, including, without limitation, streets, and Infrastructure within the street right of way or easements including storm water, sanitary sewers, domestic water, reclaimed water, and all other Infrastructure. The precise location and final design of Infrastructure improvements consistent with this SEC Infrastructure Plan including intersection, street segment, wet and dry utilities, and other Infrastructure improvements will be determined during plan check and permit processing.

The dedication, acquisition and acceptance of streets and other Infrastructure improvements will occur through separate improvement plans and permits, parcel and tract maps, offers of dedication and easements. Other than as provided in the DDA, no real property is required to be acquired to construct the Infrastructure described in this SEC Infrastructure Plan.

The ability to construct and dedicate Infrastructure improvements for acquisition and acceptance by other regulatory agencies with jurisdiction such as, as applicable, Cal Trans, the City of Los Angeles, the County of Los Angeles or the City of Hawthorne, is contingent upon the review and approval of those other regulatory agencies. City will, in accordance with the Development Agreement, reasonably cooperate with requests by Developer to assist in obtaining such regulatory approvals, permits and actions from such other agencies that are necessary or desirable to effectuate and implement development of Project Infrastructure.

City will not require performance or payment bonds or other security for the completion of the Infrastructure improvements other than the typical general contractor bonds or contractor parent company guarantees.

## 1.2 Exhibits and Reference Documents

### Exhibits

Exhibit 1	Sewer Infrastructure Plan
Exhibit 2	Storm Drain Infrastructure Plan
Exhibit 3	Fire Protection Infrastructure Plan
Exhibit 4	Domestic Water Infrastructure Plan
Exhibit 5	Well Water Transmission Infrastructure Plan
Exhibit 6	Reclaimed Water Infrastructure Plan
Exhibit 7	Dry Utility Infrastructure Plan
Exhibit 8	New Inglewood Well No. 8 Plan
Exhibit 9	Inglewood Well No. 6 Demolition Plan
Exhibit 10	Circulation Plan, Traffic Signal and Bus Stop Plan
Exhibit 11	Street Vacations, Widening and Dedications Plan
Exhibit 12a	Street Sections
Exhibit 12b	Street Sections
Exhibit 12c	Street Sections
Exhibit 13a	La Cienega Blvd/ W Century Blvd
Exhibit 13b	Hawthorne Blvd / La Brea Ave/ W Century Blvd
Exhibit 13c	Yukon Ave / 104 <sup>th</sup> St
Exhibit 13d	S Prairie Ave / I-105 Off Ramp
Exhibit 13e	Manchester Blvd / La Brea Ave
Exhibit 13f	Crenshaw Blvd / Manchester Blvd
Exhibit 13g	Crenshaw Blvd / I-105 Off Ramp
Exhibit 13h	S Prairie Ave / 120 <sup>th</sup> St
Exhibit 13i	Crenshaw Blvd / 120 <sup>th</sup> St
Exhibit 13j	La Brea Ave / S Centinela Ave
Exhibit 13k	I-405 Northbound Off-Ramp / W Century Blvd
Exhibit 13l	La Cienega Blvd / S Centinela Ave
Exhibit 13m	104 <sup>th</sup> St / S Prairie Ave
Exhibit 13n	W Century Blvd / Felton Ave

## Section 2 Wet Utilities

Developer will install new storm drains, sanitary sewers, fire protection water main, domestic water mains, reclaimed water mains where needed and a well water transmission main. Construction will be done per approved plans and specifications prepared by the Developer's Project civil engineer and in a manner acceptable to the Developer and City and other Agencies having jurisdiction.

### 2.1 Sanitary Sewer

The Project's sanitary sewer system will be a combination of new public sewers to be installed in existing public right-of-way and new private on-site sewers as shown on Exhibit 1 (Sewer Infrastructure Plan). Developer's Project civil engineer will prepare plans and specifications for the work that shall be reviewed and approved by the City. The Department of Public Works will plan check and inspect the Infrastructure work in the public right of way and the Building Safety Division will plan check and inspect the onsite private work. Developer will provide public right-of-way traffic control plans to the City for approval. After approval of the plans and specifications and the payment of standard City fees, the City of Inglewood will cooperate with the Developer to provide encroachment permits to allow the installation of the Project's sewer Infrastructure without restrictions based on the age of the existing pavement in the public streets. The City of Inglewood will provide adequate inspection services to allow the work to proceed without delay. Developer and its contractors shall comply with the NPDES General Construction Permit, City Laws including Public Works Department Requirements for Public Works Permit.

Where sewer mains and laterals will be installed in the public rights-of-way, existing asphalt pavement will be removed and replaced per City Standard DS-12, and sidewalks, as necessary, per City Standard DS-7. The Project's sanitary sewer Infrastructure will tie into existing public sewer lines at six points unless revisions are requested by the Developer and approved by the City. The West Parking garage will be connected to the sewer main in South Prairie Avenue at West 102<sup>nd</sup> Street. The Arena area will be connected to existing sewer mains at two points: (1) Freeman Avenue and West 103<sup>rd</sup> Street and (2) West 102<sup>nd</sup> Street and East Boundary of Arena area. The Plaza area will be connected at South Prairie Avenue and 102<sup>nd</sup> Street. The East Parking Garage will be connected to a main in West Century Boulevard. Connection shall be per approved sewer study, typical of all installations and connections.

The existing sewer mains in the portions of West 101<sup>st</sup> Street and West 102<sup>nd</sup> Street right-of-way to be vacated for the Project will be removed and new terminal manholes will be installed at the ends of the mains that will remain in service.

New offsite sewer mains will be installed in the existing public rights-of-way in locations shown on Exhibit 1 (Sewer Infrastructure Plan) and will be owned, operated and maintained by the City of Inglewood. New onsite sewer mains and service laterals will be installed in locations shown on Exhibit 1 (Sewer Infrastructure Plan) and will be owned, operated and maintained by the Developer. The sewer Infrastructure will consist of PVC sewer pipes ranging in diameter from 4" to 12" as well as precast manholes, and cleanouts, wyes, connections to existing mains and other appurtenances designed by the Project Civil Engineer in final plans to be approved by the City.

The sewer connection for the hotel to be relocated on West Century Boulevard east of the East Parking Garage site would have a new connection to the sewer main in West 102<sup>nd</sup> Street east of South Doty Avenue, and it will require an easement through the Developer's East Parking Garage site. This hotel

sewer will be installed by the hotel developer under separate sewer plans, traffic control plans and permits to be obtained provided by the hotel developer, and it is not part of this SEC Infrastructure Plan.

## 2.2 Storm Drainage

The Project's storm drain Infrastructure will consist of tying into existing public storm drain lines, removing and relocating storm drain lines, and construction of new drain lines and supporting structures as shown on Exhibit 2 (Storm Drain Infrastructure Plan). Developer's Project Civil Engineer will prepare plans and specifications for the work that shall be reviewed and approved by the City Department of Public Works and/or Building Department. Developer will provide traffic control plans to the City for approval of work in existing public right-of-way. After approval of the plans and specifications and the payment of standard City fees, the City will cooperate with the Developer to provide encroachment permits to allow the installation of the Project's storm drain Infrastructure without restrictions based on the age of the existing pavement in the public streets. The City of Inglewood will provide adequate inspection services to allow the work to proceed without delay. Developer and its contractors shall comply with the City Laws, the Public Works Department Requirements for Public Works Permit, MS4 permit regulations, and the NPDES General Construction Permit. A SWPPP shall be prepared to the satisfaction of the City and the Los Angeles Regional Water Quality Control Board ("RWQCB") to ensure the prevention of substantial water quality degradation during construction of the Proposed Project. These plans shall be approved by the City and the Los Angeles RWQCB to confirm that these permit and regulatory requirements have been satisfied before construction commences on the site. Where storm drain Infrastructure will be installed in the public rights-of-way, existing asphalt pavement will be removed and replaced per City Standard DS-12, and sidewalks, as necessary, per City Standard DS-7.

The Project's storm drain system will tie into existing public storm drain lines at six points, unless revisions are requested by the Developer and approved by the City. The West Parking Garage area will be connected to existing public storm drain lines at three points: (1) West 101<sup>st</sup> Street approximately 57' west of the project boundary, (2) an existing public catch basin at the northwest corner of South Prairie Avenue and West 101<sup>st</sup> Street, (3) an existing public catch basin at the northwest corner of South Prairie Avenue and West 102<sup>nd</sup> Street. The Arena and Plaza areas will be connected to an existing public storm drain at Prairie and the southern access road just north of West 103<sup>rd</sup> street. The City relocated well site will be connected to an existing public reinforced concrete box storm drain at the intersection of West 102<sup>nd</sup> Street and South Doty Avenue. The East Parking Garage site will be connected to an existing public storm drain that traverses West 102<sup>nd</sup> Street approximately 230' east of the centerline of South Doty Avenue.

New offsite 18" and 24" reinforced concrete storm drains and precast manholes will be installed in the existing public rights-of-way in locations shown on Exhibit 2 (Storm Drain Infrastructure Plan) and will be owned, operated and maintained by the City. With the exception of the new Well Site, new onsite storm drains ranging from 8" to 24" diameter shall be HDPE WT Pipe by ADS or approved equal and installed and tested per Public Works Green Book standard. The Well Site storm drain will be reinforced concrete and will be owned, operated, and maintained by the City. All other on-site storm drain mains, service laterals and appurtenances will be installed in locations shown on Exhibit 2 (Storm Drain Infrastructure Plan) and will be owned, operated and maintained by the Developer.

To meet City-wide NPDES and MS<sub>4</sub> permit requirements, Developer will install bio filtration systems in landscaped areas throughout the Project site. Bio filtration features will implement best management practices (BMPs) and will include features such as bio filtration planters and bio swales, and proprietary devices. The proposed bio filtration systems will be designed to capture site runoff from roof drains and surface runoff, treat the runoff through biological reactions within the planter soil media. Underground pre-cast detention basin pretreatment structures will be constructed in the West Parking area, Arena Site and Arena Site Parking Structure, East Parking Garage Site as shown on [Exhibit 2](#) (Storm Drain Infrastructure Plan) to lower peak flow rates to LA County approved allowable levels.

Storm Drain Improvements, bio filtration systems and detention basin pretreatment structures for the hotel to be relocated on West Century Boulevard east of the East Parking Garage Site would require an easement to be provided by Developer through the Developer's East Parking Garage Site. These improvements are not part of this SEC Infrastructure Plan. The hotel developer will be responsible for obtaining permits and constructing the storm drain improvements for the hotel site, including separate storm drain plans, traffic control plans and other permits.

### 2.3 Fire Protection Infrastructure

The Project's fire protection system will be a combination of new public water mains and fire hydrants to be installed in existing public right-of-way and new private on-site water mains and fire hydrants installed on site as shown on [Exhibit 3](#) (Fire Protection Infrastructure Plan). Developer's Project civil engineer will prepare plans and specifications for the work that shall be reviewed and approved by the Golden State Water Company and City Department of Public Works and/or Building Department. Developer will provide traffic control plans to the City for approval of work in existing public right-of-way. After approval of the plans and specifications and the payment of standard City fees, the City of Inglewood will cooperate with the Developer to provide encroachment permits to allow the installation of the Project's fire protection infrastructure without restrictions based on the age of the existing pavement in the public streets. The Golden State Water District, where applicable, will inspect the installation of the water mains and appurtenances in the public right-of-way including the water meters and the City will inspect pavement repairs. The Inglewood Building Safety Division will inspect on site work. Developer and their contractors shall comply with the NPDES General Construction Permit, Inglewood Municipal Code regulations, and the Public Works Department Requirements for Public Works Permit.

Where fire protection water mains and appurtenances will be installed in the public rights-of-way, existing asphalt pavement will be removed and replaced per the Standard Plans for Public Works Construction Standard Plan 133-3.

The Project's fire protection infrastructure will tie into existing public water mains at nine points. Two new fire hydrants will connect to the Golden State Water Company (GSWC) water main on the west site of Prairie Avenue and will be extended to the east side of the street. Two connections will be made to the GSWC water main at West 101<sup>st</sup> Street on the west side of the West Parking Garage Site and private mains will be extended north and south to new private fire hydrants. The southern main will extend to West 102<sup>nd</sup> Street and tie into an existing water main there. Two new fire water mains will connect to the GSWC water main on the west site of South Prairie Avenue and will be extended across the street. A new public fire hydrant will be installed on the east side of South Prairie Avenue just south of West 101<sup>st</sup> Street. Two private fire water mains will be extended into the Arena and Plaza areas to form a



loop around the new arena complex. This private main will feed private fire hydrants. A fire protection water main and private fire hydrant on the west side of the East Parking Garage will connect to the GSWC water main in West Century Boulevard.

The fire protection water main for the hotel to be relocated on West Century Boulevard east of the East Parking Garage Site will be installed by the hotel developer under separate sewer plans, traffic control plans and permits to be obtained provided by the hotel developer, and it is not part of this SEC Infrastructure Plan.

## 2.4 Domestic Water Infrastructure

The Project's domestic water system will be a combination of new public water mains and appurtenances to be installed in existing public right-of-way and new private on-site water mains and appurtenances installed on site as shown on Exhibit 4 (Domestic Water Infrastructure Plan). Developer's Project civil engineer will prepare plans and specifications for the work that shall be reviewed and approved by the Golden State Water Company (GSWC) and City of Inglewood Department of Public Works and/or Building Department. Developer will provide traffic control plans to the City for approval of work in existing public right-of-way. After approval of the plans and specifications and the payment of standard City fees, the City will cooperate with the Developer to provide encroachment permits to allow the installation of the Project's domestic water Infrastructure without restrictions based on the age of the existing pavement in the public streets. GSWD will inspect the installation of the water mains and appurtenances in public right-of-way to the meter and the City of Inglewood will inspect pavement repairs. The Inglewood Building Safety Division will inspect the on-site private water mains and appurtenances. Developer and their contractors shall comply with the NPDES General Construction Permit, Inglewood Municipal Code regulations, and the Public Works Department Requirements for Public Works Permit.

The existing domestic water mains in the portions of West 101<sup>st</sup> Street and West 102<sup>nd</sup> Street rights-of-way to be vacated for the Project will be removed and the remaining ends of the mains that will remain in service will be capped.

Where domestic water mains and appurtenances will be installed in the public rights-of-way, existing asphalt pavement will be removed and replaced per the Standard Plans for Public Works Construction Standard Plan 133-3.

The Project's domestic water infrastructure will tie into existing public water mains at seven points. The West Parking Garage Site will connect to the existing GSWC water main in West 101<sup>st</sup> Street with a 2-inch service with backflow preventer and meter. Three new domestic water mains will connect to the GSWC water main on the west site of South Prairie Avenue and will be extended across the street to backflow preventers. The two connections on the north side of Prairie Avenue will loop through the Plaza Area to service plaza buildings. The connection to the south will loop through the southern access road and connect to the existing main at West 102<sup>nd</sup> Street and the eastern Arena area boundary with a backflow preventer. This main will service the arena complex. The East Parking Garage Site will connect to an existing GSWC water main in West Century Boulevard with a domestic water service, back flow preventer, and meter on the west side of the site.

A domestic water service back flow preventer and meter for the hotel to be relocated on West Century Boulevard east of the East Parking Garage Site will be installed by the hotel developer under separate sewer plans, traffic control plans and permits to be obtained provided by the hotel developer, and it is not part of this SEC Infrastructure Plan.

## 2.5 Well Water Transmission Main Infrastructure

The City's 27" diameter water well transmission main in the portion of the West 102<sup>nd</sup> Street right-of-way to be vacated for the Project will be removed and a new pipeline will be installed in an on-site easement in the Arena southern access road and then northerly along South Prairie Avenue to the reconnect to the existing main in West 102<sup>nd</sup> Street as shown on Exhibit 5 (Well Water Transmission Infrastructure Plan). The new main will be installed and connected with the least interruption to service as practical. The new main will be in operation prior to the demolition of the existing main.

Developer's Project civil engineer will prepare plans and specifications for the work that shall be reviewed and approved by the City Department of Public Works. Developer will provide traffic control plans to the City for approval of work in existing public right-of-way. After approval of the plans and specifications and the payment of standard City fees, the City of Inglewood will cooperate with the Developer to provide encroachment permits to allow the installation of the work without restrictions based on the age of the existing pavement in the public streets. Developer and their contractors shall comply with the NPDES General Construction Permit, City Laws, and the Public Works Department Requirements for Public Works Permit.

Where the well water transmission main will be installed in the public right-of-way, existing asphalt pavement will be removed and replaced per City Standard DS-12, and sidewalks, as necessary, per City Standard DS-7.

## 2.6 Reclaimed Water System

The Project's reclaimed water infrastructure shown on Exhibit 6 (Reclaimed Water Infrastructure Plan) will consist of a 2" connection to the existing West Basin Municipal Water District (WBMWD) transmission main on the east side of South Prairie Avenue across from West 101st Street. The connection will be fitted with the required backflow preventer and meter. Onsite private reclaimed water mains will be installed in the Arena area and Plaza area and may be connected to the West Parking Garage Site area via the pedestrian bridge.

Developer's Project civil engineer will prepare plans and specifications for the work that shall be reviewed and approved by the WBMWD, City Public Works and/or Building Department, and the Los Angeles County Health Department. Developer will provide traffic control plans to the City for approval of work in existing public right-of-way. After approval of the plans and specifications and the payment of standard City fees, the City of Inglewood will cooperate with the Developer to provide encroachment permits to allow the installation of the Project's reclaimed water infrastructure without restrictions based on the age of the existing pavement in the public streets. WBMWD will inspect the installation of the water mains and appurtenances in public right-of-way to the meter and the City of Inglewood will inspect pavement repairs. The Inglewood Building Safety Division will inspect the on-site private water

mains and appurtenances. Developer and their contractors shall comply with the NPDES General Construction Permit, City Laws, and the Public Works Department Requirements for Public Works Permit.

Where reclaimed water mains and appurtenances will be installed in the public rights-of-way, existing asphalt pavement will be removed and replaced per City Standard DS-12, and sidewalks, as necessary, per City Standard DS-7.

## Section 3 Dry Utilities

Dry Utility improvements including onsite and offsite electrical, natural gas, telephone, and cable T.V. utilities are identified on Exhibit 7 (Dry Utility Infrastructure Plan). Southern California Edison is the electricity provider, Southern California Gas Co provides natural gas, AT&T provide phone service and Spectrum Business is the primary cable provider. Work necessary to provide the joint trench for dry utilities (that lie in public streets and in the sidewalk area if at all possible) and onsite access roads, consists of trench excavation and installation of conduit ducts for telephone, cable, fiber optic, electrical, and gas (direct burial). Additionally, utility vaults, splice boxes, and backfill are included. The utility owner/franchisee (such as optic companies) will be responsible for installing facilities such as transformers and wire.

All necessary and properly authorized public utility improvements for which franchises are authorized by the City shall be designed and installed in the public right-of-way in accordance with City Laws in effect from time to time, and permits approved by City Public Works Department. Joint trenches or utility corridors will be utilized wherever feasible. The location and design of joint trenches/utility corridors in the right of way must be approved by City Public Works Department during the preparation of improvement plans.

### 3.1 Relocations to Maintain Existing Service

The dry utilities in the portions of West 101<sup>st</sup> Street and West 102<sup>nd</sup> Street Right-of-Way to be vacated for the Project will be removed. The dry utilities located in easements on the Project sites will be removed. Buildings to remain that take service from these utilities to be removed include:

- (A) Liquor Warehouse Market, 10025 S Prairie Ave, Inglewood, CA 90303: Electricity, Gas, Telephone, Cable T.V.
- (B) Sunshine Coin Laundry, 10023 S Prairie Ave, Inglewood, CA 90303: Electricity, Gas, Telephone, Cable T.V.
- (C) Single Family Detached Residence, 10226 S. Prairie Avenue, Inglewood, CA 90303: Telephone, Cable T.V.
- (D) Triplex Residence, 10204 S. Prairie Avenue, Inglewood, CA 90303: Telephone, Cable T.V.
- (E) Airport Inn Hotel, 3900 W. Century Boulevard, Inglewood, CA 90303: Telephone, Cable T.V.
- (F) Extra Space Storage, 3846 W. Century Boulevard, Inglewood, CA 90303: Telephone, Cable T.V.
- (G) Industrial Buildings, 3821 102<sup>nd</sup> Street, Inglewood, CA 90303 and properties to the east: Electricity.
- (H) Industrial Building, 10105 Doty Avenue, Inglewood, CA 90303: Telephone & Cable T.V.

Prior to disconnection of these active dry utilities to these users, new utilities to maintain service will be installed. Underground dry utilities will be installed in the public right-of-way in South Prairie Avenue, West 101<sup>st</sup> Street, West Century Boulevard, West 102<sup>nd</sup> Street, West 103<sup>rd</sup> Street, West 104<sup>th</sup> Street and the access road on the west side of the West Parking Garage Site. Above grade utilities will be installed on pole lines in West 104<sup>th</sup> Street, South Doty Avenue, and West 102<sup>nd</sup> Street. Underground dry utilities

will be installed in an easement on the Plaza area north access road to connect to the pole line at the southwest corner of the Airport Inn Hotel Property to utilities in West Century Boulevard. Underground dry utilities will be installed in an easement on the western north/south access road on the West Parking Garage Site to connect West 101<sup>st</sup> Street electrical service to West Century Boulevard. Plans will be submitted for City review prior to installation of utilities.

### 3.2 New Dry Utility Services

New dry utility electrical, telephone and cable TV service to the West Parking Garage Site will be taken from the existing overhead pole line on the north side of West 102<sup>nd</sup> Street.

New electrical service to the Arena Plaza areas will be from underground dry utilities that will be extended from the CE Lennox Substation on West 103<sup>rd</sup> Street, across South Prairie Avenue and extended in an easement on the Arena area south access road. A secondary electrical service will be extended from the Hawthorne Substation in a combination of above ground and underground facilities northerly along South Prairie Avenue to the easement on the Arena area south access road. New natural gas, telephone, and cable TV service to the Arena and Plaza areas will extend from existing facilities at South Prairie Avenue and will be extended in a joint trench along the southern access road. New onsite dry utility facilities would be terminated within a utility yard near the southeast corner of the Arena Site. Structures required to serve the Project site consist of switches, capacitor banks, multiple transformers, and metering equipment.

New dry utility service to the new relocated well site will be from the existing overhead pole line on West 102<sup>nd</sup> Street.

New dry utility service to the East Parking Garage will be from the existing overhead pole line on the north side of West 102<sup>nd</sup> Street and will require an underground service to be installed across West 102<sup>nd</sup> Street.

Dry utilities for the hotel to be relocated on West Century Boulevard east of the East Parking Garage site will be installed by the hotel developer under separate plans, traffic control plans and permits to be obtained by the hotel developer, and it is not part of this SEC Infrastructure Plan. Plans will be submitted to, reviewed by, and approved by the City.

## Section 4 Inglewood Water Well Relocation

The City owned and operated Inglewood Water Well No. 6 will be properly destroyed or properly abandoned, and a new Water Well No. 8 will be constructed to replace it as detailed in the City of Inglewood Well No. 8 Preliminary Design Report prepared by Tetra Tech and dated April 2018 ("Well Relocation PDR"). The new City owned, and operated Water Well No. 8 will be located on the southern third of the two parcel Well Relocation Site at 3818 West 102<sup>nd</sup> Street in Inglewood. The site plan for Well No. 8 is shown on [Exhibit 8](#) (New Inglewood Well 8 Plan).

The well will include water pumps and associated infrastructure that would be visible above ground, similar to the existing Water Well No. 6. No buildings are proposed. The ground surface would be covered with gravel or crushed stone, with a 15-foot wide paved driveway adjacent to the eastern side of the proposed well location for vehicle access.

A 6-foot tall concrete masonry unit security fence with automated sliding access gate would enclose the well site, with additional security provided via security cameras connected to the City of Inglewood via the pump station telemetry system. The well site will not include a permanent onsite backup generator.

The well would be drilled approximately 750 feet below ground surface, with a submersible pump to reduce noise to nearby residences. The Well No. 8 raw water discharge piping would connect to the existing City of Inglewood raw water main, located immediately in front of the proposed site on West 102<sup>nd</sup> Street, as shown on [Exhibit 5](#) (Well Water Transmission Infrastructure Plan). An existing utility pole located 50 feet east of the Well Relocation Site on West 102<sup>nd</sup> Street is expected to be the connection location to provide the power for the new well facility.

An 18" diameter reinforced concrete well waste discharge line will connect to a LA County Flood Control District (LACFCD) reinforced concrete box located at the intersection of West 102<sup>nd</sup> Street and South Doty Avenue.

Inglewood Well No. 6 will be properly removed as described in the Well Relocation PDR. Existing site improvements will be demolished and removed as shown on [Exhibit 9](#) (Inglewood Well 6 Demolition Plan).

With the City of Inglewood's concurrence, Developer hired Tetra Tech as engineer of record for this well demolition and new well relocation project to provide services including project management, preliminary design, permitting, well design & equipping construction documents, bid phase assistance, and construction phase assistance for both removal of existing well and construction of a new replacement well.

The City of Inglewood will review and approve the plans and specifications and will bid out the work and hire the contractors to complete the Destruction of Well No. 6 and the construction of Well No. 8 and all required associated infrastructure and facilities. Developer will help coordinate plan reviews and permits and will pay for the construction work contracted for by the City subject to a separate reimbursement agreement to be negotiated. The City will destroy Well No. 6 per CA Water Well Standards Bulletins 74-81 and 74-90, end electric power service to the lot, and close the valve that cuts the well off from the well water transmission main. City may remove/salvage whatever Well No. 6 superstructure they deem appropriate.

Developer will contract for and complete the demolition of the facilities and infrastructure at Well No. 6 that remain after the City destroys the well. This demolition work by Developer can start as soon as Developer acquires the Well No. 6 site property from the City. City does not require new Well No. 8 to be complete prior to the destruction of Well No. 6.

## Section 5 Street Improvements

Substantial street infrastructure already exists which will serve the Project. The existing and proposed street systems for the Project are shown in [Exhibit 10](#) (Circulation Plan, Traffic Signal and Bus Stop Plan) and in [Exhibit 11](#) (Street Vacation, Widening and Dedication Plan). Basic geometrics in the right of way such as numbers of lanes, their uses, and their widths are further shown in Street Section [Exhibits 12a, 12b, and 12c](#). The following Infrastructure descriptions apply generally to streets surrounding the Project. In general, new street structural sections consist of 6" asphalt concrete (AC) over 9" crushed aggregate base (AB) for a traffic index (TI) of 7-8 and 5" AC over 8" AB for a TI 6-7 per soils report recommendations, to meet and match existing streets. Crushed miscellaneous base (CAB) could be substituted if approved by the Soils Engineer of Record. All street structural sections shall meet City standards in effect from at the time of plan approval. All anticipated underground utility crossings will be installed prior to final street pavement. Street improvements will be designed to meet the current City of Inglewood standard plans and details. Existing fiber optic conduits will be avoided or relocated as necessary. Street trees and landscape improvements in the public right of way will be provided in accordance with the SEC Design Guidelines.

### 5.1 Local Public Street Right-Of-Way Surface Improvements

Public street surface improvements are not required except as specifically set forth in this Infrastructure Plan. Prior to the start of the Project, Developer will photograph the existing condition of the streets surrounding the Project site including West 102<sup>nd</sup> Street, West 101<sup>st</sup> Street, West Century Boulevard, South Prairie Avenue, and South Doty Avenue and will only be required to repair street improvements shown to be damaged by the development of the Project and Infrastructure. New street surface improvements to support the Project will consist of:

- (A) North side of 102<sup>nd</sup> Street west of South Prairie Avenue: Demolition and replacement of existing curbs, gutters, and sidewalks from Prairie Avenue to the western Project Boundary that is approximately 528 feet west of the intersections of the centerlines of West 102<sup>nd</sup> Street and South Prairie Avenue. Work includes adding a new concrete curb returns and asphalt surface improvements to join the new 28-foot-wide fire access road on the west side of the West Parking Garage to West 102<sup>nd</sup> Street. Slurry seal both sides of West 102<sup>nd</sup> Street from the western Project Boundary to the intersection of West 102<sup>nd</sup> Street and South Prairie Avenue. Install new parkway street trees and landscaping along the frontage of the project per Section A1 102<sup>nd</sup> Street West Parking Garage on [Exhibit 12b](#) (Street Sections).
- (B) West 101<sup>st</sup> Street 15 feet west of West Parking Garage Site western boundary: Demolition of existing curbs, gutters, and sidewalks and adding a new concrete curb returns and asphalt surface improvements to join the new 28-foot-wide fire access road on the west side of the West Parking Garage to West 101<sup>st</sup> Street.
- (C) West 101<sup>st</sup> Street from the intersection of the centerlines of West 101<sup>st</sup> Street and South Prairie Avenue west approximately 200 feet: On the south side of West 101<sup>st</sup> Street, demolish and replace existing curbs, gutters, and sidewalks and adding a new concrete curb returns and asphalt surface improvements to join the new 28-foot-wide fire access road on the east side of the West Parking Garage. Grind and overlay the north and



south sides of the remaining portion of West 101<sup>st</sup> Street in this area with asphalt. Restripe the stop sign and bar at the intersection with South Prairie Avenue.

- (D) South side of West Century Boulevard west of South Prairie Avenue: (1) Approximately 519 feet west of the intersection of the centerlines of West Century Boulevard and South Prairie Avenue, demolish 34 feet of existing curbs, gutters, and sidewalks and add a new concrete curb returns and asphalt surface improvements to join the new 28-foot-wide fire access road on the east and west sides of the West Parking Garage. Demolition of existing curbs, gutters, and sidewalks and installation of a new concrete driveway to access the West Parking Garage. (2) Approximately 220 feet west of the intersection of the centerlines of West Century Boulevard and South Prairie Avenue, demolish 34 feet of existing curbs, gutters, and sidewalk and add new concrete curb returns and asphalt surface improvements to join the new 28-foot-wide fire access road on the east side of the West Parking Garage. (3) Approximately 452 feet west of the intersection of the centerlines of West Century Boulevard and South Prairie Avenue, demolish 48 feet of existing curbs, gutters, and sidewalk and add a new concrete driveway to join the northwest entry and exit to the Western Parking Structure. Install a new traffic signal at the northwest access to the West Parking Garage including new electrical service from Southern California Edison. Install new signage and striping of West Century Boulevard at this new intersection where needed for new access points per final approved plans. Temporary relocation of existing a Metro bus stop sign, bench and trash can.
- (E) West side of South Prairie Avenue south of West 101<sup>st</sup> Street to the north side of West 102<sup>nd</sup> Street: Demolition of existing curbs, gutters, sidewalks and three streetlights. Add one new 12' wide AC right turn only lane and construction new concrete curbs, gutters and sidewalks as shown in Section P2 in [Exhibit 12b](#) (Street Sections). Install new signage and striping of the new lane per final approved plans. Tie into existing streetlight wiring conduits and reinstall the three streetlights with new foundations. Provide a concrete driveway access to the east side of the West Parking Garage. Install a new traffic signal at the West Parking Garage access including new electrical service from Southern California Edison. Install new signage on and striping of South Prairie Avenue at this new intersection per final approved plans. Replace existing City street trees in kind.
- (F) Northwest corner of South Prairie Avenue at West 102<sup>nd</sup> Street: Close off access west bound on West 102<sup>nd</sup> Street from south bound South Prairie Avenue as shown on the detail entitled Prairie Avenue and West 102<sup>nd</sup> Street West Parking Structure on [Exhibit 12c](#) (Street Sections). Demolish the existing traffic signal at this intersection. Install signage and striping of this intersection per final approved plans.
- (G) South Prairie Avenue between West 102<sup>nd</sup> Street and West 103<sup>rd</sup> Street: If the location of the reversible lane signal that crosses South Prairie Avenue overhead is in conflict with an access driveway to the Project, remove and, if feasible, relocate (or if damaged by Developer in the course of removal, replace), the existing reversible lane gantry to a nearby location within the existing City reversible lane system. Work would include new concrete foundations and tying into the existing reversible lane wiring system.

- (H) East side of South Prairie Avenue along the frontage of the Project south of West 102<sup>nd</sup> Street to the Project Boundary: Demolish existing and install new curbs, gutters, and sidewalks. Install new concrete curb returns and asphalt surface improvements to join the new 12-foot-wide access road to the South Parking Garage that will be approximately 167 feet south of the intersection of the centerlines of South Prairie Avenue and West 102<sup>nd</sup> Street. Install new concrete curb returns and asphalt surface improvements to join the new 28-foot-wide access road to the South Parking Garage that will be approximately 227 feet south of the intersection of the centerlines of South Prairie Avenue and West 102<sup>nd</sup> Street. Relocate one streetlight. Tie into existing streetlight wiring conduits and reinstall the existing streetlight with new foundations.
- (I) East side of South Prairie Avenue between West 102<sup>nd</sup> Street and West Century Boulevard: Demolition of existing curbs, gutters, sidewalks and three streetlights. Add one new 12' wide AC right turn only lane and construction new concrete curbs, gutters and sidewalks as shown in Section P2 in Exhibit 12b (Street Sections). Extend the south leg crosswalk striping across South Prairie Avenue to the new southeast corner. Tie into existing streetlight wiring conduits and reinstall three streetlights with new foundations. Modify the existing traffic signal at West Century Boulevard and South Prairie Avenue to implement a northbound right-turn signal overlap phase. Install new signage and striping of South Prairie Avenue per final approved plans. Remove the existing bus stop signs, benches, trash can and shelter. Adjust the east leg crosswalk across West Century Boulevard to the new southeast corner and widen it to 20'. Replace existing City street trees in kind.
- (J) East side of South Prairie Avenue north of West Century Boulevard: Remove existing parkway landscape, install sidewalk and reinstall the bus stop signs, benches, trash can and shelter from the south side of West Century Boulevard to the north side of the intersection as shown on Exhibit 10 (Circulation Plan, Traffic Signal and Bus Stop Plan). Remove the existing AC in the street and install a new concrete bus pad per City of Inglewood Standard Plan DS-14.
- (K) South side of West Century Boulevard between South Prairie Avenue to South Doty Avenue: (1) Relocate the existing bus stop sign, shelter, benches, and trash can east as shown on Exhibit 10 (Circulation Plan, Traffic Signal and Bus Stop Plan). Remove the existing AC in the street and install a new concrete bus pad per City of Inglewood Standard Plan DS-14. (2) Approximately 407 feet east of the intersection of the centerlines of West Century Boulevard and South Prairie Avenue, demolish approximately 41 feet of existing curbs, gutters, and sidewalks and add a new concrete curb returns and asphalt surface improvements to join the new 28-foot-wide fire access road to the east of the Plaza and to join the access ramp to the new Arena underground event floor level. Relocate one streetlight to create room for the new fire access road to the east of the Sports and Entertainment Complex plaza.
- (L) South side of West Century Boulevard along the East Parking Garage site frontage: (1) Demolish existing curbs, gutters, and sidewalks where needed and add a new concrete curb returns and asphalt surface improvements to join the new fire access road to the west side of the East Parking Garage. (2) Demolish existing curbs, gutters, and sidewalks and add new concrete curb returns and asphalt surface treatments to join the

new East Parking Garage ingress and egress points. Modify the traffic signal, median and striping at the entrance to the East Parking Garage to allow for eastbound and westbound turning movements.

- (M) North side of West 102<sup>nd</sup> Street along the East Parking Garage site frontage: Demolish and replace existing curbs, gutters, and sidewalks and add a new concrete curb return and asphalt surface improvements to join the new access road to the south side of the East Parking Garage. Install new parkway landscape and street trees along the frontage of the lot.
- (N) North side of West 102<sup>nd</sup> Street approximately 213 feet west of the intersection of South Doty Avenue and West 102<sup>nd</sup> Street: Install a LA County Fire Department approved hammer-head turn around. This will require removing curb, gutter and sidewalk and installing new curb returns, sidewalk and asphalt surface improvements.
- (O) Install a conduit and fiber optic cable to provide a direct connection from the City ITS hub at the northwest corner of the intersection of West Century Boulevard and South Prairie Avenue to the main distribution frame within the Sports and Entertainment Complex site for use by the City of Inglewood Public Works Department and the City of Inglewood Police Department.
- (P) The hotel to be constructed on West Century Boulevard east of the East Parking Garage site will require demolition of the existing curbs, gutters, and sidewalks where needed, and the addition of a new driveway to the hotel on West Century Boulevard. These improvements will be installed by the hotel developer under separate plans, traffic control plans and permits to be obtained provided by the hotel Developer, and it is not part of this SEC Infrastructure Plan.

## 5.2 Mitigation Measures Including Intersections, Traffic Signal Improvements and Freeway Improvements in the City of Inglewood and in Other Jurisdictions

The following specific intersection, traffic signal and freeway Infrastructure improvements shall, subject to obtaining consents of other regulatory agencies with jurisdiction, where applicable, such as the City of Los Angeles, City of Hawthorne or Caltrans, be provided by Developer in accordance with the Section 3.14 Transportation and Circulation Mitigation Measures as described of the IBEC MMRP, including the schedule and conditions for performance described in the MMRP. In the event of a conflict or omission between the description of the Infrastructure improvements described in this Section 5.2 and the IBEC MMRP the IBEC MMRP shall control.

- (A) As shown on [Exhibit 13a](#), work with the City of Inglewood and the City of Los Angeles to implement capacity-increasing improvements at the West Century Boulevard/South La Cienega Boulevard intersection. Recommended improvements include two elements: (i) Restripe the westbound approach and modify traffic signals to convert the outside through/right lane to a dedicated right-turn lane and operate it with an overlap phase consistent with the LAX Landside Modernization Program [LAMP] improvements planned for this location; and (ii) Remove median island on the west leg, restripe the

eastbound and westbound approaches, and modify traffic signals to add second left-turn lanes in each direction. . If infeasible work with the City of Inglewood and LADOT to identify a substitute measure or contribution in accordance with the IBEC MMRP for MM 3.14-2(c).

- (B) As shown on Exhibit 13b, construct (via restriping, and conversion of median) second left-turn lanes on the northbound and southbound approaches to the Century Boulevard/Hawthorne Boulevard/La Brea Boulevard intersection and operate the northbound right-turn with an overlap phase. [MM3.14-2(d)]
- (C) As shown on Exhibit 13c, restripe the westbound West 104<sup>th</sup> Street approach to Yukon Avenue from its current configuration consisting of a shared left/through/right lane to a revised configuration consisting of a left/through lane and a dedicated right-turn lane. [MM 3.14-2(f)]
- (D) As shown on Exhibit 13d, work with the City of Inglewood and Caltrans to widen the I-105 off-ramp approach to Prairie Avenue to consist of two lefts, a shared left/through/right, and a dedicated right-turn lane. This will require obtaining Caltrans approval and 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. [MM 3.14-2(g)]
- (E) As shown on Exhibit 13e, 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. [MM3.14-2(h)]
- (F) As shown on Exhibit 13f, 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. [MM3.14-2(i)]
- (G) As shown on Exhibit 13g, 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. Replace sign gantry. Modify Caltrans maintained traffic signals. This would require obtaining Caltrans approval and 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. [MM3.14-2(j)]
- (H) As shown on Exhibit 13h, work with the City of Hawthorne to remove the median island and restripe the southbound approach of 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. Work includes modification of traffic signals as necessary. [MM 3.14-2(k)]

- (I) As shown on Exhibit 13j, work with the City of Hawthorne to implement a southbound right-turn overlap signal phase at the intersection of Crenshaw Boulevard and 120<sup>th</sup> Street. [MM 3.14-2(l)]
- (J) As shown on Exhibit 13j, 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. MM 3.14-2(n)]
- (K) As shown on Exhibit 13k, work with the City of Inglewood and Caltrans to restripe the center lane on the I-405 Northbound Off-Ramp at West Century Boulevard to permit both left and right-turn movements. This would require obtaining Caltrans approval and 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, project study report, project report, environmental and engineering studies, project design, construction, etc. [MM 3.14-3(c)]
- (L) As shown on Exhibit 13l, 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. If infeasible work to identify a substitute measure in accordance with MM 3.14-3(j), as described in the IBEC MMRP.
- (M) As shown on Exhibit 13m, implement protected or protected/permissive left-turn phasing on northbound and southbound South Prairie Avenue at West 104<sup>th</sup> Street. [MM 3.14-3(l)]
- (N) Work with the City of Inglewood, the City of Hawthorne and Caltrans to investigate the feasibility of adding a second eastbound left turn lane on 120th Street at the I-105 Eastbound On and Off Ramps within the existing pavement width, and if determined feasible within the existing pavement width, to implement the improvement. [MM 3.14-2(p)]
- (O) Work with the City of Inglewood and the Centinela Hospital Medical Center to develop and implement a local Hospital Access Plan, as described in MM 3.14-14 in the IBEC MMRP. This could include a wayfinding program that includes 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, or other elements. [MM 3.14-14]
- (P) As shown on Exhibit 13n, 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. [MM 3.14-17(q)]
- (Q) Retain traffic engineer to work with the City to create traffic signal timing sheets to coordinate City traffic signals and optimize City traffic signal timings to accommodate major event traffic flows. See Fig. 3.14-17 in IBEC EIR for locations. [MM 3.14-3(o)]

- (R) 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. [MM 3.14-3(e)].
- (S) Widen the east side of South Prairie Avenue to extend the proposed shuttle bus pull-out on the east of South Prairie Avenue to the intersection to serve as an exclusive right turn lane. Additionally, implement a northbound right-turn signal overlap phase. [MM 3.14-3(f)] [See Section 5.1(l) above]
- (T) Widen the east leg crosswalk across West Century Boulevard at South Prairie Avenue to 20 feet. [MM 3.14-13 [See Section 5.1(l) above]

## SEC Infrastructure Plan Exhibits

Exhibit 1	Sewer Infrastructure Plan
Exhibit 2	Storm Drain Infrastructure Plan
Exhibit 3	Fire Protection Infrastructure Plan
Exhibit 4	Domestic Water Infrastructure Plan
Exhibit 5	Well Water Transmission Infrastructure Plan
Exhibit 6	Reclaimed Water Infrastructure Plan
Exhibit 7	Dry Utility Infrastructure Plan
Exhibit 8	New Inglewood Well No. 8 Plan
Exhibit 9	Inglewood Well No. 6 Demolition Plan
Exhibit 10	Circulation Plan, Traffic Signal and Bus Stop Plan
Exhibit 11	Street Vacations, Widening and Dedications Plan
Exhibit 12a	Street Sections
Exhibit 12b	Street Sections
Exhibit 12c	Street Sections
Exhibit 13a	La Cienega Blvd / W Century Blvd
Exhibit 13b	Hawthorne Blvd / La Brea Ave / W Century Blvd
Exhibit 13c	Yukon Ave / 104th St
Exhibit 13d	S Prairie Ave / I-105 Off Ramp
Exhibit 13e	Manchester Blvd / La Brea Ave
Exhibit 13f	Crenshaw Blvd / Manchester Blvd
Exhibit 13g	Crenshaw Blvd / I-105 Off Ramp
Exhibit 13h	S Prairie Ave / 120th St
Exhibit 13i	Crenshaw Blvd / 120 <sup>th</sup> St
Exhibit 13j	La Brea Ave / S Centinela Ave
Exhibit 13k	I-405 Northbound Off-Ramp / W Century Blvd
Exhibit 13l	La Cienega Blvd / S Centinela Ave
Exhibit 13m	104 <sup>th</sup> St / S Prairie Ave
Exhibit 13n	W Century Blvd / Felton Ave

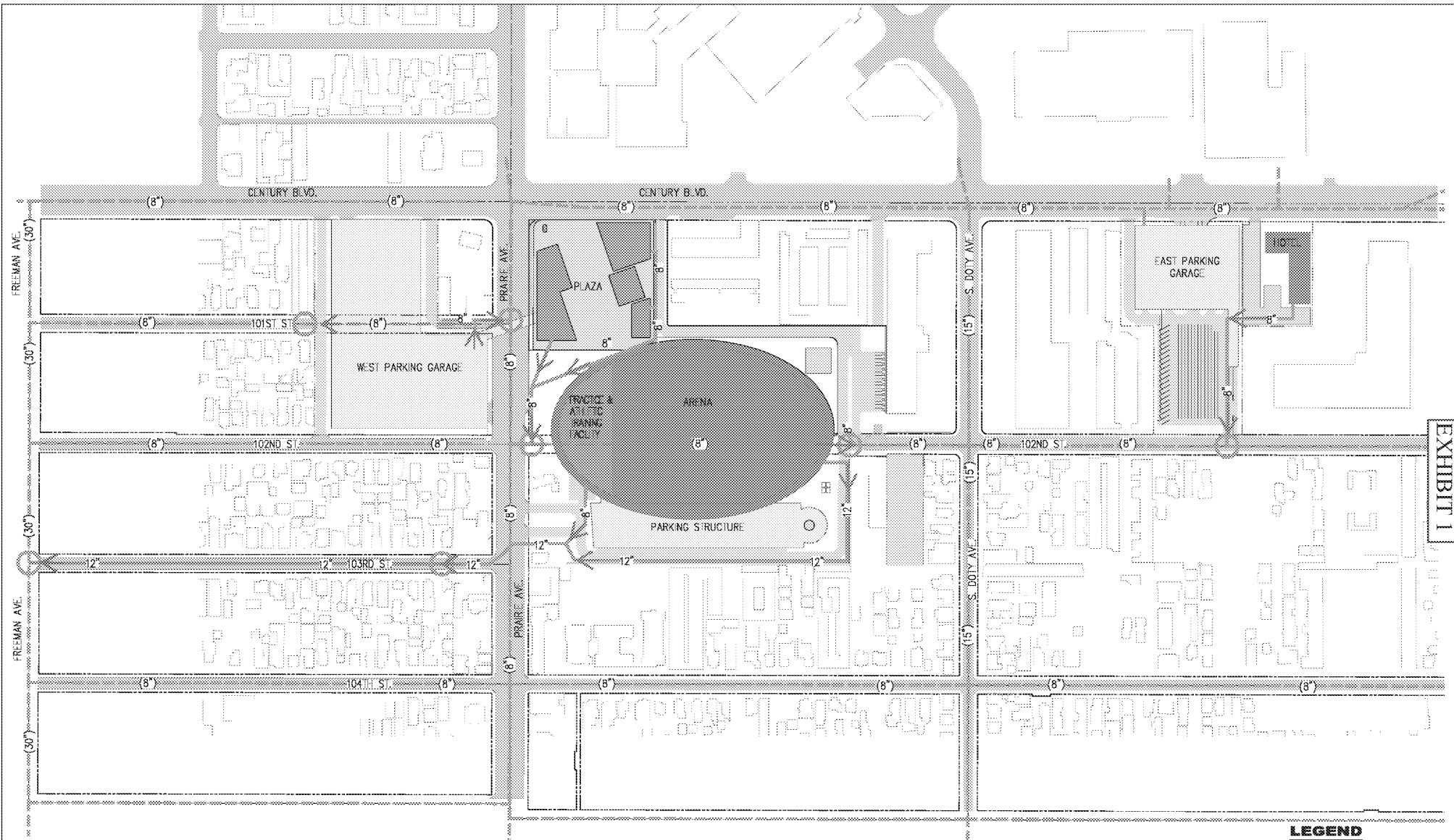
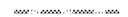





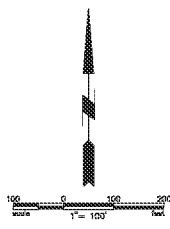


EXHIBIT 1

**LEGEND**

-  REMOVE EXISTING SEWER LINE
-  EXISTING SEWER LINE
-  PROPOSED SEWER LINE
-  CONNECT TO EXISTING LINE
-  EXISTING SEWER LINE TO UPSIZED EXISTING LINE SIZE
-  PROPOSED LINE SIZE



**D & D ENGINEERING, INC.**  
 8801 S. LA CENIZUELA BLVD, SUITE 108  
 PUEBLOVILLO, CA 95021  
 Phone: 424-351-8800

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER

CONCEPTUAL SEWER INFRASTRUCTURE

1" = 100'  
 11/16/2019  
 1 of 1



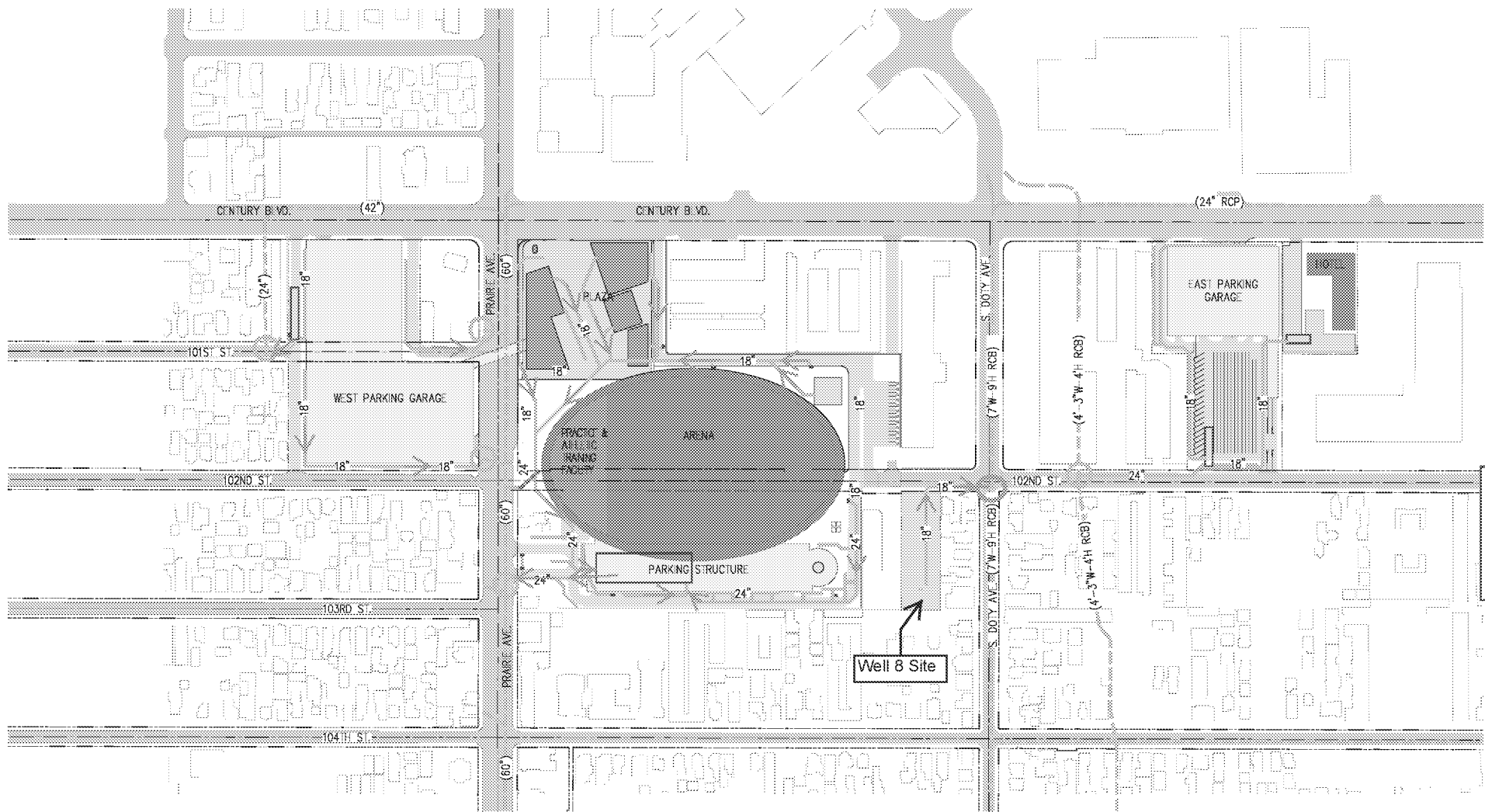
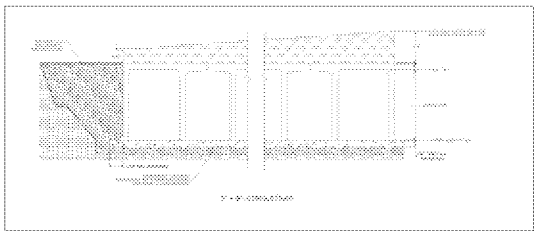


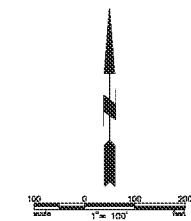
EXHIBIT 2

**LEGEND**

- EXISTING STORM DRAIN LINE
- REMOVE EXISTING STORM DRAIN LINE
- PROPOSED STORM DRAIN LINE
- PROPOSED STORM DRAIN STRUCTURE
- CONNECT TO EXISTING LINE
- PROPOSED UNDERGROUND PRECAST DETENTION STRUCTURE
- EXISTING LINE SIZE
- PROPOSED LINE SIZE



STORMTRAP UNDERGROUND PRECAST DETENTION STRUCTURE TYPICAL DETAIL



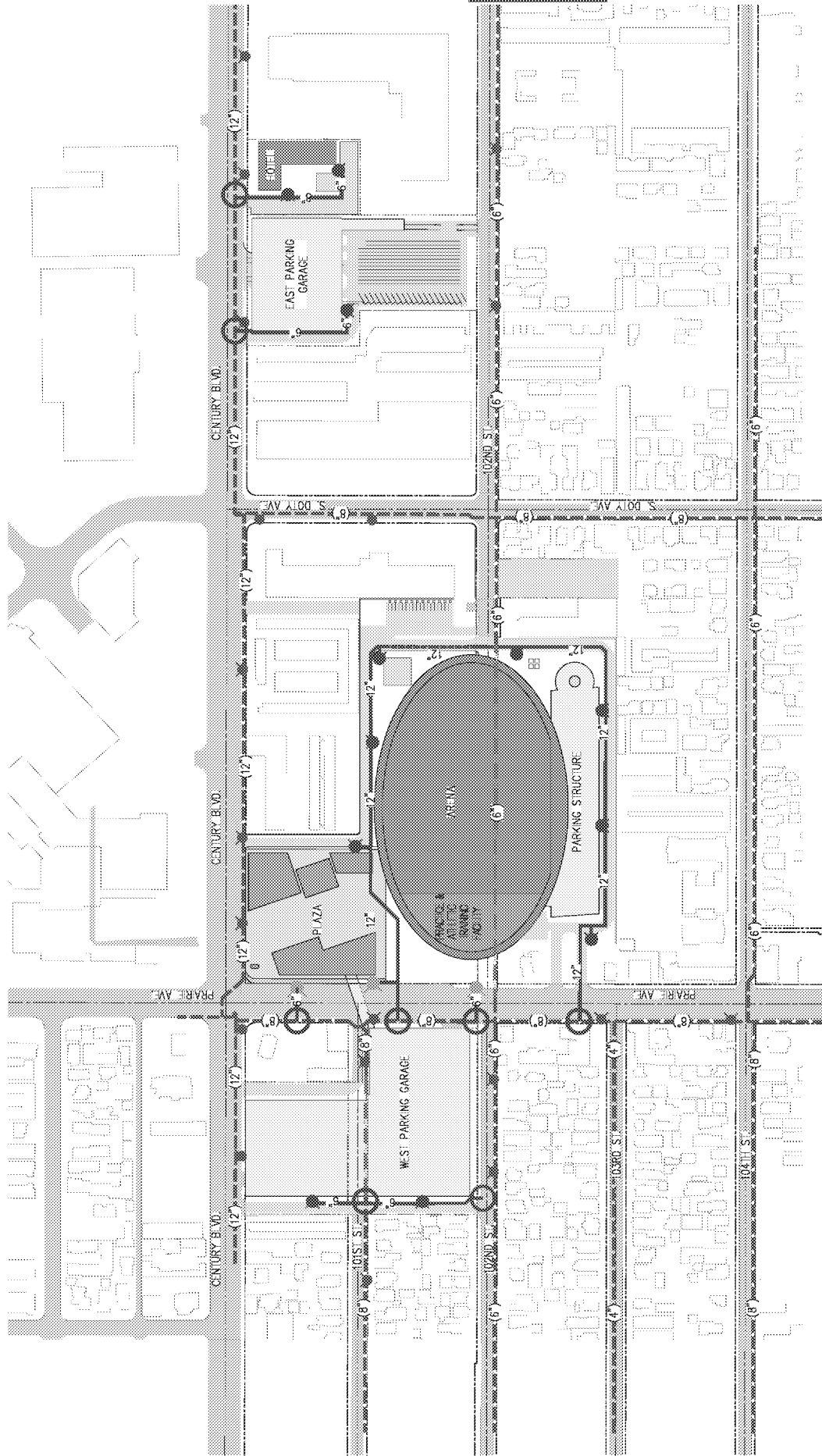
**D & D ENGINEERING, INC.**  
 8801 S. LA CERRITOS BLVD, SUITE 108  
 FORT WORTH, TX 76101  
 Phone: 424-351-8800

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER

CONCEPTUAL STORM DRAIN EXHIBIT

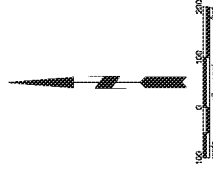
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 11/16/2019  
 01 of 01


# EXHIBIT 3



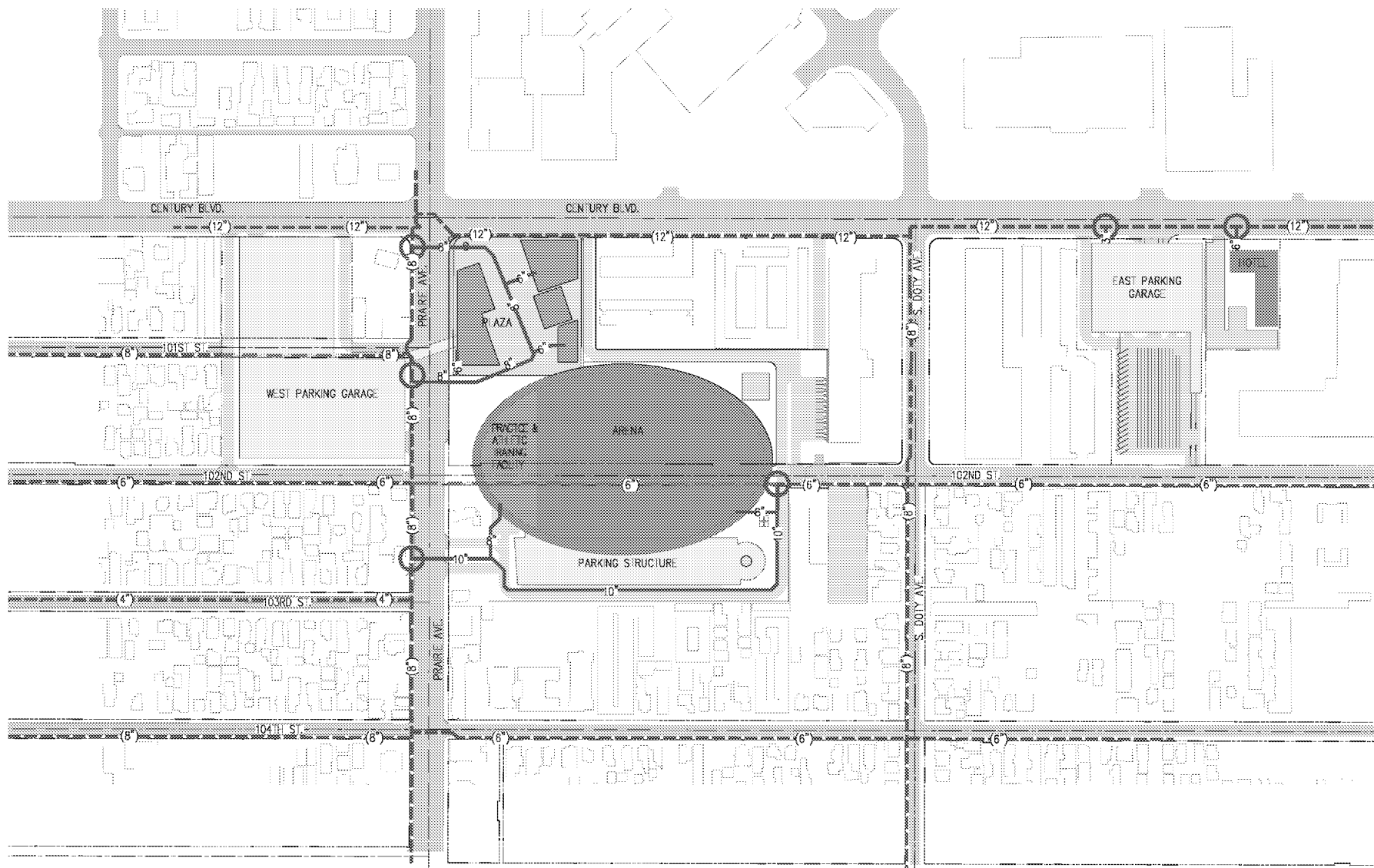
## LEGEND

- EXISTING CSWC WATER LINE
- PROPOSED FIRE WATER LINE
- PROPOSED FIRE WATER LINE PER BUILDING PLUMBING PLANS
- REMOVE CSWC WATER LINE
- EXISTING FIRE HYDRANT
- PROPOSED PUBLIC FIRE HYDRANT
- PROPOSED PRIVATE FIRE HYDRANT
- CONNECT TO EXISTING WATER LINE
- EXISTING LINE SIZE (XX")



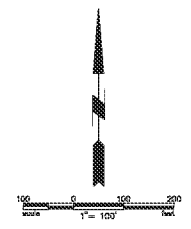
  
**D & D ENGINEERING, INC.**  
 8815 S. GARDNER STREET, SUITE 108  
 HALLANDALE BEACH, FL 33024  
 Phone: 407-941-8802

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER  
 CONCEPTUAL FIRE PROTECTION INFRASTRUCTURE  
 1 of 1



**LEGEND**

- EXISTING GSWC POTABLE WATER LINE
- PROPOSED GSWC POTABLE WATER LINE
- REMOVE GSWC POTABLE WATER LINE
- CONNECT TO EXISTING LINE
- (XX") EXISTING LINE SIZE
- XX" PROPOSED LINE SIZE



**D & D ENGINEERING, INC.**  
 8801 S. LA CERRITOS BLVD, SUITE 108  
 PUEBLO, CO 81001  
 Phone: 424-351-8800

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER	
CONCEPTUAL POTABLE WATER INFRASTRUCTURE	11/16/2019
	1 of 1

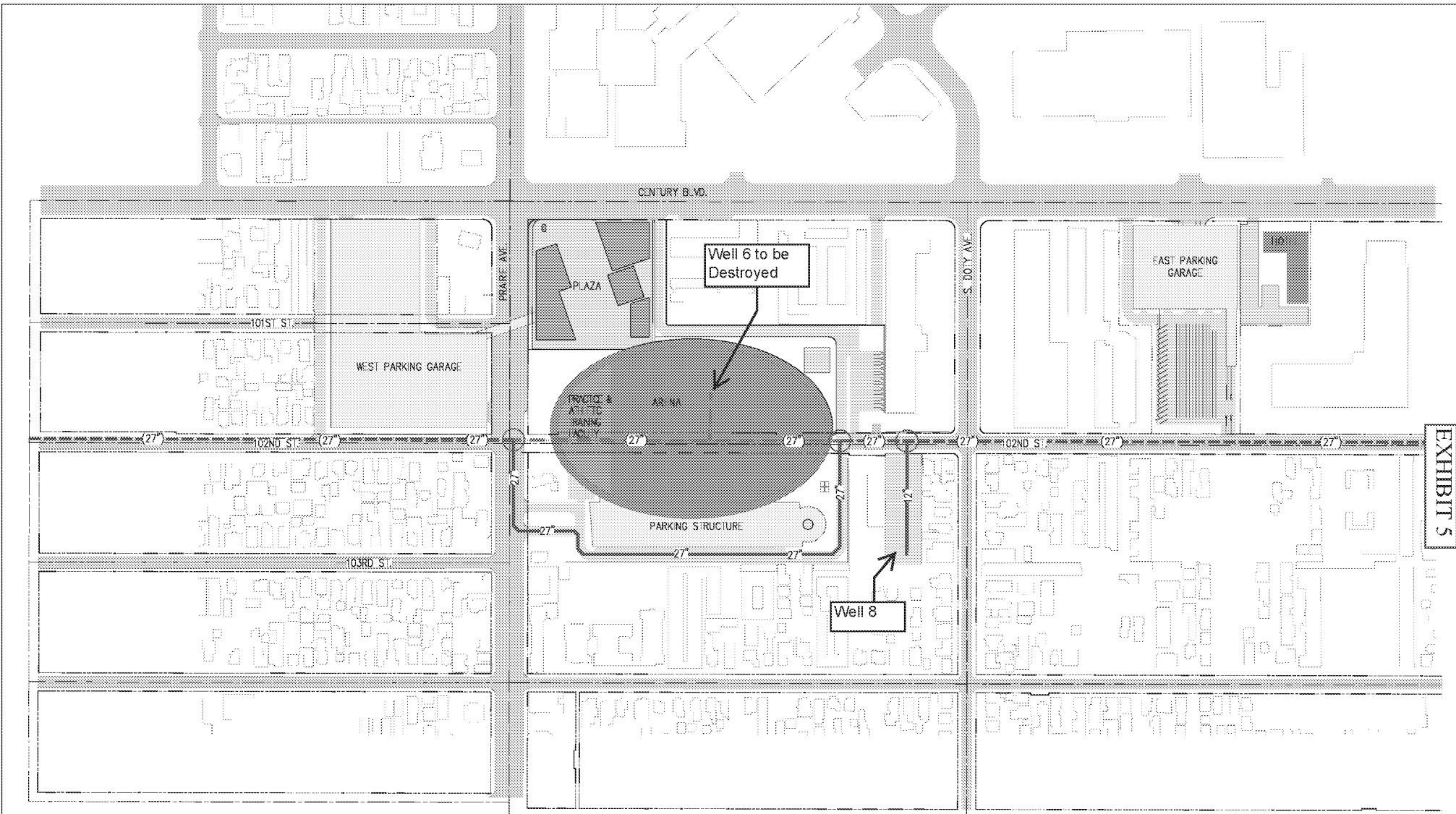
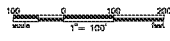
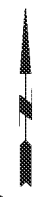


EXHIBIT 5

**LEGEND**

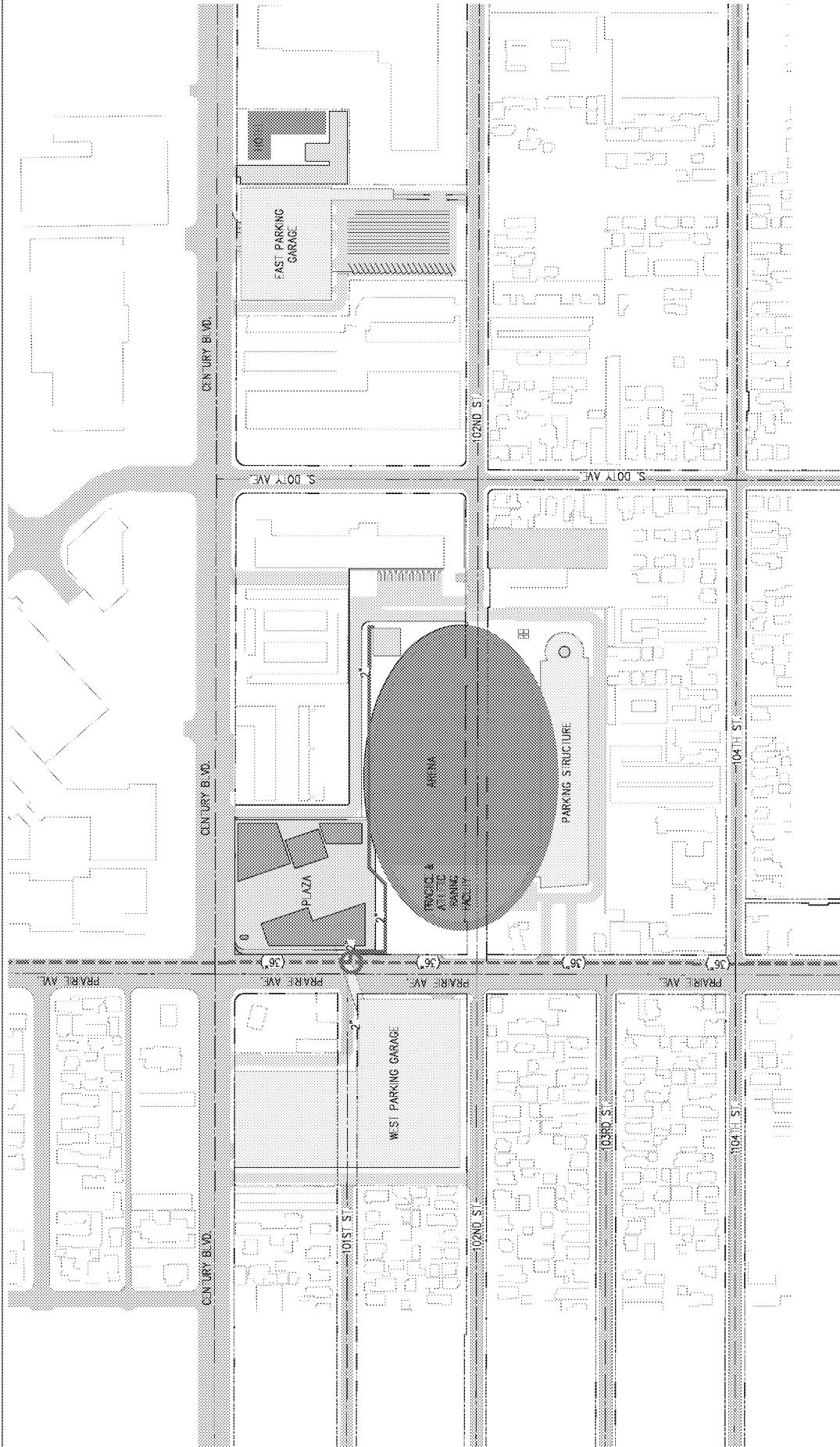
- EXISTING CITY OF INGLEWOOD TRANSMISSION POTABLE WATER LINE
- PROPOSED CITY OF INGLEWOOD TRANSMISSION POTABLE WATER LINE
- REMOVE EXISTING CITY OF INGLEWOOD TRANSMISSION POTABLE WATER LINE
- CONNECT TO EXISTING LINE
- (XX") EXISTING LINE SIZE
- XX" PROPOSED LINE SIZE



**D & D ENGINEERING, INC.**  
 8801 S. LA CERRENA BLVD, SUITE 108  
 PUEBLO, CO 81001  
 Phone: 424-351-8800

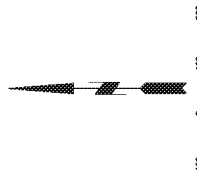
INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER	
CONCEPTUAL WELL TRANSMISSION EXHIBIT	1" = 100' 11/16/2019 1 of 1

**EXHIBIT 6**



**LEGEND**

- EXISTING RECLAIMED WATER LINE
- PROPOSED RECLAIMED WATER LINE
- CONNECT TO EXISTING LINE
- (XX") EXISTING LINE SIZE
- XX" PROPOSED LINE SIZE

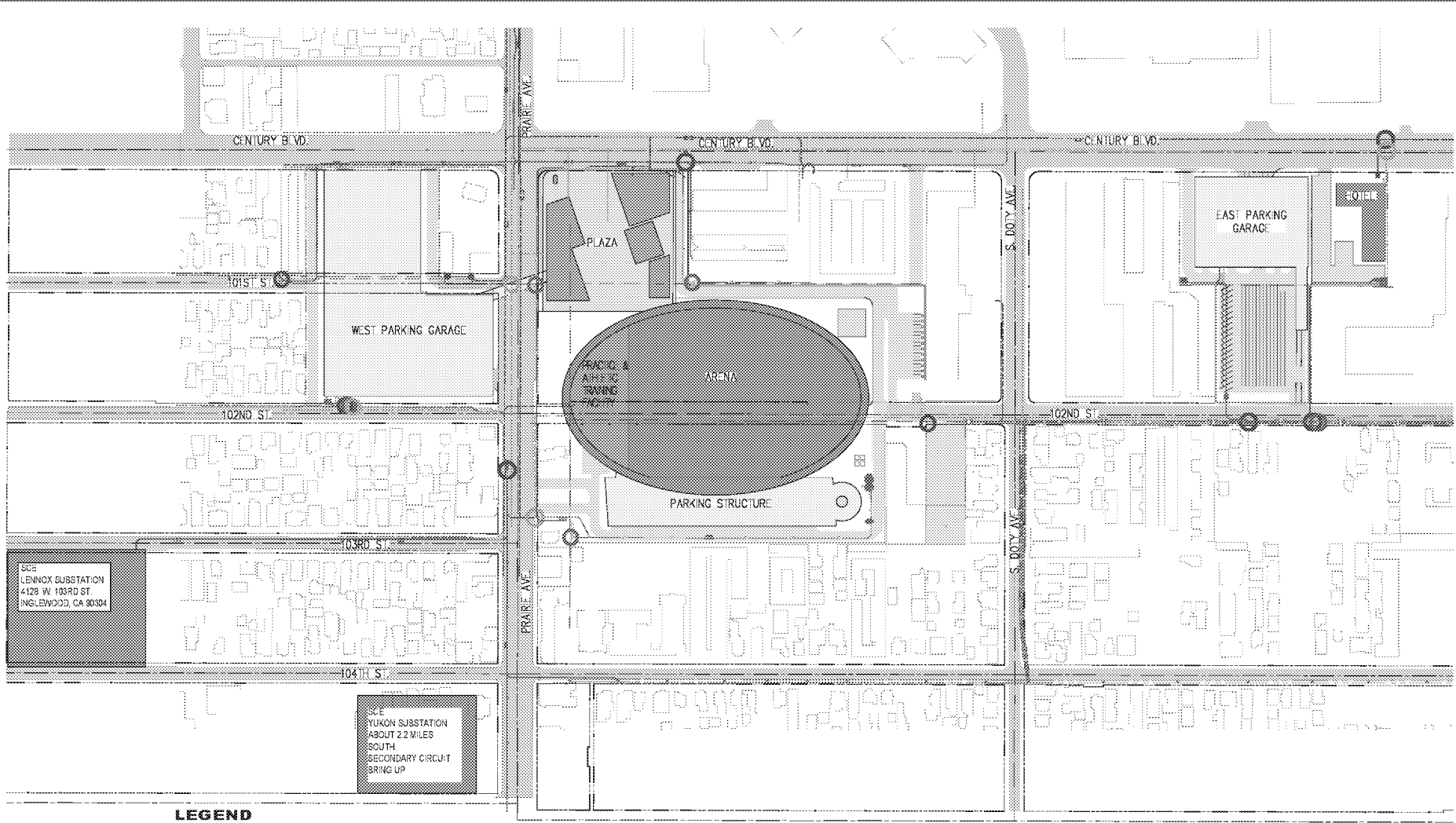


**D & D ENGINEERING, INC.**  
 8815 S. HOLLAND ST. SUITE 118  
 HOLLAND, OH 43030  
 Phone: 614-961-8802

**INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER**

CONCEPTUAL RECLAIMED WATER INFRASTRUCTURE

1" = 100'  
 1/16" = 200'  
 1 OF 1

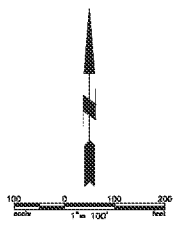


ECE  
LENNOX SUBSTATION  
4128 W 103RD ST.  
INGLEWOOD, CA 90304

ECE  
YUKON SUBSTATION  
ABOUT 2.2 MILES  
SOUTH  
SECONDARY CIRCUIT  
BRING UP

**LEGEND**

- EXISTING ELECTRICAL LINE
- EXISTING GAS LINE
- REMOVE EXISTING GAS LINE
- EXISTING OVERHEAD LINE
- REMOVE EXISTING OVERHEAD LINE
- PROPOSED ELECTRICAL TRENCH
- PROPOSED GAS TRENCH
- PROPOSED CATV TRENCH
- PROPOSED TELEPHONE TRENCH
- PROPOSED JOINT TRENCH (ELEC., GAS, CATV, TELE.)
- EXISTING ELECTRICAL VAULT/STRUCTURE
- PROPOSED ELECTRICAL VAULT/STRUCTURE
- CONNECT TO EXISTING ELEC. LINE
- CONNECT TO EXISTING GAS LINE
- CONNECT TO EXISTING LINE (CATV/TELEPHONE)



P:\1001\Eng\1001\West\trac\trac.dwg  
 BU PALMER & ASSOCIATES, INC.  
 One Ridgeway Drive, Suite 105  
 Torrance, CA 90505

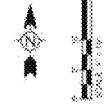
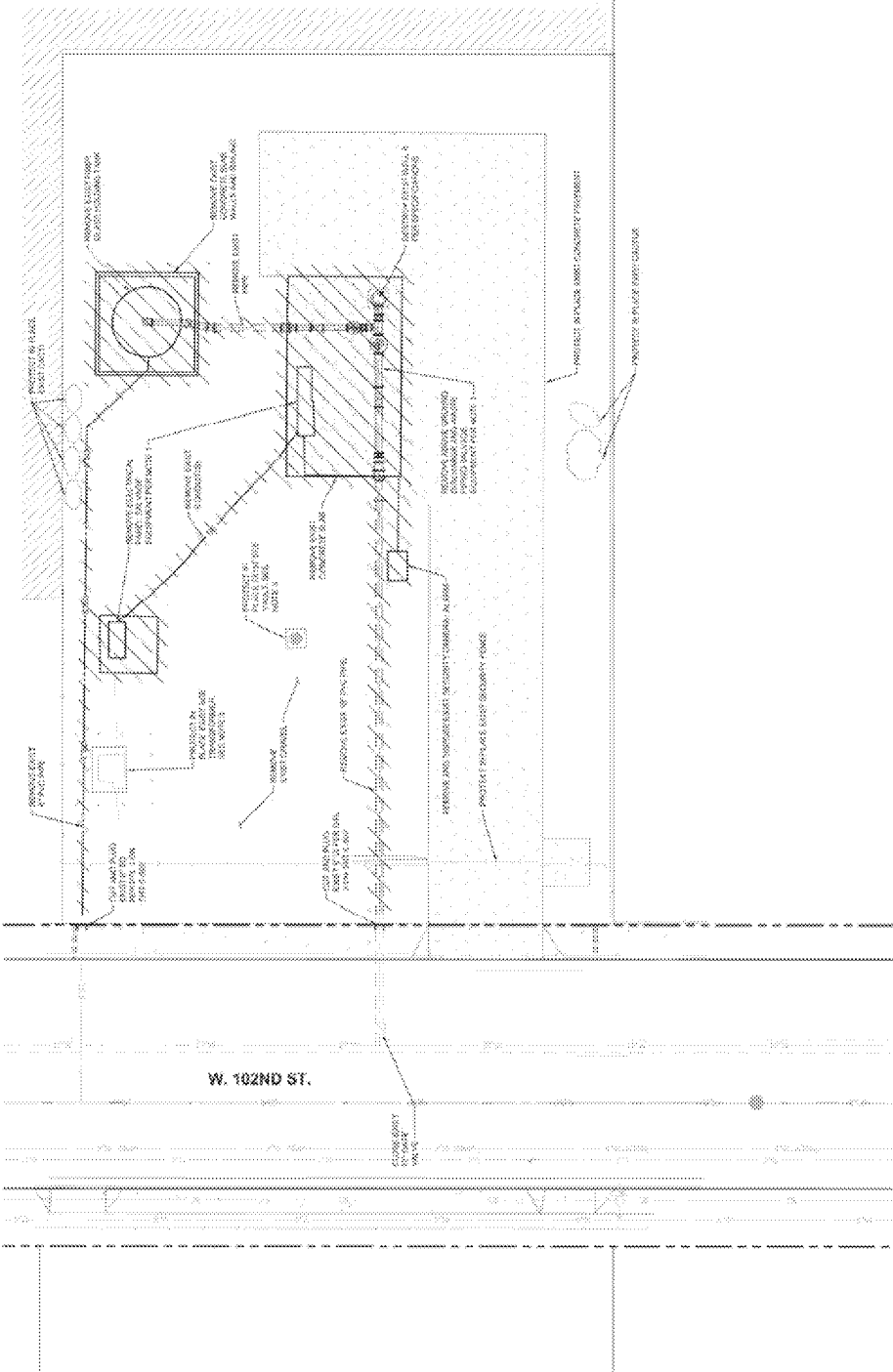
**D S D ENGINEERING, INC.**  
 8801 S. LA CENIZA BLVD, SUITE 108  
 INGLEWOOD, CA 90301  
 Phone: 424-351-8800

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER  
 CONCEPTUAL DRY UTILITIES INFRASTRUCTURE  
 05/13/2016  
 01



**NOTE**

1. DEMOLITION SHALL BE IN ACCORDANCE WITH THE CITY OF INGLEWOOD, CALIFORNIA, LOCAL ORDINANCE 12.01, AS AMENDED, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.01, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.02.
2. DEMOLITION SHALL BE IN ACCORDANCE WITH THE CITY OF INGLEWOOD, CALIFORNIA, LOCAL ORDINANCE 12.01, AS AMENDED, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.01, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.02.
3. DEMOLITION SHALL BE IN ACCORDANCE WITH THE CITY OF INGLEWOOD, CALIFORNIA, LOCAL ORDINANCE 12.01, AS AMENDED, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.01, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.02.
4. DEMOLITION SHALL BE IN ACCORDANCE WITH THE CITY OF INGLEWOOD, CALIFORNIA, LOCAL ORDINANCE 12.01, AS AMENDED, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.01, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.02.
5. DEMOLITION SHALL BE IN ACCORDANCE WITH THE CITY OF INGLEWOOD, CALIFORNIA, LOCAL ORDINANCE 12.01, AS AMENDED, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.01, AND THE CALIFORNIA CONSTRUCTION CODE, TITLE 24, PART 901, CHAPTER 1, DIVISION 10, SECTION 1001.02.



CITY OF INGLEWOOD  
 3815 W. 102ND ST. INGLEWOOD, CA  
**WELL 8**  
 DEMOLITION PLAN

DM-101

City of Ingleswood  
 3815 W. 102ND ST.  
 INGLEWOOD, CA 90304

TETRA TECH  
 1000 W. 102ND ST. SUITE 100  
 INGLEWOOD, CA 90304

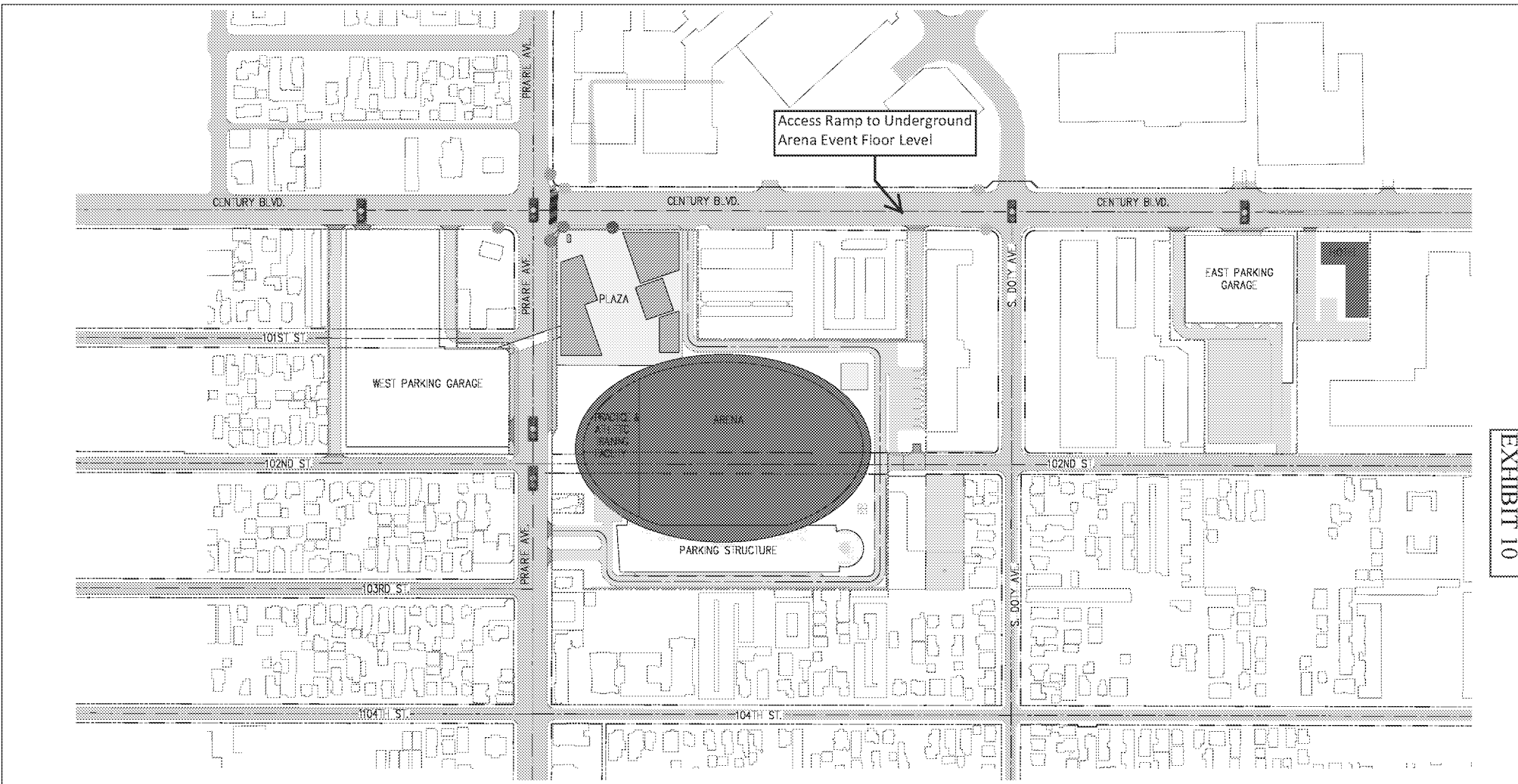
PROJECT NO. 102ND ST. W. 102ND ST. W. 102ND ST.  
 SHEET NO. 102ND ST. W. 102ND ST. W. 102ND ST.

DATE: 10/20/2023  
 DRAWN BY: [Name]  
 CHECKED BY: [Name]

**DIALERT**  
 811  
 CALL BEFORE YOU DIG

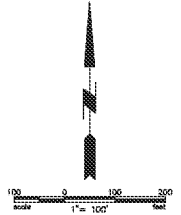
Vertical text on the right edge of the drawing, including project details and sheet information.





**LEGEND**

- |  |  |  |  |
|--|--|--|--|
|  | EXISTING BUS STOP                        |  | NEW TRAFFIC SIGNAL                     |
|  | EXISTING BUS STOP TO BE RELOCATED        |  | EXISTING TRAFFIC SIGNAL TO BE REMOVED  |
|  | PERMANENT RELOCATED BUS STOP             |  | EXISTING TRAFFIC SIGNAL TO REMAIN      |
|  | TEMPORARY RELOCATED BUS STOP             |  | EXISTING TRAFFIC SIGNAL TO BE MODIFIED |
|  | TEMPORARY & PERMANENT RELOCATED BUS STOP |  | EXISTING PROPERTY LINE                 |
|  | PROPOSED DRIVEWAY                        |  | PROPOSED PROPERTY LINE                 |
|  | PROPOSED STREET WIDENING                 |  |  |
|  | PROPOSED STREET DEDICATION               |  |  |
|  | PROPOSED 20' WIDE CROSSWALK              |  |  |



<p><b>D &amp; D ENGINEERING, INC.</b>          8801 S. LA CERRITOS BLVD, SUITE 108          PUEBLO, CO 81001          Phone: 424-351-8800</p>	<p>INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER</p>
	<p>CONCEPTUAL CIRCULATION PLAN          TRAFFIC SIGNAL AND BUS STOP</p>
<p>DATE: 08/28/18          DRAWN BY: [Name]          CHECKED BY: [Name]</p>	<p>SCALE: 1" = 100'          1 of 1</p>

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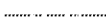
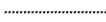

PRAIRIE AVENUE PEDESTRIAN BRIDGE  
AIRSPACE VACATION. APPROXIMATELY  
28' WIDE X 106' LONG  
3,160 SQ. FT.

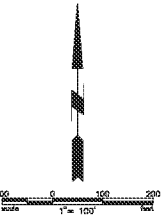
CENTURY BLVD PEDESTRIAN BRIDGE  
AIRSPACE VACATION. APPROXIMATELY  
24' WIDE X 100' LONG  
2,400 SQ. FT.

101ST STREET VACATION  
16,841 SQ. FT.

102ND STREET VACATION  
48,955 SQ. FT.

**LEGEND**

-  PROPOSED STREET WIDENING
-  PROPOSED DEDICATION
-  PROPOSED VACATION
-  PROPOSED LACPD EASEMENT
-  BUILDING SETBACK- REFER TO BUILDING SETBACK EXHIBIT
-  EXISTING PROPERTY LINE
-  NEW PROPERTY LINE
-  STREET SECTION



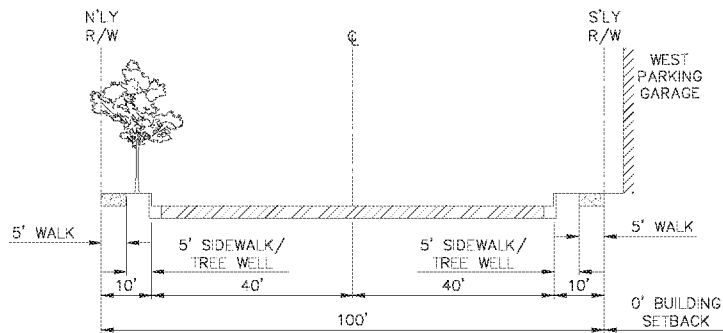
**D & D ENGINEERING, INC.**  
8801 S. LA CERRITOS BLVD, SUITE 108  
PULMONO, CA 95021  
Phone: 424-351-8802

INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER

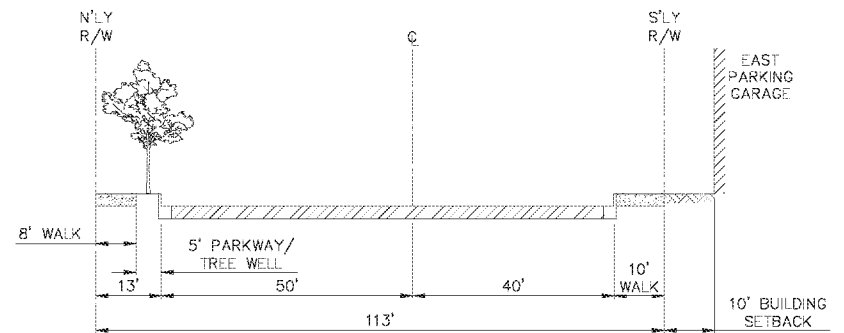
CONCEPTUAL STREET VACATION, WIDENING AND DEDICATION PLAN

1" = 100'  
11/18/18  
1 of 4

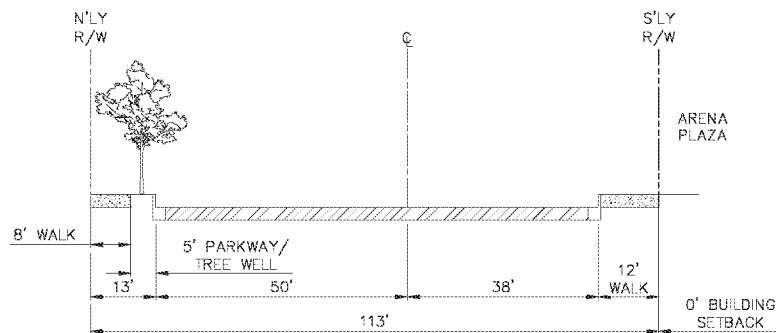
EXHIBIT 11



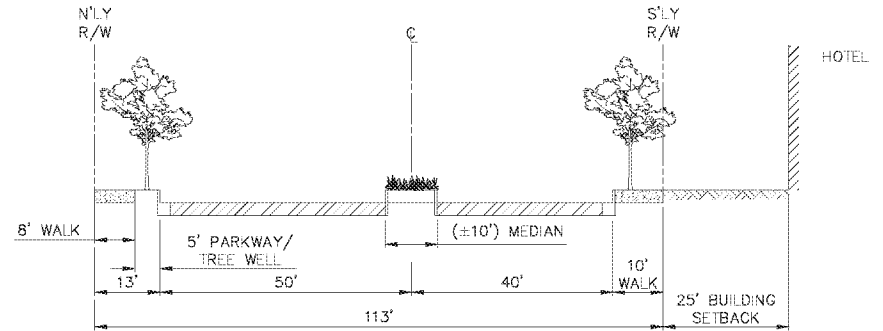
SECTION C1  
CENTURY BOULEVARD  
NOT TO SCALE



SECTION C3  
CENTURY BOULEVARD  
NOT TO SCALE



SECTION C2  
CENTURY BOULEVARD  
NOT TO SCALE



SECTION C4  
CENTURY BOULEVARD  
NOT TO SCALE

EXHIBIT 12a

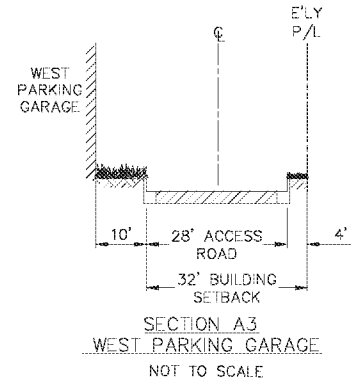
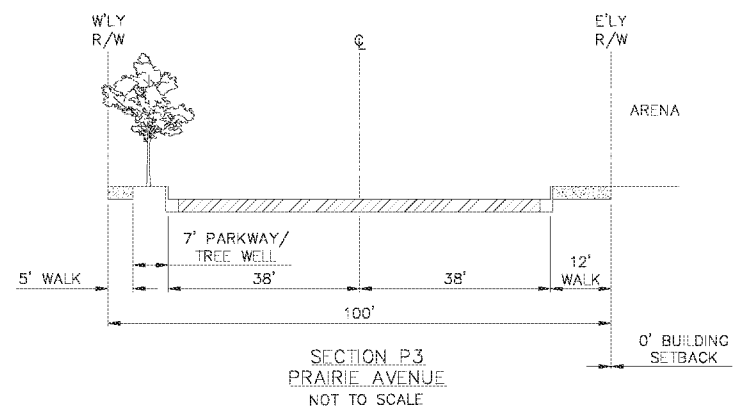
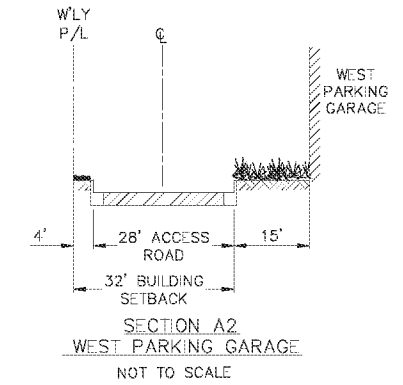
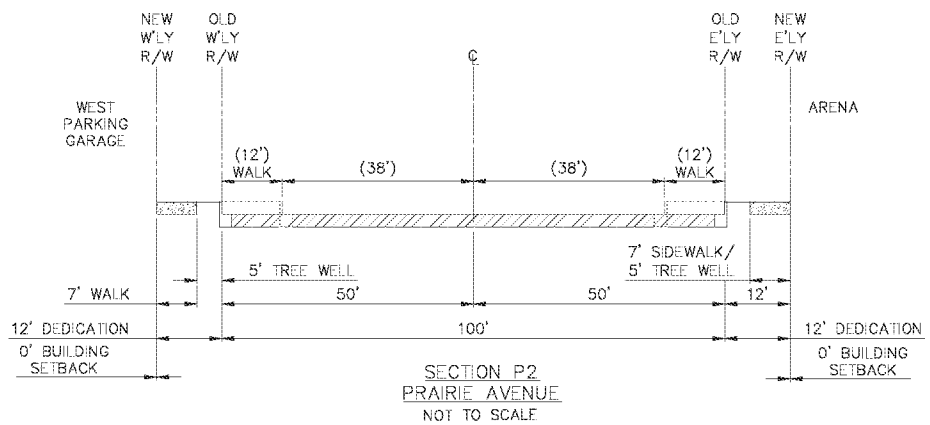
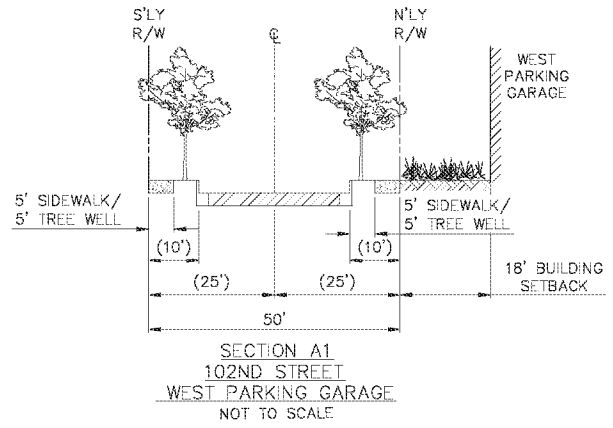
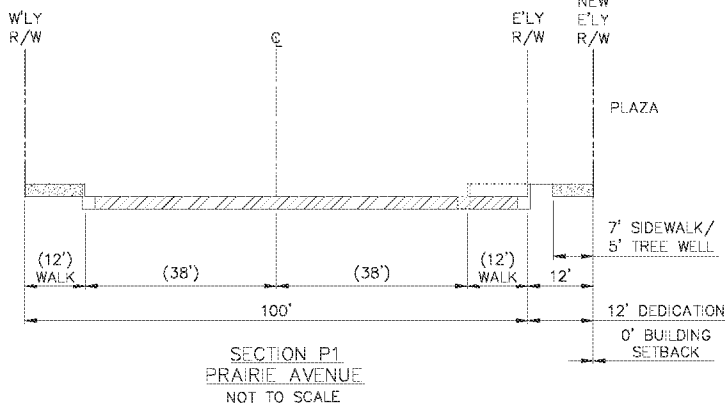
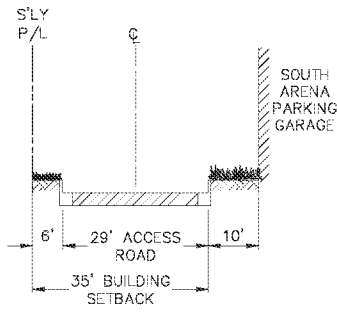
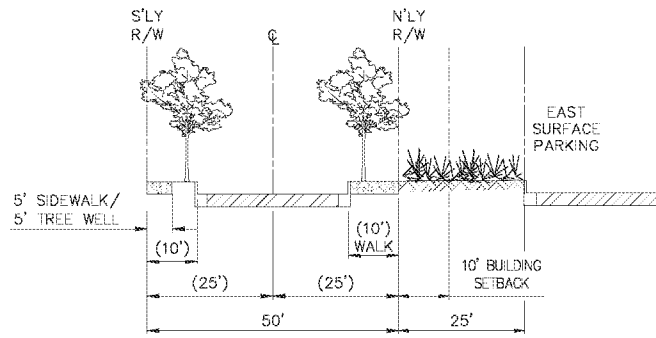


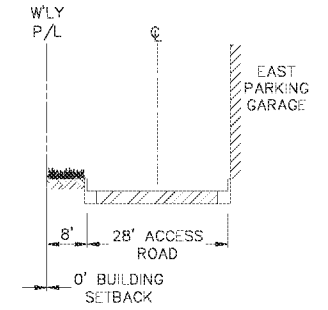
EXHIBIT 12b



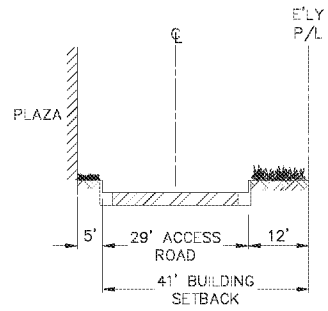
SECTION B1  
SOUTH ARENA  
PARKING GARAGE  
NOT TO SCALE



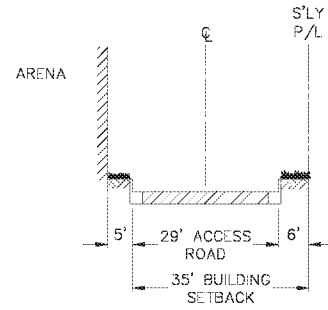
SECTION D1  
102ND STREET  
EAST PARKING GARAGE  
NOT TO SCALE



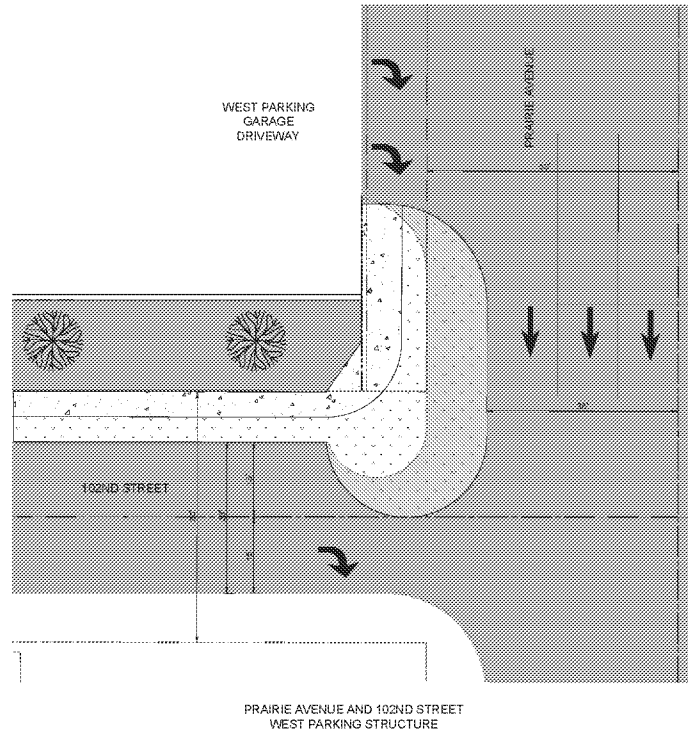
SECTION D2  
EAST PARKING GARAGE  
NOT TO SCALE



SECTION B2  
PLAZA  
NOT TO SCALE



SECTION B3  
ARENA  
NOT TO SCALE

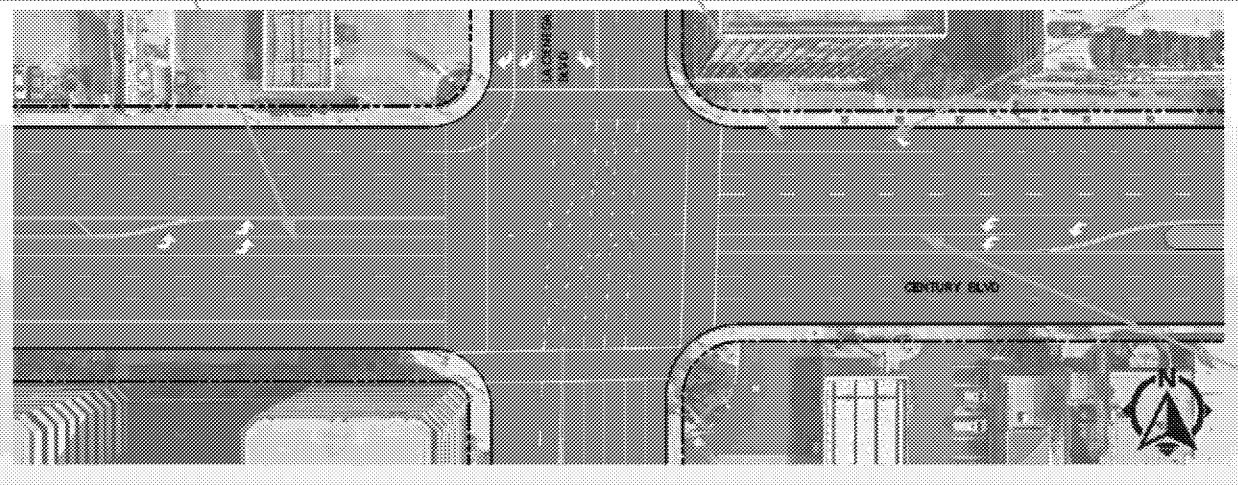


PRAIRIE AVENUE AND 102ND STREET  
WEST PARKING STRUCTURE

EXHIBIT 12c

TRAFFIC MITIGATION STREET IMPROVEMENTS

- 1. LA CIENEGA BOULEVARD / CENTURY BOULEVARD: If approved by the City of Inglewood and the City of Los Angeles Developer will implement capacity-increasing improvements at the 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 LAMP 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.



*Remove median island on the west leg and restripe the eastbound approach to add second left-turn lane.*

*Restripe the westbound approach to convert the outside through/right lane to a dedicated right-turn lane.*

*Provide Right Turn Overlap Phase for WB dedicated right turn lane.*

*Restripe the westbound approach to add second left-turn lane.*

**Existing Conditions**

**Purpose**

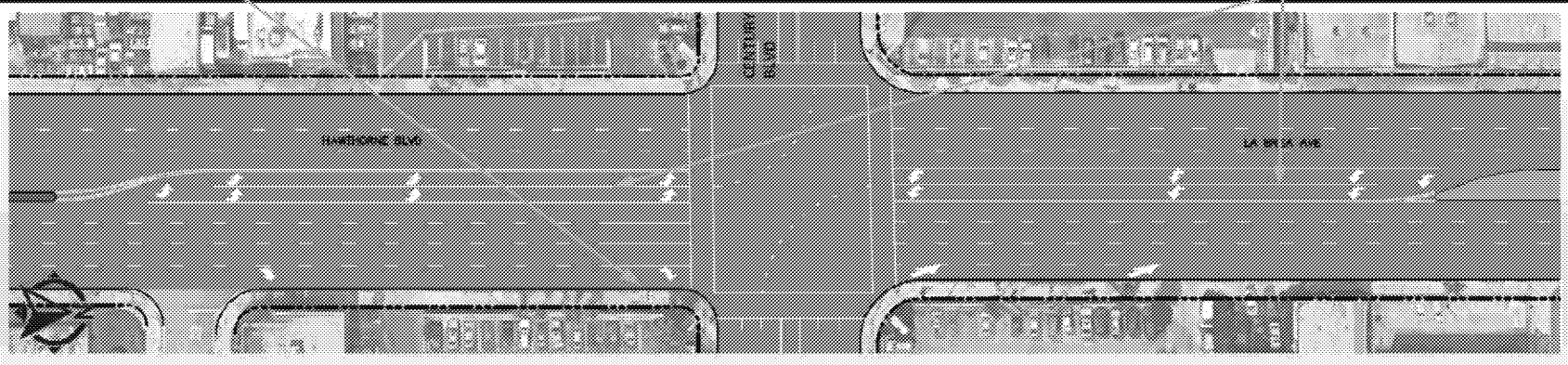
This improvement adds a second left-turn lane to both eastbound and westbound Century Boulevard at La Cienega Boulevard, which better accommodates left-turn traffic and allows for more traffic signal "green" time to be allocated to Century Boulevard. In addition, the new right-turn arrow for cars turning right from northbound La Cienega to eastbound Century more effectively accommodates prevent IBEC traffic exiting the I-405, limiting adverse effects to local street traffic

TRAFFIC MITIGATION STREET IMPROVEMENTS

- 2. HAWTHORNE BOULEVARD – LA BREA AVENUE / CENTURY BOULEVARD: Developer shall construct (via restriping, traffic signal modifications, and conversion of median) second left-turn lanes on the northbound and southbound approaches to the Century Boulevard/Hawthorne Boulevard/La Brea Boulevard intersection and operate the northbound right-turn with an overlap phase.

*Operate the northbound right-turn with an overlap phase.*

*Construct (via restriping and conversion of median) second left-turn lanes on the northbound and southbound approaches to the Hawthorne Boulevard-La Brea Avenue/Century Boulevard intersection.*



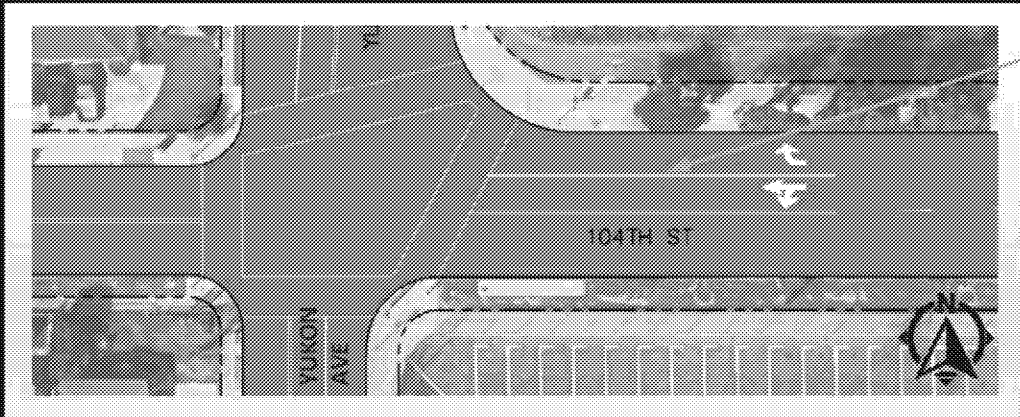
**Existing Conditions**

**Purpose**

This improvement adds a second left-turn lane to both northbound Hawthorne Boulevard and southbound La Brea Avenue at Century Boulevard, which better accommodates left-turn traffic and allows for more traffic signal "green" time to be allocated to Hawthorne Boulevard and La Brea Avenue. In addition, the new right-turn arrow for cars turning right from northbound Hawthorne to eastbound Century more effectively accommodates pre-event IBEC traffic exiting the I-105, limiting adverse effects to local street traffic

TRAFFIC MITIGATION STREET IMPROVEMENTS

- 3. YUKON AVENUE / 104<sup>TH</sup> STREET: Developer shall restripe the westbound 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. Modify traffic signals and connect this intersection to the existing ITS at Century & Yukon.

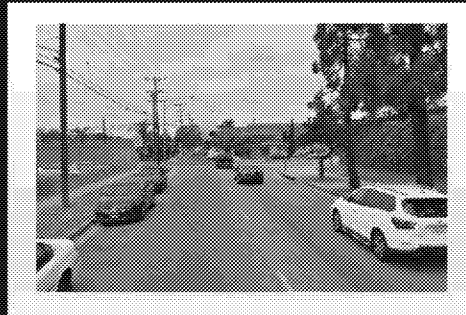
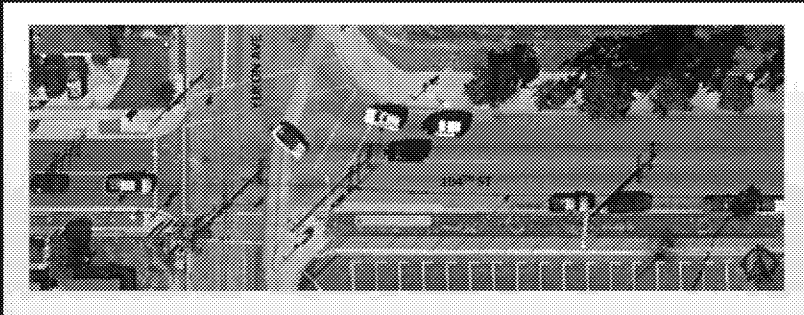


Existing Conditions

*Restripe the westbound 104<sup>th</sup> Street approach to Yukon Avenue to add a dedicated right-turn lane.*

**Purpose**

This improvement will aid in directing IBEC-related traffic north on Yukon Avenue and away from the nearby residential areas. In addition, the additional travel lane will improve traffic flow in the morning and afternoon peak traffic periods associated with the adjacent Morningside High School

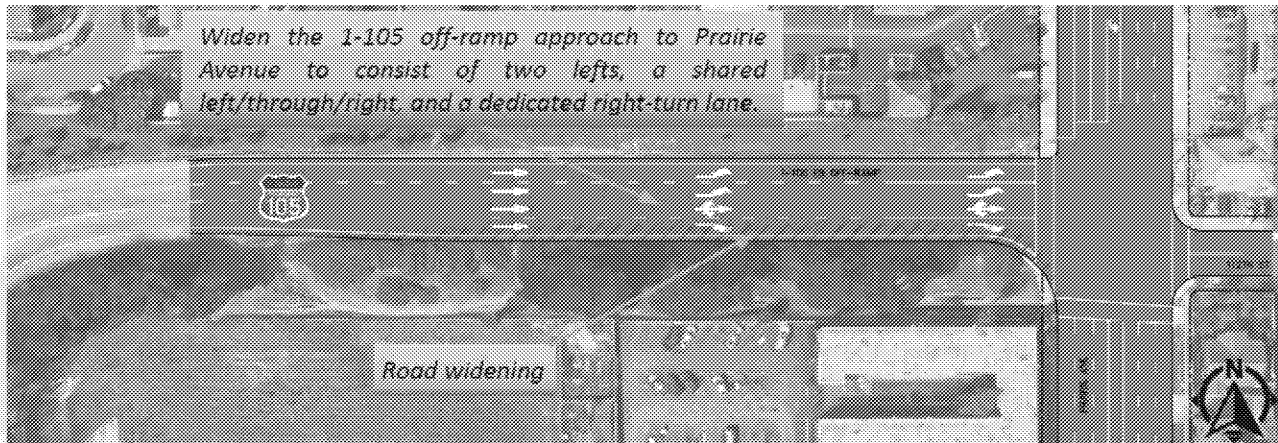




TRAFFIC MITIGATION STREET IMPROVEMENTS

- 4. PRAIRIE AVENUE / I-105 OFF-RAMP: If approved by the City of Inglewood and Caltrans, Developer shall widen the I 105 off-ramp approach to Prairie Avenue to consist of two lefts, a shared left/through/right, and a dedicated right-turn lane. Replace sign gantry. Modify Caltrans maintained traffic signals. This will 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.

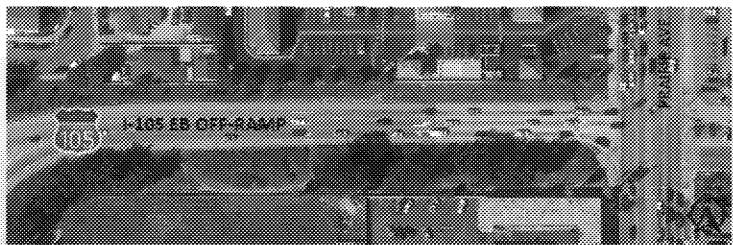
*This improvement will require going through the Caltrans project development process as a local agency-sponsored project. Depending on the complexity and cost of the improvement, this could include (but is not limited to) a cooperative agreement, permit engineering evaluation report, project study report, project report, environmental and engineering studies, project design, construction, etc.*



*Widen the I-105 off-ramp approach to Prairie Avenue to consist of two lefts, a shared left/through/right, and a dedicated right-turn lane.*

Road widening

EXHIBIT 13d



Existing Conditions

**Purpose**

This improvement provides a third lane for traffic turning left from the off-ramp towards the IBEC arena. This improvement will also benefit patrons attending events at the Forum and NFL stadium. The additional lane for the I-105 off-ramp ensures that traffic will not back-up onto the mainline I-105 freeway, and also allows for more traffic signal "green" time to be allocated to Prairie Avenue.

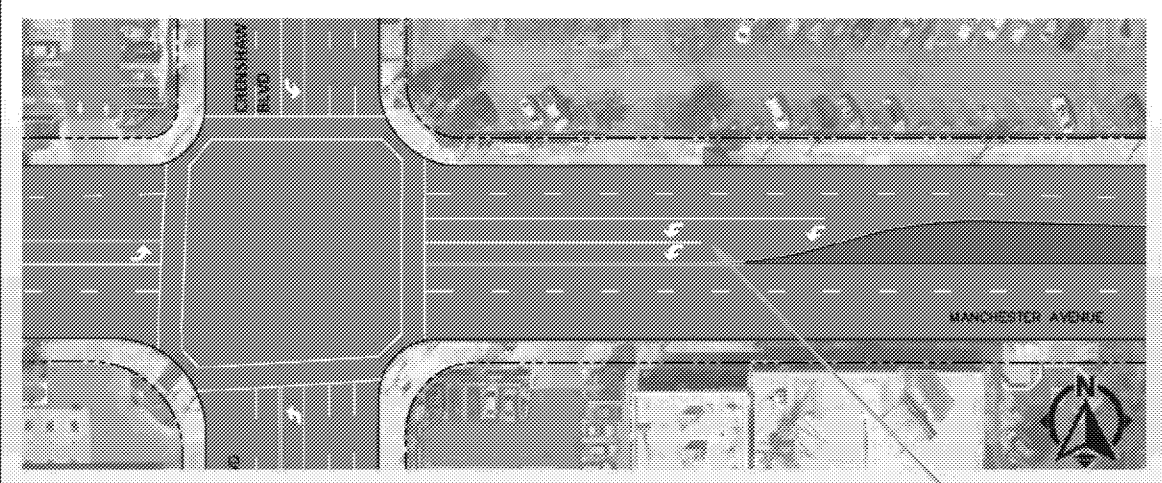
TRAFFIC MITIGATION STREET IMPROVEMENTS

- 5. Developer 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. Work includes modification of traffic signals as necessary.

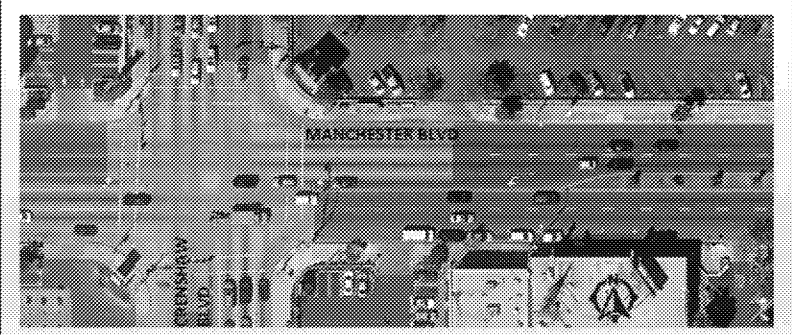


TRAFFIC MITIGATION STREET IMPROVEMENTS

- 6. CRENSHAW BOULEVARD / MANCHESTER AVENUE: Developer 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. Work includes striping, removing median, and modification of traffic signals as necessary.



**Purpose**  
This improvement adds a second left-turn lane to westbound Manchester Boulevard at Crenshaw Boulevard, which better accommodates left-turn traffic and allows for more traffic signal "green" time to be allocated to Manchester.



Existing Conditions

*Restripe the westbound approach of Crenshaw Boulevard/Manchester Avenue to provide a second left-turn lane, resulting in two left-turn lanes, one through lane and one shared through/right-turn lane.*

TRAFFIC MITIGATION STREET IMPROVEMENTS

- 7. CRENSHAW BOULEVARD / I-105 OFF RAMP: If approved by the City of Inglewood, City of Hawthorne, and Caltrans, Developer shall widen the I-105 westbound off-ramp at Crenshaw Boulevard to consist of one left, one left/through, and two right-turn lanes. Replace sign gantry. Modify Caltrans maintained traffic signals. 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.

*This will require going through 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.*

**Purpose**

This improvement allows for the designation of two full-time travel lanes for traffic turning right from the off-ramp towards the IBEC arena. This improvement will also benefit patrons attending events at the Forum and NFL stadium. The additional lane for the I-105 off-ramp ensures that traffic will not back-up onto the mainline I-105 freeway, and also allows for more traffic signal "green" time to be allocated to Crenshaw Boulevard.



## TRAFFIC MITIGATION STREET IMPROVEMENTS

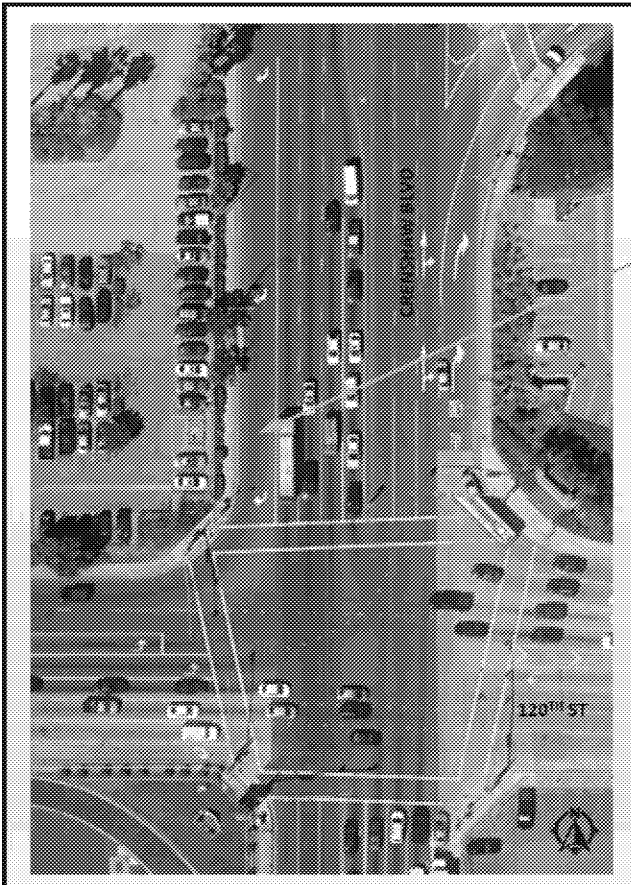
8. PRAIRIE AVENUE / 120<sup>TH</sup> STREET: If approved by the City of Hawthorne, and if there is enough existing right-of-way, Developer shall remove the median island and restripe the southbound approach of Prairie Avenue at 120th Street to provide a second left-turn lane, resulting in two left-turn lanes, two through lanes and one shared through/right-turn lane. Work includes modification of traffic signals as necessary.



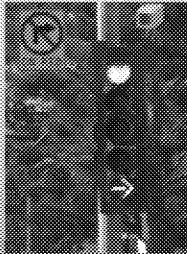
EXHIBIT 13h

TRAFFIC MITIGATION STREET IMPROVEMENTS

- 9. CRENSHAW BOULEVARD / 120<sup>TH</sup> STREET: If approved by the City of Hawthorne, Developer shall implement a southbound right-turn overlap signal phase at the intersection of Crenshaw Boulevard and 120th Street. Work includes modification of signage and traffic signals as necessary.



*Implement a southbound right-turn overlap signal phase at the intersection of Crenshaw Boulevard and 120<sup>th</sup> Street.*

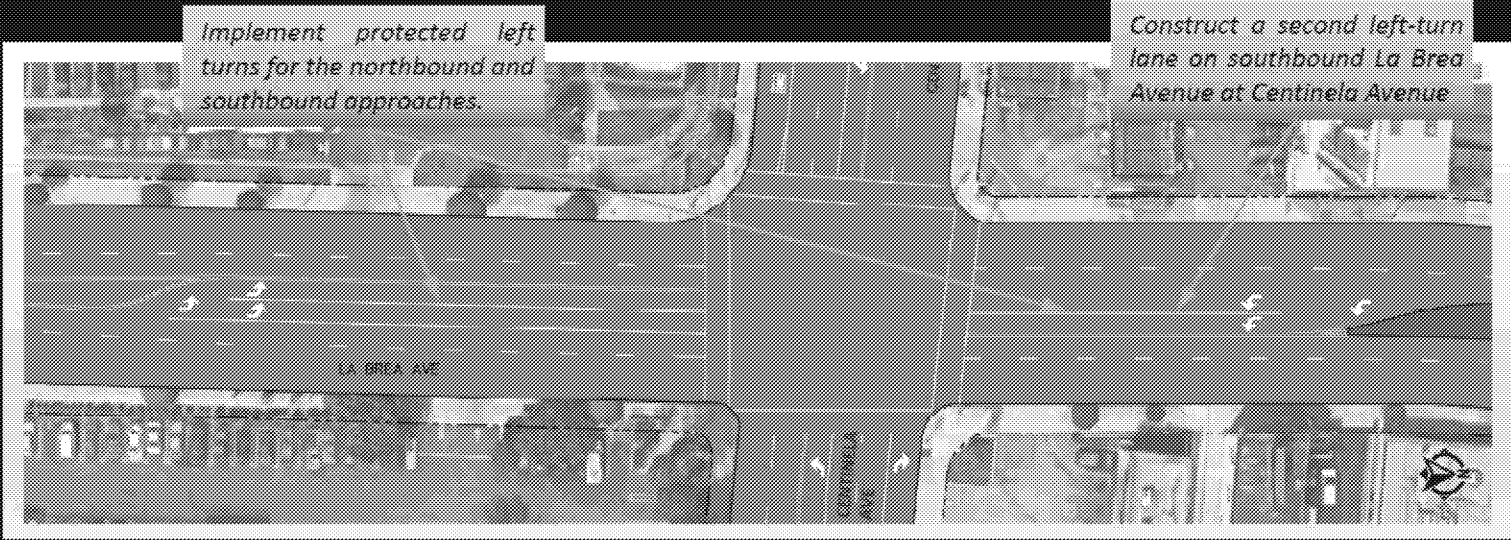


**Purpose**  
The new right-turn arrow for cars turning right from southbound Crenshaw Boulevard to westbound 120th Street and towards the I-105 Freeway on-ramp more effectively accommodates post-event IBEC traffic destined to the I-105, limiting adverse effects to local street traffic.



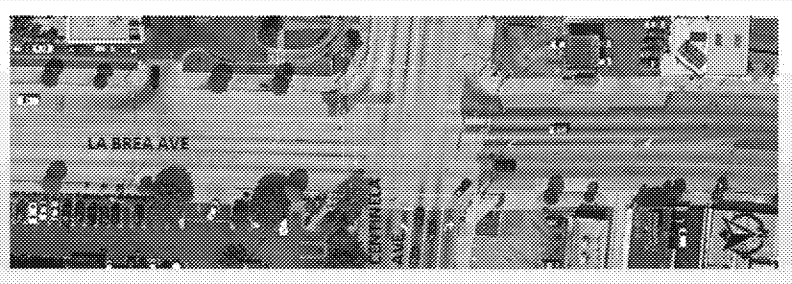
TRAFFIC MITIGATION STREET IMPROVEMENTS

- 10. LA BREA AVENUE / CENTINELA AVENUE: Developer 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. Work requires reducing exiting lane widths and modification of signage and traffic signals as necessary.



Implement protected left turns for the northbound and southbound approaches.

Construct a second left-turn lane on southbound La Brea Avenue at Centinela Avenue



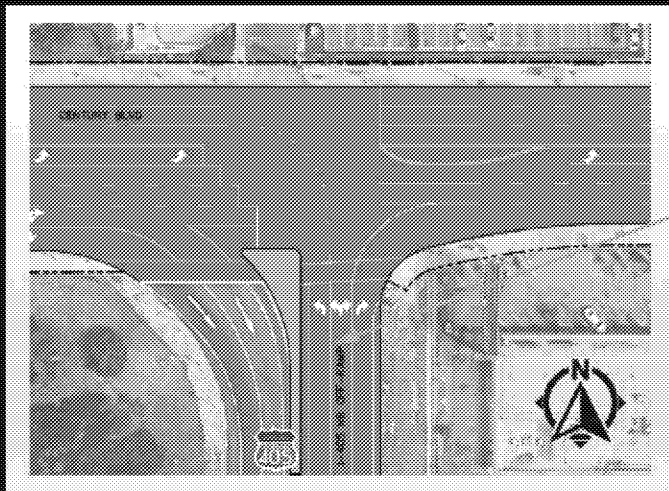
Existing Conditions

**Purpose**  
This improvement adds a second left-turn lane to southbound La Brea Avenue at Century Boulevard, which better accommodates left-turn traffic and allows for more traffic signal "green" time to be allocated to La Brea Avenue.

TRAFFIC MITIGATION STREET IMPROVEMENTS

- 11. I-405 NORTHBOUND OFF-RAMP / CENTURY BOULEVARD: If approved by the City of Inglewood and Caltrans, Developer shall restripe the center lane on the I-405 NB Off-Ramp at Century Boulevard to permit both left and right-turn movements. Modify signage and Caltrans maintained traffic signals. 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.

*This improvement requires going through 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.*

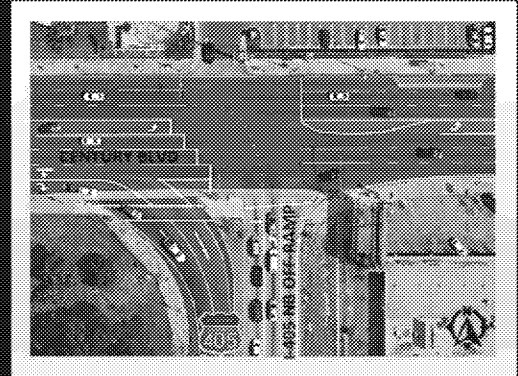


*Restripe the center lane on the I-405 NB Off-Ramp at Century Boulevard to permit both left and right turn movements.*

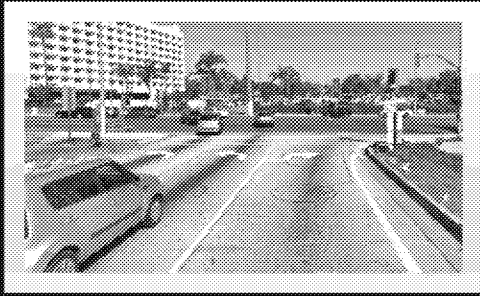


**Purpose**

This improvement provides a second lane for traffic turning right from the off-ramp towards the IBEC arena. This improvement will also benefit patrons attending events at the Forum and NFL stadium. The improvement for the I-405 off-ramp ensures that traffic will not back-up onto the mainline I-405 freeway, and also allows for more traffic signal "green" time to be allocated to Century Boulevard."



**Existing Conditions**



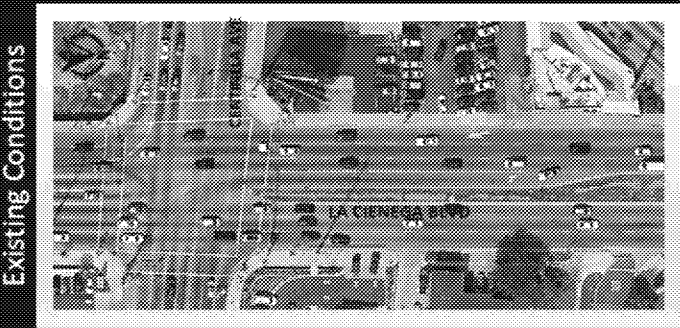


TRAFFIC MITIGATION STREET IMPROVEMENTS

- 13. LA CIENEGA BOULEVARD / CENTINELA AVENUE: If approved by the City of Inglewood and the City of Los Angeles, Developer shall remove the median island on the north leg and construct a second left-turn lane on southbound La Cienega Boulevard at Centinela Avenue. Work includes modification of traffic signals as necessary.



*Remove the median island on the north leg and construct a second left-turn lane on southbound La Cienega Boulevard at Centinela Avenue.*

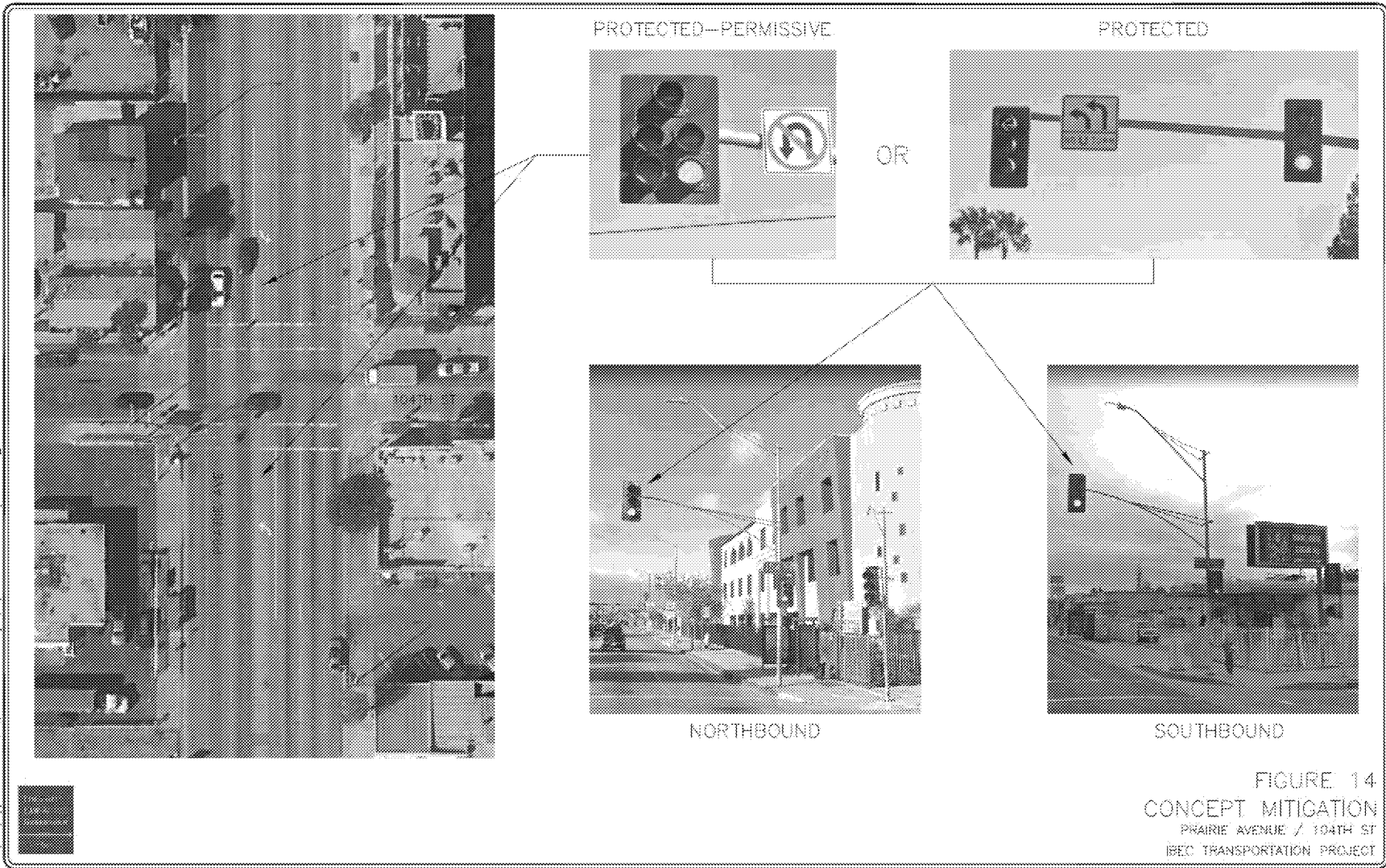


Existing Conditions

**Purpose**  
This improvement adds a second left-turn lane to southbound La Cienega Boulevard at Century Boulevard, which better accommodates left-turn traffic and allows for more traffic signal "green" time to be allocated to La Cienega Boulevard.

TRAFFIC MITIGATION STREET IMPROVEMENTS

14. 104<sup>TH</sup> STREET / PRAIRIE AVENUE: Developer shall implement protected or protected/permissive left-turn phasing on northbound and southbound Prairie Avenue at 104th Street. Work includes modification of striping and traffic signals as necessary.



TRAFFIC MITIGATION STREET IMPROVEMENTS

- 18. Developer shall restripe the northbound approach of Felton Avenue at Century Boulevard from a single left-through-right lane to one left/through lane and one right-turn lane. Work includes removing on street parking, striping, and modification of traffic signals as necessary.



EXHIBIT 13n

# APPENDIX A: SEC DESIGN GUIDELINES CHECKLIST

Section 1 Site Design and Features					
1.1 Setbacks					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-1.1.1				Minimum building setbacks comport with <i>Figure 1.1 Minimum Building Setbacks</i> , as measured from the property line.	<input type="checkbox"/>
DG-1.1.2				Uses, structures, or facilities allowed in minimum building setback areas: <ul style="list-style-type: none"> <li>• Driveways, alleyways, private streets, or similar vehicle circulation or access areas.</li> <li>• Sidewalks and pedestrian circulation areas and facilities.</li> <li>• Sound walls, privacy walls, security walls, screening, and similar features.</li> <li>• Landscaping.</li> <li>• Signage and graphic displays.</li> <li>• Public art.</li> </ul>	<input type="checkbox"/>
1.2 Development Intensity					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-1.2.1				Development comports with <i>Table 1.2 SE Overlay Zone Development Limitations</i> .	<input type="checkbox"/>

Section 1 Site Design and Features					
1.3 Walls and Fences					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-1.3.1				Walls or fences provided to buffer and enhance the appearance of development, provide security, privacy, sound reduction, or screening.	<input type="checkbox"/>
DG-1.3.2				Materials, colors, and appearance of walls or fences consistent with or complementary to the architecture and overall design of adjacent structures. All walls and fences shall be treated with anti-graffiti coating. Chain link fencing is prohibited if located within 20 feet of any public street or public space.	<input type="checkbox"/>
DG-1.3.3				Walls or fences viewable from the public right-of-way enhanced with vegetation, public art, aesthetic or architectural treatments.	<input type="checkbox"/>
DG-1.3.4				Height of any wall or fence meets the following, as applicable: <ul style="list-style-type: none"> <li>• Walls and fences that provide security for the Event Center Structure not more than 10 feet in height.</li> <li>• Walls and fences provided to screen equipment or other facilities 2 feet higher than the equipment or other facility for which the wall provides screening, but shall not exceed 8 feet in height, except as provided in (C).</li> <li>• All walls and fences, other than sound walls or sound barriers or walls and fences that provide security for the Event Center Structure, shall not exceed 6 feet in height where located within 20 feet of West Century Boulevard or South Prairie Avenue and shall not exceed 8 feet in height where located more than 20 feet from West Century Boulevard or South Prairie Avenue.</li> <li>• The height of sound walls or sound barriers comply with SEC Design Guidelines Section 5.6.</li> </ul>	<input type="checkbox"/>
DG-1.3.5				Security walls or fences incorporate the following: <ul style="list-style-type: none"> <li>• Security walls or fences constructed of sturdy materials, such as concrete masonry units (CMU) or bricks, treated wood or recycled plastic, or similar materials.</li> <li>• Metal fences consistent with the design of adjacent buildings or in areas not primarily viewed from public gathering spaces or from West Century Boulevard or South Prairie Avenue.</li> <li>• Bollards constructed of sturdy materials including recycled plastic, steel, and concrete as well as stainless steel pipe guards, and should use highly visible colors.</li> <li>• Security fences and gates may be comprised of independent free standing metallic construction that complements the design of adjacent architectural construction.</li> </ul>	<input type="checkbox"/>
DG-1.3.6				Temporary fencing (including chain link, wood, safety barricade, or other similar temporary fencing structure) for temporary events, special events, crowd management, safety hazard, or construction if removed following the related event or safety hazard; not subject to height limits.	<input type="checkbox"/>
DG-1.3.7				No barbed wire or other sharp or protruding objects on fences or walls.	<input type="checkbox"/>

Section 1 Site Design and Features					
1.4 Grading and Drainage					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-1.4.1				Shape of the ground plane and enabling slopes creates interest and variation.	<input type="checkbox"/>
DG-1.4.2				<p>Slopes incorporate the following considerations:</p> <ul style="list-style-type: none"> <li>• Slopes under 1% do not drain well unless they are paved and carefully finished.</li> <li>• Slopes under 4% appear flat and are usable for all kinds of intense activity.</li> <li>• Slopes between 4 and 10% appear as easy grades and are suitable for practically any use.</li> <li>• Slopes over 8% are not suitable for handicapped access.</li> <li>• Slopes over 10% appear steep and require noticeable effort to climb or to descend and are a desirable maximum for service driveways and parking areas.</li> <li>• Slopes over 25% are too steep for lawns and power mowing.</li> <li>• Slopes over 50% cannot be protected from erosion from heavy rains except by terracing.</li> </ul>	<input type="checkbox"/>
DG-1.4.3				Resulting ground surface after grading has positive drainage throughout, without any isolated depressions. Paved areas do not drain across public sidewalks.	<input type="checkbox"/>
DG-1.4.4				Surface water prevented from draining onto neighboring properties.	<input type="checkbox"/>
DG-1.4.5				<p>No driveways or ramps grade greater than 15%, except:</p> <ul style="list-style-type: none"> <li>• Grade up to 25% if any portion having a grade greater than 20% does not exceed 25 feet in length.</li> <li>• Any grade change in a driveway in excess of 15% has a minimum 10 feet transition section which divides the grade change into equal parts.</li> </ul>	<input type="checkbox"/>

Appendix A: SEC Design Guidelines Checklist

Section 2 Design Elements					
2.1 Massing and Scale					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-2.1.1		<input checked="" type="checkbox"/>		Physical transitions and/or setbacks from the Event Center structure to adjacent properties and to frontages along West Century Boulevard and South Prairie Avenue.	<input type="checkbox"/>
DG-2.1.2		<input checked="" type="checkbox"/>		Street wall reinforced with well-scaled elements or structures that are sensitive to the neighborhood context.	<input type="checkbox"/>
DG-2.1.3		<input checked="" type="checkbox"/>		Definition to a pedestrian scale environment through active frontages.	<input type="checkbox"/>
DG-2.1.4		<input checked="" type="checkbox"/>		Pedestrian scale elements such as arcades, colonnades, awnings, or structural projections included.	<input type="checkbox"/>
DG-2.1.5		<input checked="" type="checkbox"/>		Break down large floor plates and vary a building's height through the creation of smaller facades or forms.	<input type="checkbox"/>
DG-2.1.6		<input checked="" type="checkbox"/>		Variety in massing incorporated.	<input type="checkbox"/>
DG-2.1.7		<input checked="" type="checkbox"/>		All building elevations integrated into the overall design.	<input type="checkbox"/>
2.2 Height					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-2.2.1	<input checked="" type="checkbox"/>			Structures do not exceed heights shown in <i>Exhibit 2.2 Sports and Entertainment Complex Height</i> .	<input type="checkbox"/>

Section 2 Design Elements					
2.3 Frontage and Orientation					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-2.3.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Active frontages adjacent to the public right-of-way or gathering spaces included as shown in <i>Exhibit 2.3 Frontages</i> .	<input type="checkbox"/>
DG-2.3.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Aesthetic treatments on frontages included as shown in <i>Exhibit 2.3 Frontages</i> .	<input type="checkbox"/>
DG-2.3.3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Primary public entrances and primary elevations oriented toward West Century Boulevard and/or South Prairie Avenue.	<input type="checkbox"/>
DG-2.3.4	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Secondary or supplemental access to pedestrian areas or structures provided.	<input type="checkbox"/>
DG-2.3.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Doors, windows, and other openings of Event Center Supporting Structures designed with a high ratio of glazing to wall area facing pedestrian walkways and plaza spaces.	<input type="checkbox"/>
DG-2.3.6	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Functional loading areas, storage areas, and mechanical equipment accessed from internal site access roads.	<input type="checkbox"/>
DG-2.3.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Landscape buffers, screening walls, green screens, or other transition features provided between Sports and Entertainment Complex structures and adjacent residential uses where feasible considering site conditions.	<input type="checkbox"/>
DG-2.3.8	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Transition features provided between Sports and Entertainment Complex structures and non-residential adjacent uses where feasible considering site conditions.	<input type="checkbox"/>
2.4 Roofline and Profile					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-2.4.1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Roofs and upper level floors visible from West Century Boulevard establish a coherent skyline.	<input type="checkbox"/>
DG-2.4.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Roofline and profile design reflect of the overall design aesthetic.	<input type="checkbox"/>
DG-2.4.3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Roofline elements including parapet walls developed along all elevations viewed from a publicly accessible pedestrian sidewalk or walkway.	<input type="checkbox"/>
DG-2.4.4	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Roof elements composed of solid as well as other forms such as creative structural frames, trellises and pergolas or other features compatible with other building design elements.	<input type="checkbox"/>



Section 2 Design Elements					
2.5 Materials and Colors					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-2.5.1		<input checked="" type="checkbox"/>		The material palette for buildings provide variety and reinforce massing and changes in the horizontal or vertical plane.	<input type="checkbox"/>
DG-2.5.2		<input checked="" type="checkbox"/>		The color palette for buildings reinforces project site identity and complements changes in the horizontal or vertical plane.	<input type="checkbox"/>
DG-2.5.3		<input checked="" type="checkbox"/>		Exterior materials, textures and colors coordinated to express an intentional architectural theme.	<input type="checkbox"/>
DG-2.5.4		<input checked="" type="checkbox"/>		All exterior materials and colors are durable and will not readily deteriorate or fade from exposure to the elements.	<input type="checkbox"/>
DG-2.5.5	<input checked="" type="checkbox"/>			No low-quality materials such as stucco, plaster, and exterior insulation and finish systems (EIFS) at the ground-floor along any public streets, alleys, or public amenity spaces.	<input type="checkbox"/>
DG-2.5.6	<input checked="" type="checkbox"/>			Colors and materials utilized for paving and exterior building surfaces do not produce excessive reflected glare from the sun (e.g., mirrored glass or surfaces).	<input type="checkbox"/>
2.6 Equipment and Screening					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-2.6.1		<input checked="" type="checkbox"/>		Screening accomplished through walls, landscaping, or a combination of walls and landscaping, using materials that relate to the overall design or elements of the Sports and Entertainment Complex.	<input type="checkbox"/>
DG-2.6.2	<input checked="" type="checkbox"/>			Utilities and service areas and equipment, mechanical equipment, ducting, meters or other appurtenances and storage areas at the ground level screened from public right-of-way views and adjacent uses where feasible considering site conditions.	<input type="checkbox"/>
DG-2.6.3			<input checked="" type="checkbox"/>	Screening or higher parapet walls used to integrate mechanical equipment, ducting, meters, or other appurtenances above the ground level.	<input type="checkbox"/>
DG-2.6.4	<input checked="" type="checkbox"/>			<p>Areas used for storage, sorting, or loading of refuse and recyclable materials and related equipment enclosed and screened, and meet the following:</p> <ul style="list-style-type: none"> <li>The height of refuse and recycling enclosures shall be no less than five feet and sufficient to conceal the contents of the enclosure, including containers, with gates equal to the enclosure height.</li> <li>Enclosures shall be constructed of masonry, decorative block, or similar materials of a texture and color that blends with the overall design or adjacent building.</li> <li>Enclosures shall be constructed with an impermeable floor sloped to drain and designed so that it can be washed out and kept in a sanitary condition.</li> <li>The recycling and refuse enclosure or loading area shall be located in an area accessible to a collection vehicle.</li> </ul>	<input type="checkbox"/>
DG-2.6.5			<input checked="" type="checkbox"/>	Chain link fencing for anti-scaling and withstanding wind where appropriate, but avoided where visible from public spaces or within twenty feet of the public right-of-way along West Century Boulevard or South Prairie Avenue.	<input type="checkbox"/>

Section 2 Design Elements					
2.7 Pedestrian Bridges					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-2.7.1				Pedestrian bridges over public right-of-way provided.	<input type="checkbox"/>
DG-2.7.2				Any pedestrian bridge provides a minimum vertical clearance of 17 feet above the vehicular right of way from the lowest point of the bridge or meet the requirements identified by Section 309.2(2) of the Caltrans Highway Design Manual.	<input type="checkbox"/>
DG-2.7.3				Any pedestrian bridges provides a minimum of 20 feet in width to accommodate the pedestrian flows and provide an ADA-compliant walkway.	<input type="checkbox"/>
DG-2.7.4				Protective screening in the form of fence-type railings installed on any pedestrian bridge.	<input type="checkbox"/>
DG-2.7.5				Pedestrian bridges architecturally integrated with the design of the structures or elements at bridge termination points and provide visual connections to adjacent buildings and interesting visual terminations.	<input type="checkbox"/>
DG-2.7.6				Lighting provided at the pedestrian level for safety and security and exterior lighting provided under and adjacent to the pedestrian bridge for safety and visibility by all transportation modes	<input type="checkbox"/>
DG-2.7.7				Pedestrian bridges incorporate streetscape enhancements where they meet public right-of-way.	<input type="checkbox"/>

Section 3 Landscape Elements					
3.1 Landscape Design					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-3.1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All areas not covered by buildings or structures, enclosed for storage, or circulation elements incorporated into landscape design as Primary Landscape Areas or Secondary Landscape Areas ( <i>Figure 3.1 Landscape Design Areas</i> ).	<input type="checkbox"/>
DG-3.1.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Landscape design incorporates landscaped areas and plant materials, open space, and hardscape with exterior lighting, signage and graphics, walls and fences, and pedestrian pathways in a manner that complements adjacent buildings and the overall design.	<input type="checkbox"/>
DG-3.1.3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Landscape design uses a combination of treatments, features and elements, such as raised landforms, hardscaping, trees, shrubs, planters, and groundcover to enhance the appearance and pedestrian experience of the site.	<input type="checkbox"/>
3.2 Primary Landscape Areas					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-3.2.1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Primary Landscape Areas ( <i>Figure 3.1 Landscape Design Areas</i> ) composed of a mix of open space, landscaping, and hardscape elements that integrate with and compliment the architecture of structures and creates a sense of place that supports the overall design.	<input type="checkbox"/>
DG-3.2.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Primary Landscape Areas incorporate open space areas for pedestrian circulation, seating, eating and dining, and public gathering, recreation, and entertainment.	<input type="checkbox"/>
DG-3.2.3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Central pedestrian plaza is the primary open space feature.	<input type="checkbox"/>
3.3 Plaza Design					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-3.3.1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plaza design includes areas designed for public gathering, outdoor dining, recreation, and entertainment.	<input type="checkbox"/>
DG-3.3.2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Plaza includes seating, activity space, outdoor stage, amplified sound, public art and sculptural elements, interactive features, trellises and shade structures, and other architectural elements.	<input type="checkbox"/>
DG-3.3.3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plaza design creates strong connection between building forms, public streets and pedestrian pathways. Plaza entrances from the public street convey a welcoming and not fortress-like presence.	<input type="checkbox"/>
DG-3.3.4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plaza design establishes comfortable pedestrian zones highlighted by plazas and connections to the street, pedestrian bridges, and adjacent activity centers.	<input type="checkbox"/>
DG-3.3.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plaza design provides ample space to allow for free movement of pedestrians to and from the main pedestrian entrances of the Sports and Entertainment Complex site to the Event Center.	<input type="checkbox"/>

Section 3 Landscape Elements					
3.4 Secondary Landscape Areas					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-3.4.1				Secondary Landscape Areas ( <i>Figure 3.1 Landscape Design Areas</i> ) landscaping or hardscaping consistent with the overall landscape design.	<input type="checkbox"/>
DG-3.4.2				Secondary Landscape Areas support the program of adjacent structures or areas.	<input type="checkbox"/>
DG-3.4.3				Landscape buffers between parking, loading, and public spaces in Secondary Landscape Areas.	<input type="checkbox"/>
DG-3.4.4				Secondary Landscape Areas surrounding parking facilities planted with trees at a quantity equivalent to one for each thirty lineal feet of street frontage as well as suitable shrubs, groundcover, and berms.	<input type="checkbox"/>
3.5 Plant Materials and Irrigation					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-3.5.1				Species in planted landscaped areas incorporate the following considerations: <ul style="list-style-type: none"> <li>Plant species reflect preference for native, drought tolerant or drought resistant plants.</li> <li>Plant material installed in healthy, vigorous condition typical to the species.</li> <li>Plant material selection informed by soil, water, and sun conditions and other factors.</li> </ul>	<input type="checkbox"/>
DG-3.5.2				Landscape design incorporates the following size and spacing considerations: <ul style="list-style-type: none"> <li>Trees proportional to the landscaped area (may be planted in groups).</li> <li>Tree plantings should be 24-inch box minimum size.</li> <li>Tree wells 4 feet by 4 feet (unless conditions require alternative dimensions).</li> <li>Shrubs planted to serve as a hedge or screen minimum 5-gallon size, planted with 2 to 4 feet spacing (depending on plant species).</li> <li>Shrubs planted to serve as groundcover minimum one-gallon and planted at 18 to 24 inches on center. Other plants serving as groundcover spaced at a maximum of 6 to 8 inches on center (depending on plant species).</li> <li>Trees planted at a quantity approximate to one tree for each 200 square feet of landscaped area.</li> </ul>	<input type="checkbox"/>
DG-3.5.3				Street trees not planted in areas where trees would interfere with anticipated pedestrian flows.	<input type="checkbox"/>
DG-3.5.4				Irrigation systems for all planted areas equipped with automatic controls and meet CalGreen California Model Water Efficiency guidelines.	<input type="checkbox"/>
DG-3.5.5				Landscaping maintained in a neat and healthy condition, including proper trimming or mowing, weeding, removal of litter, fertilizing, regular watering and replacement of diseased or dead plants.	<input type="checkbox"/>

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Section 4 Signage and Graphics					
4.2 Building Identification Signs					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.2.1				Building identification signs consistent with <i>Table 4.2 Building Identification Signs</i> and <i>Entertainment Signs</i> and <i>Figure 4.1 Sports and Entertainment Complex Sign Zones</i> .	<input type="checkbox"/>
DG-4.2.2				Building identification façade sign breaks the plane of the roof of the building on which it appears.	<input type="checkbox"/>
DG-4.2.3				Text of any slogan that appears on or is part of a building identification sign is smaller in scale than other textual elements of the sign such that the slogan is not the primary focus of the sign.	<input type="checkbox"/>
DG-4.2.4				Building identification signs conform to all relevant provisions of SEC Design Guidelines.	<input type="checkbox"/>
4.3 Business Identification Signs					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.3.1				Business identification signs consistent with <i>Table 4.3 Business Identification Signs</i> and <i>Entertainment Signs</i> and <i>Figure 4.1 Sports and Entertainment Complex Sign Zones</i> .	<input type="checkbox"/>
DG-4.3.2				Business identification signs conform to all relevant provisions of SEC Design Guidelines.	<input type="checkbox"/>
4.4 Informational Signs					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.4.1				Informational signs consistent with <i>Table 4.4 Informational Signs</i> and <i>Figure 4.1 Sports and Entertainment Complex Sign Zones</i> .	<input type="checkbox"/>
DG-4.4.2				Informational signs used to aid and guide the flow of vehicular and pedestrian traffic through the site and provide information to visitors, employees, and the public about the Sports and Entertainment Complex operations, amenities, safety measures, and similar information.	<input type="checkbox"/>
DG-4.4.3				Informational signs conform to all relevant provisions of SEC Design Guidelines.	<input type="checkbox"/>
4.5 Message and Entertainment Signs					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.5.1				Message signs and Entertainment signs consistent with <i>Table 4.5 Message and Entertainment Signs</i> and <i>Figure 4.1 Sports and Entertainment Complex Sign Zones</i> .	<input type="checkbox"/>
DG-4.5.2				Message signs and entertainment signs conform to all relevant provisions of SEC Design Guidelines.	<input type="checkbox"/>

Section 4 Signage and Graphics					
4.6 Orientation					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.6.1				Business Identification Signs and Informational Signs oriented to be primarily viewed by the intended audience.	<input type="checkbox"/>
DG-4.6.2				All exterior Digital Display Signs shall include louvers integrally cast into sign faces to improve visibility and direct the display to the intended audience and reduce visibility of the sign face and direct light away from overhead flight paths.	<input type="checkbox"/>
DG-4.6.3				Externally-oriented signs consistent with orientation illustrated in in <i>Figure 4.6 External Orientation</i> .	<input type="checkbox"/>
4.7 Projection					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.7.1				Façade signs project 3 feet or less into public right-of-way; projections into public right-of-way approved by Public Works.	<input type="checkbox"/>
DG-4.7.2				Any façade sign projecting into public right-of-way maintains minimum of 10 feet of vertical clearance from the bottom of the projecting sign to finished grade below.	<input type="checkbox"/>
4.8 Illumination and Brightness					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.8.1				Sign illuminated by internal or external means.	<input type="checkbox"/>
DG-4.8.2				All Signs conform to approved Lighting Design Plan, as defined and required by Mitigation Measure 3.1- 2(b) of the IBEC MMRP.	<input type="checkbox"/>
DG-4.8.3				All Digital Display Signs and Interactive Display Signs: <ul style="list-style-type: none"> <li>• Controllable by the combination of a photocell that measures available daylight and remote adjustment capabilities that control the luminance levels of the Sign</li> <li>• Utilize automatic dimming technology</li> <li>• Include a default mechanism that causes the Sign to revert immediately to a black screen if the Sign malfunctions in a way that causes the display to wholly or partly flash.</li> </ul>	<input type="checkbox"/>
DG-4.8.4				Digital Display Signs and Interactive Display Signs comply with maximum daytime and nighttime luminance levels in Table 4.8 Digital Luminance Levels.	<input type="checkbox"/>
DG-4.8.5				Digital Display Signs transition smoothly at a consistent rate of speed from permitted Daytime to Nighttime Luminance Level, beginning no less than 20 minutes prior to sunset and concluding the transition to nighttime intensity level no less than 20 minutes after sunset.	<input type="checkbox"/>
DG-4.8.6				Digital Display Signs transition smoothly at a consistent rate of speed from permitted Nighttime to Daytime Luminance Level, beginning no less than 20 minutes prior to sunrise and concluding the transition to daytime intensity level no less than 20 minutes after sunrise.	<input type="checkbox"/>

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Section 4 Signage and Graphics					
4.9 Presentation					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.9.1				<p>Images displayed on any External Primary-oriented Digital Display Message Sign presented continuously for at least eight seconds following the completion of its transition from the previous message and including the transition time to the next message.</p> <ul style="list-style-type: none"> <li>When an image is changed electronically, the transition between presentation of the previous image and presentation of the next image accomplished in one-half second or less. The transition period measured as that period between the time that the previous image is fully presented and the next image is fully presented.</li> </ul>	
DG-4.9.2				Internal-oriented Digital Display or Interactive Display Entertainment Signs not subject to a limitation on time between transition, display time, or motion.	
4.10 Materials					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.10.1				Permanent signs constructed of materials that are durable and not likely to fade, corrode, or otherwise deteriorate.	
DG-4.10.1				Signs do not use highly reflective materials such as mirrored glass.	
4.11 Exempt Signs					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-4.11.1				<p>Signs and/or sign structures are exempt from the permit requirement of IMC Section 12-72:</p> <ul style="list-style-type: none"> <li>Interior Signs</li> <li>Portable Signs</li> <li>Temporary Signs</li> <li>String Pennants</li> <li>Public and Community Notices and Signs</li> <li>Building Banner Graphics</li> <li>Changeable Copy Signs</li> </ul>	

Section 5 Lighting and Acoustics					
5.1 Exterior Lighted Areas					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-5.1.1				Exterior lighting integrated into the design of structures or relate to the overall design of the Sports and Entertainment Complex to encourage pedestrian activity and support a modern sports and entertainment environment.	<input type="checkbox"/>
DG-5.1.2				Pedestrian entrances, walkways, and activity areas, vehicle entrances and driveways, parking areas, and service areas well-lit to provide security and safety.	<input type="checkbox"/>
DG-5.1.3				Prominent exterior lighting features not required for security and safety lighting equipped to control the intensity of lighting and allow for dimming or color variation.	<input type="checkbox"/>
5.2 Architectural Lighting					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-5.2.1				Architectural lighting accentuate major architectural features and relate to pedestrian scale.	<input type="checkbox"/>
DG-5.2.2				<p>Sports and Entertainment Complex structures incorporate large-scale architectural lighting, which may include the following:</p> <ul style="list-style-type: none"> <li>• Large-scale architectural lighting elements placed on a building façade to highlight or accentuate elements of the architecture of the structure</li> <li>• Integrated-large scale lighting that is attached directly to and made integral with architectural elements on the facade of a building</li> </ul>	<input type="checkbox"/>
DG-5.2.3				Large-scale architectural lighting not considered signage under SEC Design Guidelines.	<input type="checkbox"/>



Appendix A: SEC Design Guidelines Checklist

Section 5 Lighting and Acoustics					
5.3 Exterior Luminaries and Fixtures					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-5.3.1		<input checked="" type="checkbox"/>		Luminaries and lighting fixtures coordinated on the basis of function and appearance, architecturally compatible with the structures overall design of the Sports and Entertainment Complex.	<input type="checkbox"/>
DG-5.3.2		<input checked="" type="checkbox"/>		LED fixtures or other similarly energy-efficient lighting technology for exterior lighting fixtures.	<input type="checkbox"/>
DG-5.3.3			<input checked="" type="checkbox"/>	Outdoor security and architectural lighting includes low-level exterior lights mounted to the building and along pathways for security and wayfinding purposes.	<input type="checkbox"/>
DG-5.3.4	<input checked="" type="checkbox"/>			No permanent fixtures with exposed bulbs for exterior lighting.	<input type="checkbox"/>
DG-5.3.5	<input checked="" type="checkbox"/>			No searchlights, spotlights, or other similar fixtures directed to the open sky or areas outside the Sports and Entertainment Complex site.	<input type="checkbox"/>
DG-5.3.6		<input checked="" type="checkbox"/>		Electrical service for all lighting placed underground or within structures unless physically infeasible.	<input type="checkbox"/>
5.4 Direction and Shielding					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-5.4.1		<input checked="" type="checkbox"/>		Exterior lighting installed, directed and shielded to direct the majority of artificial light to buildings, objects, or target areas within the boundaries of the Sports and Entertainment Complex and minimize light spill to adjacent properties.	<input type="checkbox"/>
DG-5.4.2		<input checked="" type="checkbox"/>		Security and safety lighting recessed, hooded, and located to illuminate only the intended area.	<input type="checkbox"/>
DG-5.4.3		<input checked="" type="checkbox"/>		Exterior lighting placement and direction designed to work with structural and/or vegetative screening to prevent light spill to adjacent properties.	<input type="checkbox"/>
DG-5.4.4		<input checked="" type="checkbox"/>		Lighting for parking facilities designed to direct the majority of light into the parking facility and minimize light spill to adjacent properties.	<input type="checkbox"/>
5.5 Lighting Design Plan					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-5.5.1	<input checked="" type="checkbox"/>			Sports and Entertainment Complex exterior lighting conforms to approved Lighting Design Plan, as defined and required by Mitigation Measure 3.1-2(b) of the IBEC MMRP.	<input type="checkbox"/>
DG-5.5.2	<input checked="" type="checkbox"/>			Sports and Entertainment Complex includes any lighting or marking requirements required by Mitigation Measure 3.8-5 of the IBEC MMRP.	<input type="checkbox"/>

Section 5 Lighting and Acoustics					
5.6 Acoustic Facilities					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-5.6.1				Sound walls or barriers located in the areas shown in <i>Figure 1.3 Walls and Fences</i> or located in areas that serve a similar purpose and function.	<input type="checkbox"/>
DG-5.6.2				Sound walls or barriers meet the following standards: <ul style="list-style-type: none"> <li>• Solid with no gaps or cracks that might otherwise be considered acoustical "leaks."</li> <li>• Sufficient mass so as to provide a Sound Transmission Class (STC) rating of at least 27.</li> <li>• Noise Reduction Coefficient (NRC) on the receiver-side face shall be NRC 0.85 or greater.</li> <li>• Publicly visible faces feature vegetation or other aesthetic treatments, as long as such treatments do not inhibit the required acoustical performance.</li> <li>• Sound walls or barriers do not exceed 15 feet or the height necessary to meet the performance standards established by Mitigation Measure 3.11-2(a) of the IBEC MMRP, whichever is higher.</li> </ul>	<input type="checkbox"/>
DG-5.6.3				Outdoor sound amplification system, equipment, and related structures designed to limit noise levels near noise-sensitive receptors through design considerations such as placement, distribution, directivity, orientation, number of speakers and/or volume controls.	<input type="checkbox"/>
DG-5.6.4				Sound-absorbing materials included on the exterior of buildings surrounding gathering spaces where feasible and effective to reduce noise levels to sensitive receptors.	<input type="checkbox"/>
DG-5.6.5				Sound-absorbing materials incorporated into the design of parking facilities where feasible and effective to reduce noise levels to sensitive receptors.	<input type="checkbox"/>
DG-5.6.6				Rooftop outdoor restaurant or dining area includes an enclosure such as glass to serve as a noise barrier.	<input type="checkbox"/>
DG-5.6.7				Noise generating mechanical equipment located the furthest feasible distance away from noise-sensitive receptors considering site conditions and function.	<input type="checkbox"/>
DG-5.6.8				Noise generating mechanical equipment designed and installed to limit noise to noise-sensitive receptors with acoustical enclosures, silencers, barriers, relocation, or other noise-reducing approaches.	<input type="checkbox"/>
DG-5.6.9				The Sports and Entertainment Complex conforms to an approved Operational Noise Reduction Plan, as defined and required by Mitigation Measure 3.11-2(a) of the IBEC MMRP.	<input type="checkbox"/>

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Section 6 Circulation					
6.1 Vehicular Circulation					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-6.1.1				Vehicular access to parking facilities provided from West Century Boulevard, South Prairie Avenue and/or West 102nd Street.	<input type="checkbox"/>
DG-6.1.2				Vehicular access points to the Sports and Entertainment Complex designed to be clearly visible and accommodate event-related traffic management and security measures.	<input type="checkbox"/>
DG-6.1.3				Pick-up and drop-off area for shuttles provided on South Prairie Avenue.	<input type="checkbox"/>
DG-6.1.4				Parking and vehicle circulation facilities designed to provide access to and manage the circulation of vehicles.	<input type="checkbox"/>
DG-6.1.5				Truck access to loading areas within the Sports and Entertainment Complex provided from West Century Boulevard and/or West 102nd Street.	<input type="checkbox"/>
DG-6.1.6				Emergency vehicle access and onsite wayfinding signage to the Sports and Entertainment Complex from provided as required and approved by the Los Angeles County Fire Department.	<input type="checkbox"/>
6.2 Pedestrian Circulation					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-6.2.1				Pedestrian circulation network and facilities facilitate walkability and connection to publicly-accessible areas throughout the Sports and Entertainment Complex and adjacent development.	<input type="checkbox"/>
DG-6.2.2				Pedestrian pathways designed to accommodate pedestrian traffic and access patterns and security features and operations during all event conditions, including paving or other forms of visible pathway delineation to create clear paths of travel.	<input type="checkbox"/>
DG-6.2.3				Sports and Entertainment Complex includes well-marked, clearly-visible entrances; publicly-accessible entrances include architectural or graphic treatments compatible with the overall design.	<input type="checkbox"/>
DG-6.2.4				Pedestrian routes direct pedestrians to the main circulation areas within the Sports and Entertainment Complex and the Arena.	<input type="checkbox"/>
DG-6.2.5				All publicly-accessible pedestrian routes, gathering spaces, and buildings with requirements of the Americans with Disabilities Act (ADA).	<input type="checkbox"/>

Section 6 Circulation					
6.3 Pedestrian Features					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-6.3.1		<input checked="" type="checkbox"/>		Overall site design includes pedestrian scale elements and incorporate pedestrian-scale lighting, signage and wayfinding features to promote an attractive and lively environment for walking.	<input type="checkbox"/>
DG-6.3.2		<input checked="" type="checkbox"/>		Pedestrian features such as stairs, walkways, pedestrian bridges, sidewalks, and seating areas sensitive to the human scale and integrated into the overall site design and architecture.	<input type="checkbox"/>
DG-6.3.3			<input checked="" type="checkbox"/>	Pedestrian circulation areas supplemented with elements that create ground-level interest.	<input type="checkbox"/>
DG-6.3.4			<input checked="" type="checkbox"/>	Landscape design incorporates pedestrian amenities.	<input type="checkbox"/>
6.4 Pedestrian Grades and Ramps					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-6.4.1	<input checked="" type="checkbox"/>			Ramps in pedestrian walkways have a maximum slope of 1:12, minimum clear width of 36 inches, and landing lengths of 60 inches.	<input type="checkbox"/>
DG-6.4.2	<input checked="" type="checkbox"/>			Ramps in pedestrian walkways contain a detectable warning device (e.g., raised dome surface and contrasting color).	<input type="checkbox"/>
DG-6.4.3	<input checked="" type="checkbox"/>			Curb ramps installed wherever a sidewalk crosses a curb.	<input type="checkbox"/>

Appendix A: SEC Design Guidelines Checklist

Section 7 Parking					
7.1 Parking and Transportation Facilities					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-7.1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required automobile provided within any parking facility within the Sports and Entertainment Complex.	<input type="checkbox"/>
DG-7.1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Parking provided for coach buses and microtransit, mini-bus, or paratransit vehicles.	<input type="checkbox"/>
DG-7.1.3	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Areas provided to accommodate taxis, TNC vehicles, or vehicles providing similar ridesharing or ridehailing services, including a pick-up and drop-off area for passengers and a queuing area for such vehicles.	<input type="checkbox"/>
DG-7.1.4	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Additional parking in excess of the required parking spaces provided for specialized vehicles such as media broadcast trucks or other vehicles.	<input type="checkbox"/>
DG-7.1.5	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Valet parking provided.	<input type="checkbox"/>
7.2 TNC Facilities					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-7.2.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Passenger pick-up and drop-off areas or facilities providing passenger access to TNC, taxi, or similar vehicles designed to provide safe pedestrian access between such vehicles and pedestrian circulation areas.	<input type="checkbox"/>
DG-7.2.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Transportation facilities include a vehicle queuing area to allow TNC, taxi, or similar vehicles to access passenger pick-up and drop-off areas or facilities.	<input type="checkbox"/>
DG-7.2.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Any lane for queuing for taxi, TNC, or similar vehicles minimum width of 8 feet.	<input type="checkbox"/>
DG-7.2.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Pavement and drainage for surface lot TNC facilities complies with IMC § 12-55.2.	<input type="checkbox"/>

Section 7 Parking					
7.3 Transportation Demand Management					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-7.3.1				Preferential parking for employee carpool or vanpool vehicles provided within parking facilities in locations that provide convenient access for employees and designated through clearly visible signage or space markings.	<input type="checkbox"/>
DG-7.3.2				Information about alternative modes of transportation such as public transit, ridesharing, bicycling, and pedestrian modes and related available programs and facilities provided via information kiosk, bulletin board located, or similar feature.	<input type="checkbox"/>
DG-7.3.3				Bicycle parking spaces and facilities provided: <ul style="list-style-type: none"> <li>• Minimum of 60 bicycle parking spaces available for use by employees;</li> <li>• Minimum of 23 bicycle parking spaces available for use by patrons;</li> <li>• Shower and locker facilities available to employees;</li> <li>• Bicycle repair station accessible to employees and patrons.</li> </ul>	<input type="checkbox"/>
DG-7.3.4				Bicycle parking and facilities provided in areas within the Sports and Entertainment Complex that provides safe and convenient access to employees and patrons visitors, considering site conditions	<input type="checkbox"/>
7.4 Vehicular Access to Parking and Transportation Facilities					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-7.4.1				Driveways providing vehicular access to a parking or transportation facility provide dedicated ingress lanes or egress lanes, two-way lanes, or reversible ingress/egress lanes.	<input type="checkbox"/>
DG-7.4.2				Width of any dedicated ingress lane or egress lane, or reversible ingress/egress lane providing access to a parking or transportation facility not less than 10 feet.	<input type="checkbox"/>
DG-7.4.3				Width of any two-way lane providing access to a parking or transportation facility not less than 20 feet.	<input type="checkbox"/>
DG-7.4.4				Driveway that provides ingress or egress to a parking or transportation facility closed or obstructed to prevent ingress or egress when such access is not required to provide parking for a use or event within the Sports and Entertainment Complex or as necessary to implement a transportation management plan or strategies, so long as access to the parking or transportation facility is adequately maintained to meet the parking requirements of uses in operation.	<input type="checkbox"/>
DG-7.4.5				Gate, raisable arm, or other device or technology to control or regulate vehicular ingress or egress to a parking or transportation facility.	<input type="checkbox"/>
DG-7.4.6				Location and function of any device or technology used to control or regulate vehicular access to a parking or transportation facility designed to reduce the need for queuing on public streets to enter the facility, as feasible considering site conditions, event conditions, and vehicular circulation.	<input type="checkbox"/>
DG-7.4.7				Driveway providing ingress or egress to any parking or transportation facility paved to standards not less than required per IMC Section 12-55.2.	<input type="checkbox"/>

Section 7 Parking					
7.5 Parking Facility Design					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-7.5.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Traffic circulation within any facility or portion of a facility providing required automobile parking complies with IMC Section 12-55.	<input type="checkbox"/>
DG-7.5.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Access and turning radius for any facility or portion of a facility providing required automobile parking complies with IM Section 12-54.	<input type="checkbox"/>
DG-7.5.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Driveway slopes and ramps for any facility or portion of a facility providing required automobile parking complies with IMC Section 12-54.1.	<input type="checkbox"/>
DG-7.5.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Parking space striping for any facility or portion of a facility providing required automobile parking complies with IMC Section 12-55.1.	<input type="checkbox"/>
DG-7.5.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Parking lot pavement and drainage for any facility or portion of a facility providing required automobile parking within a surface lot complies with IMC Section 12-55.2.	<input type="checkbox"/>
DG-7.5.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Parking slope of any facility or portion of a facility providing required automobile parking complies with IMC Section 12-55.3.	<input type="checkbox"/>
DG-7.5.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Continuous raised concrete curbs provided three feet from the end of a parking space as necessary to ensure that any parked vehicle will not touch any wall, building, or other object.	<input type="checkbox"/>
DG-7.5.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Wheel stops provided where necessary to protect landscaping, parking equipment, or other infrastructure and should be located to avoid tripping hazards.	<input type="checkbox"/>
DG-7.5.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Visual impact of parking or transportation facilities reduced by providing landscape buffer areas, screening, or natural topography or planned grading.	<input type="checkbox"/>
7.6 Parking Space Dimensions					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-7.6.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required automobile parking spaces comply with <i>Table 7.6 Parking Space Dimensions</i> .	<input type="checkbox"/>
DG-7.6.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Parking spaces provided for coach buses, microtransit, mini-bus, or paratransit vehicles comply with <i>Table 7.6 Parking Space Dimensions</i> .	<input type="checkbox"/>
DG-7.6.3	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Compact parking spaces provided consistent with IMC Section 12-49(A).	<input type="checkbox"/>
DG-7.6.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tandem parking not utilized to satisfy the required number of parking spaces.	<input type="checkbox"/>

Section 7 Parking					
7.7 Accessible Parking					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-7.7.1				Accessible parking provided per the requirements IMC Section 12-57 and any applicable State of California requirements.	<input type="checkbox"/>
DG-7.7.2				Required accessible parking spaces provided in any parking facility within the Sports and Entertainment Complex.	<input type="checkbox"/>



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Section 8 Loading					
8.1 Loading Space Location					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-8.1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required loading spaces accommodated entirely within the Sports and Entertainment Complex site.	<input type="checkbox"/>
DG-8.1.2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Required loading spaces provided in subterranean structure in an area that can be readily driven upon or provides reasonable access to the loading spaces.	<input type="checkbox"/>
DG-8.1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required loading spaces do not encroach into any public right-of-way or otherwise obstruct any on-site drive aisle or parking space.	<input type="checkbox"/>
8.2 Loading Space Design					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-8.2.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Loading spaces required for Event Center Structure minimum width of 10 feet and minimum length of 30 feet.	<input type="checkbox"/>
DG-8.2.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Loading spaces required for Event Center Supporting Structures minimum width of 10 feet and minimum length of 20 feet.	<input type="checkbox"/>
DG-8.2.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Any required loading space minimum height clearance of 14 feet.	<input type="checkbox"/>
DG-8.2.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Surface of any required loading space shall be paved with asphalt or concrete and complies with IMC Section 12-55.2.	<input type="checkbox"/>
DG-8.2.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Any subterranean loading facility accommodates maneuvering delivery vehicles such as trucks or tractor-trailers into and out of loading positions at the docks, stalls and driveways.	<input type="checkbox"/>
8.3 Access and Screening					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-8.3.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Access to required loading spaces provided from interior site access roads or driveways accessed from West Century Boulevard or West 102nd Street.	<input type="checkbox"/>
DG-8.3.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Required loading spaces visibly separated from public entrances and parking areas and shall be screened with a combination of walls and landscaping to minimize views of the loading area from public views and adjacent residential uses.	<input type="checkbox"/>
DG-8.3.3	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Loading areas in excess of the required loading spaces provided in loading zones along South Prairie Avenue as approved or designated by Department of Public Works.	<input type="checkbox"/>

Section 9 Sustainability and Environmental Sensitivity					
9.1 Green Buildings					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-9.1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Event Center Structure and the Event Center Supporting Structures designed to meet the requirements for LEED Gold certification for new construction.	<input type="checkbox"/>
DG-9.1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Project design features enable the Arena to exceed the building energy efficiency standards set forth in Part 6 of Title 24 of the California Code of Regulations.	<input type="checkbox"/>
9.2 Solar Energy Generation					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-9.2.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Electrical supply strategy that incorporates a solar energy generation system and battery energy storage.	<input type="checkbox"/>
DG-9.2.2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Solar photovoltaic panels incorporated into the design of any structure.	<input type="checkbox"/>
9.3 Recycling					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-9.3.1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Features and space to support implementation of a comprehensive waste reduction and diversion program.	<input type="checkbox"/>
9.4 Alternative Transportation					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-9.4.1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Circulation or access features or spaces to accommodate the use of rail transit by employees and attendees of events hosted at the Arena such as a shuttle service pick-up and drop-off area or pedestrian connections to nearby stations	<input type="checkbox"/>
DG-9.4.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Circulation and parking facilities to accommodate local microtransit service and park-n-ride service for employees and attendees of events hosted at the Arena.	<input type="checkbox"/>
DG-9.4.3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Facilities to support active transportation modes, such as bicycle parking, bicycle repair stations, and locker room and shower facilities for employees.	<input type="checkbox"/>

Section 9 Sustainability and Environmental Sensitivity					
9.5 Parking Facilities					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-9.5.1				Any public parking facility includes a vehicle circulation and parking availability system or features to help reduce vehicle circulation and idling time within the parking facility.	<input type="checkbox"/>
DG-9.5.2				Any public parking facility includes preferential parking for carpool vehicles.	<input type="checkbox"/>
9.6 Electric Vehicle Charging					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-9.6.1				8% of required parking spaces for private automobile parking equipped with electric vehicle supply equipment (EVSE).	<input type="checkbox"/>
DG-9.6.2				Truck loading spaces or docks within the Event Center equipped with EVSE.	<input type="checkbox"/>
DG-9.6.3				Parking and loading spaces with EVSE clearly identified and provide adequate access.	<input type="checkbox"/>
DG-9.6.4				EVSE meet the following requirements: <ul style="list-style-type: none"> <li>• Provide Level II charging capacity (208 – 240 volts) or greater.</li> <li>• Comply with the relevant regional or local standard for electrical connectors.</li> <li>• Networked or internet addressable and capable of participating in a demand-response program or time-of-use pricing.</li> </ul>	<input type="checkbox"/>

Section 9 Sustainability and Environmental Sensitivity					
9.7 Water and Stormwater					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-9.7.1				Outdoor water use reduced through best management practices.	<input type="checkbox"/>
DG-9.7.2				Indoor water usage reduced through installation of efficient flush and flow fixtures or similarly effective strategies or measures.	<input type="checkbox"/>
DG-9.7.3				Site design complies with all applicable Regional Water Quality Control Board and County of Los Angeles regulations for water quality and quantity including preparation of a LID Plan.	<input type="checkbox"/>
DG-9.7.4				<p>Site design employs LID strategies to minimize impervious areas through site design features, which may include but are not limited to:</p> <ul style="list-style-type: none"> <li>Bio-filtration and stormwater planters designed to capture site runoff from roof drains and/or surface flow, treat the runoff through biological reactions within the planter soil media, and discharge at a rate intended to mimic pre-developed conditions.</li> <li>Site specific BMPs designed and sized to properly manage the storm runoff prior to discharging from the site and into public storm drain lines.</li> </ul>	<input type="checkbox"/>
9.8 Bird Collision Deterrence					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-9.8.1				Exterior façade materials should be designed to achieve a maximum threat factor of 25 in accordance with the American Bird Conservancy Bird Collision Material Threat Factor Reference Standard.	<input type="checkbox"/>
DG-9.8.2				All externally visible transparent glass panels or façade surfaces should be designed with treatments to reduce bird collisions, such as fritting or similar patterns, etching, stained or frosted glass, or UV reflective or absorbing patterns, or similar treatments.	<input type="checkbox"/>

Appendix A: SEC Design Guidelines Checklist

Section 10 Design Considerations for Specific Uses					
10.1 Sale, Service, or Consumption of Alcoholic Beverages					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-10.1.1				Areas in which alcoholic beverages are sold, served, or consumed lighted and arranged to allow for observation of all such areas by supervisor or security personnel.	<input type="checkbox"/>
DG-10.1.2				Areas for the permitted sale, service, or consumption of alcoholic beverages defined by clearly visible physical features, boundary indications, and/or signage.	<input type="checkbox"/>
DG-10.1.3				A sign stating "We ID everyone under 30 years of age for alcohol sales" shall be displayed at or near the point of sale of any alcoholic beverages in a manner easily readable by a patron purchasing an alcoholic beverage.	<input type="checkbox"/>
DG-10.1.4				A kitchen or food menu not a requirement for the sales or service of alcoholic beverages by any establishment or operator.	<input type="checkbox"/>
DG-10.1.5				Establishments serving alcoholic beverages include a bar or lounge area separate from the main food service area of the establishment.	<input type="checkbox"/>
DG-10.1.6				Recommendations of the Los Angeles County Fire Department relative to fire safety incorporated for areas in which alcohol may be sold, served, or consumed.	<input type="checkbox"/>
DG-10.1.7				Recommendations of the Inglewood Police Department regarding security measures for the protection of visitors and employees appropriate to the design of the site incorporated for areas in which alcohol may be sold, served, or consumed.	<input type="checkbox"/>
10.2 Outdoor Restaurants or Dining Areas					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-10.2.1				Outdoor dining areas or spaces separated from parking lots, driveways and public sidewalks by location, temporary or permanent screening features, and/or landscaping.	<input type="checkbox"/>
DG-10.2.2				Exterior lighting not directed onto any adjacent residential property.	<input type="checkbox"/>
DG-10.2.3				Perimeter of any outdoor dining area where alcoholic beverages are served or consumed defined by temporary or permanent physical barriers that form defined points of access to such area.	<input type="checkbox"/>

Section 10 Design Considerations for Specific Uses					
10.3 Communications Facilities					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-10.3.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Communications facilities, antennas, or related equipment not located in parking or loading spaces, vehicular or pedestrian circulation areas, or open space areas such that it would interfere or impair the intended function or utility of such area.	<input type="checkbox"/>
DG-10.3.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Communications facilities and related equipment integrated into a structure, architectural feature of a building, or public art or other element, or otherwise screened from public view in a manner that is compatible with the overall design.	<input type="checkbox"/>
DG-10.3.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Exterior finishes of communications facilities and related equipment are non-reflective and blend with the materials and colors of surrounding buildings, structures, and/or landscaping.	<input type="checkbox"/>
DG-10.3.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Any permanently-installed communications facilities, antennas or related equipment do not exceed the height limits established in Section 2.	<input type="checkbox"/>
10.4 Public Art					
Reference	Required	Encouraged	Allowed	SEC Design Guideline	Included
DG-10.4.1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Public art provided within the Sports and Entertainment Complex to meet the requirements of IMC Article 14 of Chapter 11 in areas that are publicly viewable or publicly accessible and do not require not require a fee for admission (such as ticketed events) as follows: <ul style="list-style-type: none"> <li>Attached to, applied or erected on, suspended from, or integrated into any structure;</li> <li>Within any Primary Landscape Area;</li> <li>Within any Secondary Landscape Area;</li> <li>Any other publicly viewable or publicly accessible location identified in a development agreement between the developer of the Sports and Entertainment Complex and the City.</li> </ul>	<input type="checkbox"/>
DG-10.4.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Public art located to maintain adequate vehicular and pedestrian access and circulation areas.	<input type="checkbox"/>
DG-10.4.3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The location of public art allows for viewing from a variety of vantage points.	<input type="checkbox"/>

City Council Staff Report

Attachment 15:

Draft Development Agreement Ordinance





1           **WHEREAS**, pursuant to the Development Agreement Statute, the  
2 Project Sponsor seeks to enter into a development agreement with the City for  
3 purposes of developing the Project, substantially in the form attached to this  
4 Ordinance as Exhibit B (the Development Agreement).

5           **WHEREAS**, Project Sponsor has entered into a binding legal contract for  
6 the acquisition of the parcel identified in the proposed Development Agreement  
7 as PPP Parcel 2.

8           **WHEREAS**, to strengthen the public planning process, encourage private  
9 participation in comprehensive planning and reduce the economic risk of  
10 development, the Legislature authorizes municipalities, in their discretion, to  
11 establish certain development rights in real property for a period of years  
12 regardless of intervening changes in land use regulations.

13           **WHEREAS**, the proposed Development Agreement was set for a duly-  
14 noticed public hearing before the Planning Commission in the City Council  
15 Chambers, Ninth Floor, of the Inglewood City Hall, on the 17th day of June  
16 2020, beginning at the hour of 7:00 p.m.

17           **WHEREAS**, on June 17, 2020, the Planning Commission conducted the  
18 hearing at the time and place stated above and afforded all persons interested  
19 in the matter of the Development Agreement or in any matter or subject related  
20 thereto, an opportunity to be heard by the Planning Commission and to submit  
21 any testimony or evidence in favor of or against the proposed Development  
22 Agreement.

23           **WHEREAS**, pursuant to the California Environmental Quality Act,  
24 Public Resources Code, Section 21000, et seq. (CEQA), including without  
25 limitation Section 21168.6.8, the City prepared an Environmental Impact  
26 Report (EIR) (State Clearinghouse No. 2018021056) for the Project, including  
27 the proposed Development Agreement, which analyzed environmental impacts  
28 of the proposed Project. Prior to making a recommendation on the Project

1 (including the proposed Development Agreement), the Planning Commission  
2 reviewed and considered the EIR and recommended that the City Council  
3 certify the EIR, make certain environmental findings and adopt a Statement of  
4 Overriding Considerations for significant and unavoidable impacts of the  
5 Project that would remain even with the implementation of necessary  
6 mitigation measures (together, the CEQA Findings), and adopt a Mitigation  
7 Monitoring and Reporting Program (MMRP) for the Project.

8 **WHEREAS**, the Planning Commission considered the Development  
9 Agreement and testimony and information received at the public hearing  
10 relating to the Project, including without limitation the oral and written reports  
11 from City staff, oral reports from City consultants, and the EIR. After taking  
12 public testimony and fully considering all the issues, the Planning Commission  
13 determined that the proposed Development Agreement should be recommended  
14 for approval to the City Council.

15 **WHEREAS**, on June 17, 2020, the Planning Commission approved  
16 Resolution No. 1873 entitled:

17  
18 **A RESOLUTION OF THE PLANNING COMMISSION OF THE**  
19 **CITY OF INGLEWOOD, CALIFORNIA, RECOMMENDING TO**  
20 **THE CITY COUNCIL THAT A DEVELOPMENT AGREEMENT**  
21 **BY AND BETWEEN THE CITY OF INGLEWOOD AND**  
22 **MURPHY'S BOWL, LLC, CONCERNING THE INGLEWOOD**  
23 **BASKETBALL AND ENTERTAINMENT CENTER (IBEC) BE**  
24 **APPROVED**

25 **WHEREAS**, the matter of the proposed Development Agreement was  
26 presented to the City Council on July 7, 2020, who then scheduled a public  
27 hearing for July 21, 2020; and,

28 **WHEREAS**, notice of the time and place of the hearing was given as  
required by law; and,

1           **WHEREAS**, the City Council conducted the public hearing at the time and  
2 place stated above and afforded all persons interested in the matter of the  
3 Development Agreement, or any matter or subject related thereto, an opportunity  
4 to be heard by the City Council and to submit any testimony or evidence in favor of  
5 or against the Development Agreement.

6 **SECTION 1.**

7           The City Council has carefully considered all testimony and evidence  
8 presented in this matter, and being advised finds as follows:

9           Based on the entirety of the materials before the City Council, including  
10 without limitation, agenda reports to the City Council and the Planning  
11 Commission; Planning Commission Resolution No. 1873; the EIR and all  
12 appendices thereto and supporting information; Resolution No. \_\_\_\_\_ (EIR  
13 Certification Resolution) including the CEQA Findings and Statement of  
14 Overriding Considerations and MMRP attached as Exhibits B and C thereto; all  
15 plans, drawings, and other materials submitted by the Project Sponsor;  
16 minutes, reports, and public testimony and evidence submitted as part of the  
17 Planning Commission's and City Council's duly-noticed meetings regarding the  
18 IBEC Project; the record of proceedings prepared in connection with the  
19 requirements of AB 987 pursuant to Public Resources Code section 21168.6.8;  
20 and all other information contained in the City's administrative record  
21 concerning the Project (collectively, the Record), which it has carefully reviewed  
22 and considered, the City Council finds as follows:

23           1.     The foregoing Recitals are true and correct and made a part of this  
24 Ordinance.

25           2.     All procedural requirements for the City Council to approve the  
26 Development Agreement have been followed.

27           3.     The Development Agreement substantially complies with  
28 applicable requirements of the Development Agreement Statute, including

1 without limitation by virtue of the Project Sponsor holding a legal or equitable  
2 interest in PPP Parcel 2 as a result of the Project Sponsor's entry into a binding  
3 legal contract for the acquisition of such property, as well as the additional legal  
4 and equitable interests in the real property further described in the  
5 Development Agreement, including without limitation Section 4 thereof.

6 4. The Development Agreement is consistent with the General Plan,  
7 the Industrial land use designation, and the Inglewood International Business  
8 Park Specific Plan (IIBP Specific Plan), as amended, and the Project and the  
9 approvals required for implementation of the Project, are, on balance, consistent  
10 with the General Plan and IIBP Specific Plan, as both are amended, as  
11 described in Exhibit D (General Plan Consistency Analysis) to City Council  
12 Resolution No. \_\_\_\_\_ (General Plan Amendment Resolution), which is  
13 incorporated by reference as though fully set forth herein.

14 5. The Development Agreement satisfies the requirements of Section  
15 65865.2, including by specifying the duration of the agreement, the permitted  
16 uses of the property, the intensity of use, the maximum height and size of  
17 proposed buildings, and provisions for reservation or dedication of land for  
18 public purposes. The Development Agreement will thereby help ensure the  
19 efficient and orderly development of the Project. The adoption of the  
20 Development Agreement is reasonably related to protection of the public health,  
21 safety, and welfare, as further described in the City Council Agenda Report and  
22 City Council Resolution No. \_\_\_\_\_ (EIR Certification Resolution), which  
23 includes a Statement of Overriding Considerations.

24 6. The Development Agreement provides substantial public benefits  
25 to the City, and to persons residing or owning property outside the boundary of  
26 the Property beyond the exactions for public benefits required in the normal  
27 development review process under federal, state or local law, as described in the  
28 Development Agreement and summarized in the Record.

1           7.     An EIR has been prepared for the IBEC Project, including the  
2 proposed Development Agreement. Prior to final approval of the Development  
3 Agreement, the City Council certified the EIR and adopted CEQA Findings  
4 including a Statement of Overriding Considerations for significant and unavoidable  
5 impacts of the Project that would remain significant even with the implementation  
6 of all feasible mitigation measures specified in the EIR, and adopted an MMRP for  
7 the Project in accordance with CEQA as provided in City Council Resolution No.  
8 \_\_\_\_\_ (EIR Certification Resolution).

9 **SECTION 2.**

10           **NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF**  
11 **INGLEWOOD, CALIFORNIA, DOES HEREBY ORDAIN AS FOLLOWS:**

12           Pursuant to the foregoing recitations and findings, the City Council of the  
13 City of Inglewood, California, hereby approves DA-2020-001 as set forth in  
14 Exhibit “B” attached hereto.

15           The City Council does hereby authorize and instruct the Mayor to  
16 execute the Development Agreement, attached hereto as Exhibit “B”, on behalf  
17 of the City of Inglewood.

18           The City Clerk shall certify to the passage and adoption of this ordinance  
19 and to its approval by the City Council and shall cause the same to be published  
20 in accordance with the City Charter and thirty days from the final passage and  
21 adoption, this ordinance shall be in full force and effect.

22 ///

23 ///

24 ///

25 ///

26 ///

27

28

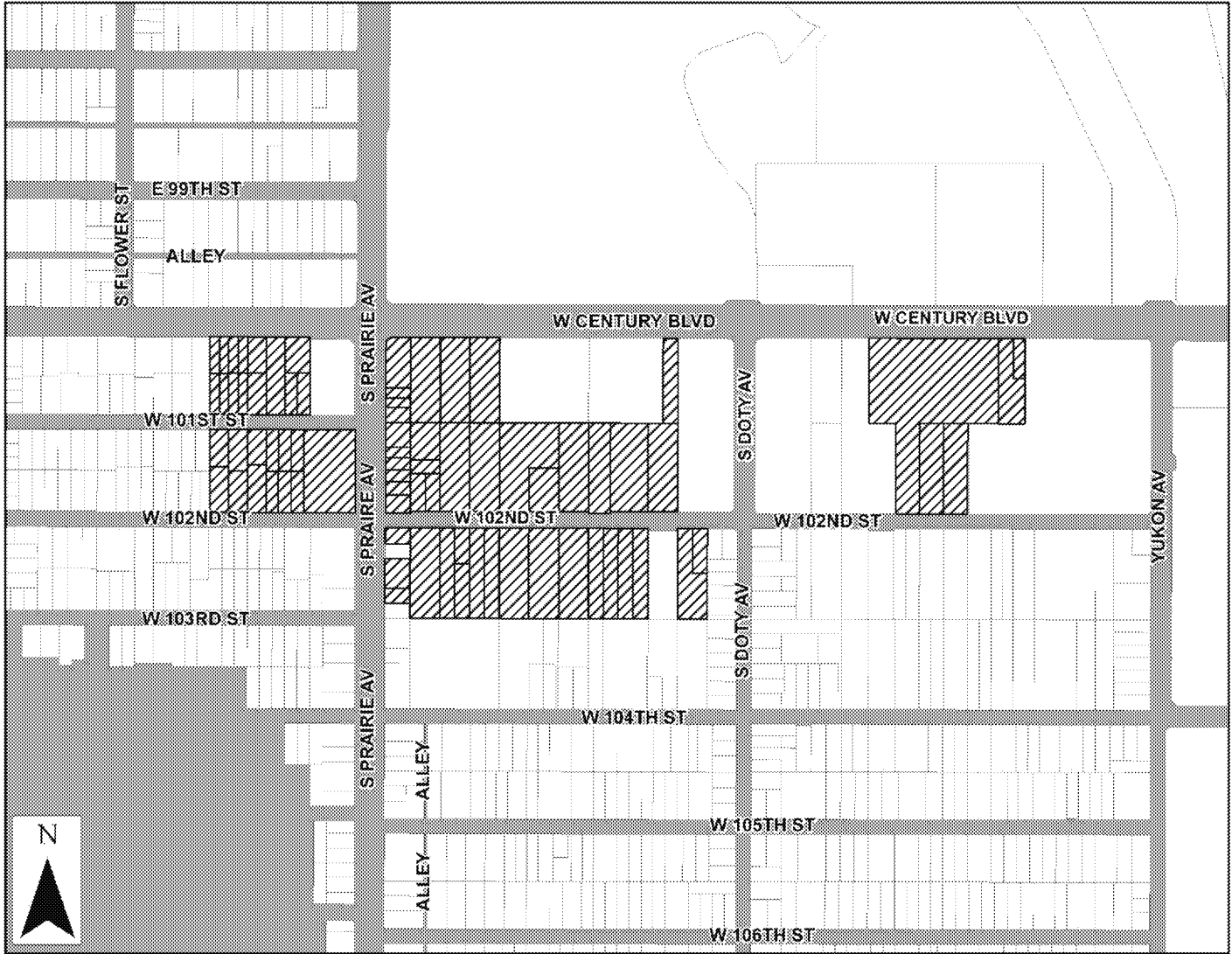
1 This ordinance was introduced by the City Council on the 21<sup>st</sup> day of July  
2 2020 and is passed, approved and adopted by the City Council of the City of  
3 Inglewood this \_\_\_\_ day of July 2020.

4  
5  
6  
7 \_\_\_\_\_  
8 **JAMES T. BUTTS**  
9 **MAYOR OF THE CITY OF**  
10 **INGLEWOOD, CALIFORNIA**

11  
12 **Attest:**

13  
14  
15 \_\_\_\_\_  
16 **YVONNE HORTON**  
17 **CITY CLERK**  
18 **(SEAL)**

DA Ordinance  
Exhibit A:  
IBEC Area Map





DA Ordinance  
Exhibit B:  
Development Agreement

EXECUTION COPY

OFFICIAL BUSINESS

Document entitled to Free recording  
Government Code Section 6103

RECORDING REQUIRED BY  
AND WHEN RECORDED MAIL TO:

City of Inglewood  
One Manchester Blvd.  
Inglewood, CA 90301  
Attn: City Clerk

(SPACE ABOVE THIS LINE RESERVED FOR  
RECORDER'S USE)

**DEVELOPMENT AGREEMENT BY AND BETWEEN**

**THE CITY OF INGLEWOOD,**

**AND**

**MURPHY'S BOWL LLC**

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## DEVELOPMENT AGREEMENT

This Development Agreement (this "**Agreement**") is entered into as of this \_\_\_ day of \_\_\_\_\_, by and between the CITY OF INGLEWOOD, a municipal corporation ("**City**"), and MURPHY'S BOWL LLC, a Delaware limited liability company ("**Developer**"). City and Developer and their respective Transferees and assigns are hereinafter collectively referred to as the "**Parties**" and singularly as "**Party**."

### RECITALS

**A. Authorization.** To strengthen the public planning process, encourage private participation in comprehensive planning and reduce the economic risk of development, the Legislature of the State of California adopted Government Code Section 65864 *et seq.* (the "**Development Agreement Statute**"), which authorizes City and any person having a legal or equitable interest in real property to enter into a development agreement, establishing certain development rights in the property which is the subject of the development project application. The purpose of the Development Agreement Statute is to authorize municipalities, in their discretion, to establish certain development rights for a period of years regardless of intervening changes in land use regulations.

**B. Developer.** Developer is a limited liability company formed and in good standing under the laws of the State of Delaware and is qualified to do business in the State of California.

**C. Project.** The Developer, in cooperation with the City, proposes to develop on the Property, as defined below, a Sports and Entertainment Complex with an arena, providing access to recreation to the public in the form of spectator sports, that has up to approximately 18,000 fixed seats suitable for National Basketball Association ("NBA") games, with capacity to add approximately 500 additional temporary seats for additional sports, entertainment or other events, as well as ancillary and incidental arena uses which is expected to include: (1) up to an approximately 85,000 square-foot team practice and athletic training facility; (2) up to approximately 71,000 square feet of LA Clippers team office space; (3) up to an approximately 25,000 square-foot sports medical clinic for team and potential general public use; (4) an outdoor plaza adjacent to the Arena with circulation and gathering space and landscaping along with an outdoor stage and basketball court (collectively, the "**Plaza**"); (5) up to approximately 63,000 square feet of retail, food and beverage, back of house services, security, storage, bag check, rest rooms, and other uses adjacent to the Plaza; (6) parking facilities in three parking structures with parking spaces for vehicles and bicycles; (7) a transportation hub dedicated to bus, coach, and Transportation Network Company staging; (8) one or two pedestrian bridges across adjacent rights-of-way; (9) various signage, broadcast, filming, recording, transmission, production, and communications facilities and equipment; and (10) other associated public improvements (collectively, and as modified in accordance with this Agreement, the "**Project**"). The Project is also expected to include a limited service hotel. The Project includes implementation of a Transportation Demand Management Program with shuttle bus service connecting the Property to nearby Metro stations, including pick-up and drop-off locations along South Prairie Avenue, and other trip reduction measures as fully described in the MMRP and in this Agreement. The Project would also be designed to meet or exceed standards for LEED Gold certification.

**D. Property.** The Project is to be developed on those certain parcels of real property referred to in this Agreement as the "**Property**" and generally depicted in Exhibit A attached hereto. Together, the Property is comprised of the "**City Parcels**" more particularly identified and legally described in Exhibit A-1 and the "**Potential Participating Parcels**" more particularly identified and legally described in Exhibit A-2. Developer has entered into a contract for the acquisition of one of the Potential Participating Parcels, identified as Parcel 2 in Exhibit A-2 (individually, "**PPP Parcel 2**"); pursuant to which a memorandum of such contract has been recorded in the Official Records of the County of Los Angeles, State of California. In conjunction with entering into this Agreement, the Parties contemplate entering into a Disposition and Development Agreement (the "**DDA**"), providing for, among other things, the Developer's purchase from City of the City Parcels and, if acquired by the City, the remaining Potential Participating Parcels.

**E. Planning Commission Public Hearing.** On June 17, 2020, at a duly noticed public hearing, the Planning Commission of the City of Inglewood, serving as the City's planning agency for purposes of development agreement review pursuant to Government Code Section 65867, considered this Agreement and thereafter, pursuant to Resolution No. \_\_\_\_\_, recommended that the City Council approve this Agreement.

**F. Environmental Review.** On \_\_\_\_\_, 2020, at a duly noticed public hearing, the City Council of the City of Inglewood, serving as the lead agency for purposes of CEQA, reviewed and considered the Inglewood Basketball and Entertainment Center Environmental Impact Report for the Project (the "**FEIR**") and the Planning Commission's recommendations related thereto. Thereafter, the City Council certified the FEIR as adequate and complete and made findings in connection therewith pursuant to Resolution No. \_\_\_\_\_.

**G. Project Approvals.** The approvals set forth in Exhibit B (the "**Project Approvals**") are necessary for the development, use, and operation of the Project, and such Project Approvals have been granted and are the subject of this Agreement.

**H. Agreement Consistent with the General Plan and Applicable Specific Plans.** Having duly examined and considered this Agreement and having properly noticed and held public hearings hereon, the City Council has found that this Agreement is consistent with the General Plan, as amended by the Project Approvals, and the International Business Park Specific Plan, as amended under the Project Approvals. As a result, this Agreement complies with the Government Code Section 65867.5 requirement of general plan and specific plan consistency.

**I. City Determination.** This Agreement is voluntarily entered into by the Parties in consideration of the benefits to and the rights created in favor of each of the Parties and in reliance upon the various representations and warranties contained herein. As such, City has determined that the Project is a development for which a development agreement is appropriate. A development agreement will secure the appropriate commitments for the benefit of the public and eliminate uncertainty in City's land use planning and permitting process and assure that Developer may plan to develop, use, and operate the Property with certainty as to the installation of necessary improvements appropriate to the Project, and otherwise achieve the goals and purposes for which the Development Agreement Statute was enacted. In order to enable Developer to expend the necessary sums to prepare the plans referred to in this Agreement and to

pursue other development work associated with the Project, both Developer and City desire to provide certainty through this Agreement with respect to the specific development, use, and operational criteria applicable to the Property in order to provide for appropriate utilization of the Property in accordance with sound planning principles.

**J. Public Use Determination.** The City Council has determined that the development of the Project, at no cost to the City, which provides access to recreation to the residents of the City of Inglewood in the form of spectator sports, is a proper public use which is consistent with the City's charter and its municipal functions (the "**Public Use**").

**K. Public Benefits Provided Pursuant to the Development Agreement.** In addition to the Public Use aspect of the Project, the City Council has also determined that the development of the Project will afford the City and its residents with numerous public benefits, including those identified in Section 14 and more particularly described in Exhibit C (the "**Public Benefits**"), which are in excess of those otherwise having a "nexus" to the Project and beyond the public benefits which could be expected from the Project in absence of the Agreement. In exchange for the Public Benefits to the City, Developer desires to receive assurances that the City will grant permits and approvals required for the development, use, and operation of the Project, over the term of this Agreement, in accordance with procedures provided by Applicable Law and in this Agreement, and that Developer may proceed with the development, use, and operation of the Project in accordance with the Existing City Laws consistent with the terms and conditions of this Agreement. In order to effectuate these purposes, the Parties desire to enter into this Agreement.

**L. City Council Action.** On \_\_\_\_\_, 2020, the City Council held a duly noticed public hearing on this Agreement and, after independent review and consideration, including the Planning Commission's recommendations related thereto, approved this Agreement pursuant to Ordinance No. \_\_\_\_\_ (the "**Enacting Ordinance**"), making the same findings and determinations as those made by the Planning Commission through its own independent conclusion and this Agreement.

NOW, THEREFORE, in consideration of the following mutual promises, conditions, and covenants, the Parties agree as follows:

### **AGREEMENT**

1. **INCORPORATION OF RECITALS AND EXHIBITS.** The Preamble, the Recitals and all defined terms set forth in both are incorporated into this Agreement as if set forth herein in full. In addition, each of the exhibits attached hereto are expressly incorporated herein and made a part of this Agreement, and all references to this Agreement shall include the exhibits hereto.

2. **DEFINITIONS.** Each reference in this Agreement to any of the following terms shall have the meaning set forth below for each such term. Certain other terms shall have the meaning set forth for such term in this Agreement if not otherwise defined below.

2.1 **Adoption Date.** The date the City Council adopted the Enacting Ordinance.

2.2 **Affiliate.** As to an individual, corporation, association, partnership (general or limited), joint venture, trust, estate, limited liability company or other legal entity or organization (each, a "**Person**"), any other Person that directly or indirectly controls, is controlled by, or is under common control with, such Person. As to the definition of Affiliate, "**control**" shall mean, directly or indirectly, and either individually or in concert with any Immediate Family Members, (a) the ownership of more than 50% of the voting securities or other voting interests of any Person, or (b) the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of such Person, whether through ownership of voting securities, by contract or otherwise; and "**Immediate Family Members**" shall mean, and be limited to, with respect to any individual, (a) such natural person's then-current spouse, children, grandchildren, and other lineal descendants of such natural person, (b) any trust or estate of which the primary beneficiaries include such natural person and/or one or more of the persons described in the foregoing clause (iv)(a), or (c) any corporation, partnership, limited liability company or other entity that is 100% owned by one or more of the Persons described in the foregoing clauses (iv)(a) and (iv)(b).

2.3 **Agreement.** Defined in the Preamble.

2.4 **Annual Review Date.** Defined in Section 19.1.

2.5 **Applicable Exactions.** Defined in Section 7.2.

2.6 **Applicable Law.** Collectively, (i) Existing City Laws, (ii) Subsequent Rules only if applicable to the development, use, or operation of the Project pursuant to Section 8 of this Agreement, and (iii) the laws of the State of California, the Constitution of the United States, and any codes, statutes, or mandates in any court decision, state or federal, thereunder.

2.7 **Approvals.** All amendments to City Laws and any and all permits or approvals (including conditions of approval imposed in connection therewith) of any kind or character granted or issued under the City Laws to confer the lawful right on Developer to develop, use, and operate the Project in accordance with this Agreement, including, but not limited to, the Project Approvals, any Subsequent Approvals, and other permits and approvals that are applicable to the Project in accordance with this Agreement.

2.8 **Approved Event Configurations.** Defined in Section 9.1.

2.9 **Arena.** A state-of-the-art basketball arena which has up to approximately 18,000 fixed seats suitable for NBA games, with capacity to add approximately 500 additional temporary seats for additional sports, entertainment or other events, and includes ancillary and incidental uses and spaces within the arena structure, such as restaurant food service, retail, and concourse areas.

2.10 **CEQA.** The California Environmental Quality Act (Public Resources Code §§ 21000 *et seq.* and the Guidelines thereunder (Title 14, Cal. Code Regs. § 15000 *et seq.*).

2.11 **Certificate of Occupancy.** The final certificate of occupancy issued by the City for the Project or any applicable portion thereof.

2.12 **City.** Defined in the Preamble.

2.13 **City Fiscal Year.** The twelve month period commencing October 1 of any calendar year through and including September 30 of the next calendar year.

2.14 **City Law(s).** The ordinances, resolutions, codes, rules, regulations, and official policies of the City, governing the permitted uses, density, parking requirements, design, operations, improvement and construction standards and specifications applicable to the development, use, or operation of the Property or the Public Improvements. Specifically, but without limiting the generality of the foregoing, City Laws shall include the City's General Plan, Municipal Code, zoning ordinance, and subdivision regulations, as well as taxes related to ticket sales, gross receipts, and parking.

2.15 **City Manager.** The City Manager of Inglewood or his or her designee.

2.16 **City Parcels.** Defined in Recital D.

2.17 **City-Wide Laws.** Any City Laws generally applicable to a category of development, use, or operation of one or more kinds, wherever the same may be located in City, including but not limited to, a general or special tax adopted in accordance with California Constitution, Art. XIII C and D *et seq.*, otherwise known as Proposition 218; provided, however, that notwithstanding the foregoing, any ordinances, resolutions, codes, rules, regulations, taxes and official policies of City which only apply to, meaningfully impact, or uniquely and disproportionately impact the Project (whether explicitly, or as a practical matter) shall not be considered City-Wide Laws. For the purposes hereof, "**City-Wide Laws**" includes the variant "**City-Wide.**"

2.18 **Claims.** Defined in Section 20.1.

2.19 **Codes.** Defined in Section 7.4.

2.20 **Commercial Sign.** Defined in Section 17.

2.21 **Complaining Party.** Defined in Section 24.

2.22 **DDA.** Defined in Recital D.

2.23 **Default.** Either an Event of City Default or an Event of Developer Default (as applicable).

2.24 **Development Agreement Statute.** Defined in Recital A.

2.25 **Effective Date.** The last to occur of (i) the date the Enacting Ordinance (as defined below) takes effect pursuant to Government Code § 36937; (ii) the date the Enacting Ordinance or other Project Approval(s), is (are) upheld in the event of a valid referendum proceeding is filed pursuant to Elections Code § 9235, *et seq.*; or (iii) the date the City and Developer enter into a DDA as described in Recital D.

2.26 **Enacting Ordinance.** The ordinance pursuant to which the City approved this Agreement as defined in Recital L.

2.27 **Environmental Law.** Any federal, state or local law, ordinance, rule, or regulation, now or hereafter enacted, amended or modified, in each case to the extent applicable to the Property including the Comprehensive Environmental Response, Compensation, and Liability Act (42 U.S.C. Section 9601 *et seq.*); the Hazardous Materials Transportation Act (49 U.S.C. Section 1801 *et seq.*); the Resource Conservation and Recovery Act (42 U.S.C. Section 6901 *et seq.*); Sections 25117, 25281, 25316 or 25501 of the California Health & Safety Code; any so-called "Superfund" or "Superlien" law; the Toxic Substance Control Act of 1976 (15 U.S.C. Section 2601 *et seq.*); the Clean Water Act (33 U.S.C. Section 1251 *et seq.*); and the Clean Air Act (42 U.S.C. Section 7901 *et seq.*).

2.28 **Event of City Default.** Defined in Section 22.2.

2.29 **Event of Developer Default.** Defined in Section 22.1.

2.30 **Exactions.** All exactions, costs, fees, in-lieu fees or payments, charges, taxes, assessments, dedications, or other monetary or non-monetary requirement charged or imposed by City, or by City through an assessment district (or similar entity), in connection with the development of, construction on, operation or use of real property, including but not limited to transportation improvement fees, park fees, parking taxes, admissions taxes, child care in-lieu fees, art fees, affordable housing fees, infrastructure fees, dedication or reservation requirements, facility fees, sewer fees, water connection fees, obligations for on- or off-site improvements, or other conditions for approval called for in connection with the development, construction, or operation of the Project, whether such exactions constitute public improvements, Mitigation Measures, or taxes or impositions made under applicable City Laws or in order to make an Approval consistent with applicable City Laws. Exactions shall not include Processing Fees, such as building permit fees and plan check fees, Transient Occupancy Tax (IMC § 9-8 or as modified), Sewer Connection Fees (IMC § 10-91 or as modified), and Sewer Service Fees (IMC § 10-155 or as modified).

2.31 **Existing City Laws.** The City Laws in effect as of the Adoption Date, as amended by any amendments to City Laws enacted by the Project Approvals.

2.32 **FEIR.** Defined in Recital F.

2.33 **Final Determination.** A final, non-appealable resolution of any legal challenge or appeal.

2.34 **General Plan.** The General Plan for City, adopted by the City Council in January 1980, and subsequently amended, and in effect as of the Adoption Date, as amended by any applicable amendments to City Laws enacted by the Project Approvals.

2.35 **Hazardous Materials.** Any substance, material, or waste which is or becomes regulated by any local governmental authority, the State of California and/or the United States Government, including, but not limited to asbestos; polychlorinated biphenyls (whether or not highly chlorinated); radon gas; radioactive materials; explosives; chemicals known to cause

cancer or reproductive toxicity; hazardous waste, toxic substances or related materials; petroleum and petroleum product, including, but not limited to, gasoline and diesel fuel; those substances defined as a "Hazardous Substance", as defined by Section 9601 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. 9601, *et seq.*, or as "Hazardous Waste" as defined by Section 6903 of the Resource Conservation and Recovery Act, 42 U.S.C. 6901, *et seq.*; an "Extremely Hazardous Waste," a "Hazardous Waste" or a "Restricted Hazardous Waste," as defined by The Hazardous Waste Control Law under Section 25115, 25117 or 25122.7 of the California Health and Safety Code, or is listed or identified pursuant to Section 25140 of the California Health and Safety Code; a "Hazardous Material", "Hazardous Substance," "Hazardous Waste" or "Toxic Air Contaminant" as defined by the California Hazardous Substance Account Act, laws pertaining to the underground storage of hazardous substances, hazardous materials release response plans, or the California Clean Air Act under Sections 25316, 25281, 25501, 25501.1 or 39655 of the California Health and Safety Code; "Oil" or a "Hazardous Substance" listed or identified pursuant to the Federal Water Pollution Control Act, 33 U.S.C. 1321; a "Hazardous Waste," "Extremely Hazardous Waste" or an "Acutely Hazardous Waste" listed or defined pursuant to Chapter 11 of Title 22 of the California Code of Regulations Sections 66261.1 through 66261.126; chemicals listed by the State of California under Proposition 65 Safe Drinking Water and Toxic Enforcement Act of 1986 as a chemical known by the State to cause cancer or reproductive toxicity pursuant to Section 25249.8 of the California Health and Safety Code; a material which due to its characteristics or interaction with one or more other substances, chemical compounds, or mixtures, materially damages or threatens to materially damage, health, safety, or the environment, or is required by any law or public agency to be remediated, including remediation which such law or government agency requires in order for the Property to be put to the purpose proposed by this Agreement; any material whose presence would require remediation pursuant to the guidelines set forth in the State of California Leaking Underground Fuel Tank Field Manual, whether or not the presence of such material resulted from a leaking underground fuel tank; pesticides regulated under the Federal Insecticide, Fungicide and Rodenticide Act, 7 U.S.C. 136 *et seq.*; asbestos, PCBs, and other substances regulated under the Toxic Substances Control Act, 15 U.S.C. 2601 *et seq.*; any radioactive material including, without limitation, any "source material," "special nuclear material," "by-product material," "low-level wastes," "high-level radioactive waste," "spent nuclear fuel" or "transuranic waste" and any other radioactive materials or radioactive wastes, however produced, regulated under the Atomic Energy Act, 42 U.S.C. 2011 *et seq.*, the Nuclear Waste Policy Act, 42 U.S.C. 10101 *et seq.*, or pursuant to the California Radiation Control Law, California Health and Safety Code, Sections 25800 *et seq.*; hazardous substances regulated under the Occupational Safety and Health Act, 29 U.S.C. 651 *et seq.*, or the California Occupational Safety and Health Act, California Labor Code, Sections 6300 *et seq.*; and/or regulated under the Clean Air Act, 42 U.S.C. 7401 *et seq.* or pursuant to the California Clean Air Act, Sections 3900 *et seq.* of the California Health and Safety Code.

2.36 **Indemnification Claim.** Defined in Section 20.2.1.

2.37 **Indemnified Parties.** Defined in Section 20.1.

2.38 **Developer.** Defined in the Preamble.

2.39 **Losses.** Defined in Section 20.1.

- 2.40 **Minor Amendment.** Defined in Section 21.4.
- 2.41 **Mitigation Measures.** The mitigation measures applicable to the Project, the implementation of which is identified in the MMRP as the responsibility of Developer.
- 2.42 **MMRP.** The Mitigation Monitoring and Reporting Plan adopted as part of the Project Approvals, as it applies to the Project.
- 2.43 **Mortgage.** A mortgage or deed of trust, or other transaction, in which the Property, or a portion thereof or an interest therein, or any improvements thereon, is conveyed or pledged as security, contracted in good faith and for fair value, or a sale and leaseback arrangement in which the Property, or a portion thereof or an interest therein, or improvements thereon, is sold and leased back concurrently therewith in good faith and for fair value.
- 2.44 **Mortgagee.** The holder of the beneficial interest under a Mortgage, or the owner of the Property, or interest therein, under a Mortgage.
- 2.45 **Party.** City and Developer, and their respective assignees or Transferees, determined as of the time in question; collectively they shall be called the "**Parties**."
- 2.46 **Party in Default.** Defined in Section 24.
- 2.47 **Performance Year.** July 1 of any calendar year through and including June 30 of the next calendar year.
- 2.48 **Permitted Delay.** Defined in Section 30.
- 2.49 **Person.** An individual, partnership, firm, association, corporation, trust, governmental agency, administrative tribunal or other form of business or legal entity.
- 2.50 **Plan Check Fees.** Defined in Section 7.2.
- 2.51 **Plaza.** The pedestrian plaza to be developed as part of the Project and operated and maintained consistent with the requirements set forth in Exhibit F.
- 2.52 **Potential Participating Parcels.** Defined in Recital D.
- 2.53 **Prevailing Party.** Defined in Section 25.
- 2.54 **Processing Fee.** A City-Wide fee payable upon the submission of an application for a permit or approval, which covers only the estimated actual costs to City of processing that application, and is not an Exaction.
- 2.55 **Project.** Defined in Recital C.
- 2.56 **Project Approvals.** Defined in Recital G.
- 2.57 **Property.** Defined in Recital D.



2.58 **Public Art Contribution.** Defined in Section 7.3.3.

2.59 **Public Benefits.** Defined in Recital K.

2.60 **Public Improvements.** The facilities to be improved and constructed by Developer, and publicly dedicated or made available for public use, as provided by the Project Approvals and the SEC Infrastructure Plan. Public Improvements consist of all off-site right-of-way improvements; all off-site utilities (such as gas, electricity, water, sewer and storm drainage); and any other on-site or off-site improvements and facilities required by the Project Approvals and this Agreement to be constructed and dedicated by the Developer in connection with the development of the Project.

2.61 **Public Use.** Defined in Recital J.

2.62 **Public Use Restriction.** Covenants, conditions or restrictions as may be recorded in furtherance of Section 1245.245 of the California Code of Civil Procedure against those certain City Parcels and Potential Participating Parcels comprising the Arena.

2.63 **SEC Design Guidelines.** The SEC Design Guidelines, as part of the Sports and Entertainment Complex Design Guidelines and Infrastructure Plan adopted by the City Council as part of the Project Approvals.

2.64 **SEC Infrastructure Plan.** The SEC Infrastructure Plan, as part of the Sports and Entertainment Complex Design Guidelines and Infrastructure Plan adopted by the City Council as part of the Project Approvals.

2.65 **Sports and Entertainment Complex.** Defined in Section 12-38.91(E) of the Inglewood Municipal Code added as part of the Project Approvals.

2.66 **Subsequent Approvals.** Defined in Section 8.4.

2.67 **Subsequent Rules.** Defined in Section 8.1.

2.68 **Substantive Amendment.** Defined in Section 21.3.

2.69 **Term.** Defined in Section 6.2.

2.70 **Termination.** The expiration of the Term of this Agreement, whether by the passage of time or by any earlier occurrence pursuant to any provision, including an uncured Default or other termination of this Agreement. For purposes hereof, "**Termination**" includes any grammatical variant thereof, including "**Terminate**," "**Terminated**," and "**Terminating**."

2.71 **Transfer.** Any sale, transfer, assignment, conveyance, gift, hypothecation, or the like of the Property or any portion thereof or any interest therein or of this Agreement; provided, however, that "**Transfer**" shall expressly exclude: (a) grants of leases, licenses or other occupancy rights for buildings or other improvements which will be part of the Project; (b) grants of easements or other similar rights granted in connection with the development or operation of the Project or Site; (c) the placement of mortgages or deeds of trust on the Property;

(d) the exercise of any remedies of any lender holding a mortgage or deed of trust on the Property; or (e) the removal of a general partner or managing member by the exercise of remedies under any form of operating or partnership agreement.

2.72 **Transferee.** Defined in Section 15.

2.73 **Transferred Property.** Defined in Section 15.

2.74 **Vested Rights.** Defined in Section 7.1.

3. **DESCRIPTION OF PROPERTY.** The Property is described and depicted in Exhibits A, A-1, and A-2 attached hereto.

4. **INTEREST OF DEVELOPER.** Developer has entered into a binding legal contract for the acquisition of PPP Parcel 2 and therefore holds a legal and equitable interest in PPP Parcel 2. The DDA provides for the conveyance of the City Parcels to Developer in accordance with the terms and conditions thereof. The DDA also provides a process pursuant to which any Potential Participating Parcels not owned or acquired by Developer may be acquired by City, including, if the City determines, in its sole and absolute discretion, to exercise its power of eminent domain for any such acquisition. This Agreement shall be binding on the Parties as of the Effective Date and shall be binding as to each portion of the Property on the date: (i) the Developer acquires fee title to the City Parcels; and (ii) the Developer acquires either fee title or any other legal or equitable interest in the Potential Participating Parcels that includes a right of possession.

5. **RELATIONSHIP OF CITY AND DEVELOPER.** Neither Party is acting as the agent of the other in any respect hereunder and each Party is an independent contracting entity with respect to the terms, covenants, and conditions contained in this Agreement. None of the terms or provisions of this Agreement shall be deemed to create a partnership between or among the Parties in the businesses of Developer, the municipal or governmental affairs of City, or otherwise, nor shall it cause them to be considered joint venturers or members of any joint enterprise. City and Developer renounce the existence of any form of joint venture or partnership between them, and nothing contained herein or in any document executed in connection herewith shall be construed as making City and Developer joint venturers or partners.

6. **EXECUTION AND TERM OF AGREEMENT.**

6.1 **Execution and Recording of Agreement.** This Agreement has been entered into as of the Effective Date. Not later than ten (10) City-business days after the Effective Date, the City shall cause this Agreement, together with a notice indicating the Adoption Date, the Enacting Ordinance number, and the Effective Date, to be recorded against the City Parcels in the Official Records of the County of Los Angeles, State of California. Within ten (10) City-business days following the acquisition of any Potential Participating Parcel by the Developer, or any such acquisition by City and transfer to Developer, the City shall cause a recordable memorandum of this Agreement to be recorded against such Potential Participating Parcel.

6.2 **Term.** The term of this Agreement shall commence on the Effective Date and extend for 50 years ("**Term**"), unless said Term is terminated, modified, or extended by the terms of this Agreement. Notwithstanding the foregoing, this Agreement shall terminate if the

DDA is not entered into or, if entered into, the DDA is terminated prior to the conveyance of the City Parcels to the Developer.

6.3 **Extension of Approvals.** Upon the granting of any Approval, the term of such Approval shall be extended automatically through the Term of this Agreement, notwithstanding any other City Law.

6.4 **Rights and Obligations Upon Expiration of the Term.** Following Termination of this Agreement, all of the rights, duties and obligations of the Parties hereunder shall terminate and be of no further force and effect, except as provided in this Section 6.4. Upon Termination of this Agreement, Developer shall continue to comply with the Public Use Restrictions and provisions of all City Laws then in effect or subsequently adopted with respect to the Property and/or the Project, except that any Termination shall not affect any right vested before the Termination of this Agreement (absent this Agreement), or other rights arising from Approvals previously granted by City for development, use, or operation of all or any portion of the Project, including, but not limited to any approved operating permits, sign permits, valid building permits, or certificates of occupancy.

## 7. **VESTED RIGHTS.**

7.1 **Permitted Uses.** Except as expressly provided in Section 8, during the Term of this Agreement the permitted uses and rules applicable to the completion of the development, use, and operation of the Property, including but not limited to (i) event permitting, (ii) event parking, (iii) parking, ticket, and gross receipts taxes, (iv) the density and intensity of use, (v) the rate, timing, and sequencing of development, (vi) the maximum height (except as limited by the Federal Aviation Administration), design and size of proposed buildings, and (vii) parking standards shall be those set forth in this Agreement, the Existing City Laws, and Project Approvals as of the Adoption Date (the "**Vested Rights**").

7.2 **Exactions.** Except as provided in this Section 7 and Section 8, including all subsections therein, City shall not impose any further or additional Exactions on the development, use, or operation of the Project, whether through the exercise of the police power, the taxing power, design review, or any other means, other than those set forth in the Project Approvals, the Mitigation Measures, and this Agreement. The Exactions applicable to the Project as of the Adoption Date are listed in Exhibit D ("**Applicable Exactions**"). The Applicable Exactions shall not be modified or renegotiated by City in connection with the granting of any amendment to the Project Approvals, or the granting of any Approval, except as specifically authorized in this Agreement. The provisions contained in this Section are intended to implement the intent of the Parties that Developer has the right to develop, use, and operate the Project pursuant to specified and known criteria and rules, and that City will receive the benefits conferred as a result of such development, use, and operation of the Project without abridging the right of City to act in accordance with its powers, duties, and obligations. To the extent that there are Exactions not listed on the Applicable Exactions that are first adopted or imposed by City after the Adoption Date, such new Exactions shall not be applicable to or imposed on the Project or the Property.

7.2.1 **Admission Tax.** Notwithstanding any future increases in the admissions tax listed under the Applicable Exactions, whether arising from increases pursuant to an amendment of Inglewood Municipal Code Section 9-6(2) or through an amendment of Inglewood Municipal Code Section 9-6(5) that (a) lowers the seating capacity threshold of venues specified therein, (b) increases the amount of the admissions tax levied on the per person admission price for each venue event, and/or (c) increases or eliminates the maximum aggregate amount of such admissions taxes payable annually to City, any such increased admissions tax payable by the Developer to City pursuant to Inglewood Municipal Code Section 9-6 shall not exceed 2.5% of the face value of each sold admission for events conducted at the Arena, including, but not limited to, tickets or similar rights of sold admission. Under no circumstances and at no time shall the admissions tax applicable to events at the Arena exceed 2.5% of the face value of sold admissions. Admissions not sold but provided on a complimentary basis shall not be subject to the admissions tax. If admissions are offered in a combined package with food and beverage, the portion of the combined charge that is allocable to food and beverage will be excluded from the calculation of the admissions tax, but shall be subject to sales tax to the extent required under Applicable Law. The allocation between admission and food and beverage for admissions tax purposes shall be reported to the City in the same manner as reported to the applicable State taxing authority for sales tax purposes.

7.2.2 **Parking Tax Amount.** If, at any time after five Performance Years have concluded from when the Developer has received the Certificate of Occupancy for the Arena, the City provides notice to Developer that the City has reasonably determined that it faces a Projected Budget Deficit (as defined below), then on or before September 1 following such City notice, and continuing for a total of four City Fiscal Years (collectively, the "Affected Fiscal Years"), the total Parking Tax payable from parking on the Project or the Property during each Affected Fiscal Year shall be no less than \$652,000 (twice the total amount projected at Project approval). If, on or before September 1 of each Affected Fiscal Year, the Developer has not paid Parking Taxes at least equal to the minimum \$652,000 Parking Tax amount, the Developer shall pay to the City, an amount equal to the difference between (i) the minimum \$652,000 Parking Tax amount and (ii) the Parking Taxes otherwise payable during such Affected Fiscal Year. "Projected Budget Deficit" means the City anticipates a budget deficit without substantial cuts to current budget and staff levels. The City may not give notice to the Developer of a Projected Budget Deficit more often than once every six years. Any other increase in the Parking Tax will require the consent of the Developer, which shall not be unreasonably withheld; provided, however, Developer shall have the right to disapprove any such other increase that Developer reasonably determines could cause the Arena to be at any competitive disadvantage as compared with other venues in the Los Angeles metropolitan area that compete with the Arena.

7.2.3 In recognition of the fact that the construction of the Project shall be entirely financed with private funds, in no event shall there be any Exaction imposed upon or revenue sharing with respect to on-site Project signage, sponsorship or naming rights, personal seat licenses, or similar use rights in connection with the Project.

7.2.4 **Plan Check Fees.** Developer shall pay any Processing Fees in effect at the time of the application for that permit or approval. Notwithstanding the foregoing, in lieu of any Processing Fees otherwise payable for building permit plan check ("**Plan Check Fees**"), Developer shall pay City the full costs of a contract planner or contract building plan check

person if such services are mutually determined to be necessary by Developer and the City's Director of Economic and Community Development, or by Developer in order to achieve its desired timeframes for construction of the Project; provided, however, in such event Developer shall pay to City an amount equal to 15% of the contract planner costs to cover the City's administrative costs. Developer shall also pay all City fees and costs relating to monitoring compliance with any permits issued or approvals granted or the performance of any conditions with respect thereto or any performance required of Developer hereunder. However, this Agreement shall not limit the City's authority to charge Processing Fees that are in force on a City-wide basis at the time an application is made for such permit or entitlements, to the extent such fees are not duplicative of Plan Check Fees and payments made by Developer pursuant to this Section 7.2 or the DDA.

**7.2.5 Real Property Transfer Taxes.** To the extent that there are increases in the Real Property Transfer Tax imposed by the City, as listed under the Applicable Exactions, the maximum tax transfer tax that may be imposed on the Property or Project shall not exceed \$1.50 for each \$500.00 or fractional part thereof, of the consideration or value of the interest or property conveyed on any deed or instrument or writing.

**7.2.6** To the extent that there are Exactions not listed on the Applicable Exactions that are first adopted or imposed by City after the Adoption Date, such new Exactions shall not apply to the Project or the Property.

### **7.3 Confirmations.**

**7.3.1 Parking.** For the purposes of determining the parking requirements applicable to the Property, the Project shall comply with the Project Approvals.

**7.3.2 Alcohol.** The sale, service, and consumption of alcohol (beer, wine and distilled spirits, including in the form of bottle service) inside the Arena and elsewhere within the Sports and Entertainment Complex is permitted, subject to compliance with applicable state law and the Project Approvals.

**7.3.3 Public Art.** In furtherance of Section 11-140 of the Inglewood Municipal Code, Developer's public art contributions shall be valued at 1% of the Project valuation, calculated by the Building and Safety Division (the "**Public Art Contribution**"), as further described in the Project Approvals. The Public Art Contribution obligations may be satisfied, at Developer's option, by either (i) the installation of public artwork, (ii) an in-lieu of fee payment, or (iii) a combination of on-site installation public artwork and an in-lieu fee payment. Advance payment of the Public Art Contribution, in whole or in part, by payment of an in-lieu fee, shall not be a condition of issuance of any building permit. If the Developer has elected to satisfy the Public Art Contribution, in whole or in part, by payment of an in-lieu fee, the in-lieu fee shall be paid prior to the issuance of the Certificate of Occupancy for the Arena. If the Developer has elected to satisfy the Public Art Contribution, in whole or in part, by the installation of public art, the installation shall be completed prior to the issuance of the Certificate of Occupancy for the Arena or within a reasonable time thereafter as authorized by the City's Director of Parks, Recreation and Community Services Department and Director of Economic and Community Development Department. The City's Director of Parks, Recreation and Community Services

Department and the Director Economic and Community Development Department, may, as appropriate, after consulting with the staff of the Arts Commission, authorize modification of the City's standards and guidelines for the installation and maintenance of on-site artwork.

**7.4 Uniform Codes Applicable.** The Project shall be constructed in accordance with the provisions of the Uniform Building, Mechanical, Plumbing, Electrical and Fire Codes, City standard construction specifications, and Title 24 of the California Code of Regulations, relating to building standards, in effect at the time of approval of the appropriate building, grading, encroachment or other construction permits for the Project (collectively, the "**Codes**"), taking into account (i) any equivalency determinations made in accordance with Existing City Laws and (ii) any provisions of the Codes that allow for the applicable building standards to be those in effect at the time of permit application.

**7.5 City's Consideration and Approval of Requested Changes in the Project.** Developer may desire to further specify, modify, or expand the plans for the proposed development, use, and operation of the Project after the Adoption Date based upon more precise planning, changes in market demand, changes in development occurring in the vicinity, and similar factors. In such event, the City shall cooperate with Developer to expeditiously review and take final action on such requested changes in accordance with City's Existing City Laws and the Approvals, and all applicable State and Federal laws. Any and all staff or consultant costs necessarily incurred by the City in providing such expeditious review and final action shall be paid by the Developer to the City subject to the provisions of Section 7.2. Any change to the Project so approved by City shall not require an amendment of this Agreement. With regards to any change that is approved by City, the references in this Agreement to the Project or applicable portion thereof shall be deemed to refer to the Project as so changed and the City's approval thereof shall constitute an Approval.

**7.6 Effect of FEIR.** The FEIR contains a thorough analysis of the Project and possible alternatives in compliance with CEQA. The Project Approvals include resolutions of the City Council adopting CEQA findings, including a statement of overriding considerations in accordance with CEQA Guidelines Section 15093 for those significant impacts that could not be mitigated to a less than significant level. Based on the scope of review in the FEIR, the City does not intend to conduct any further environmental review or require further mitigation under CEQA for any aspect of the Project that is vested under this Agreement. The City will rely on the FEIR to the greatest extent permissible under CEQA with respect to all Subsequent Approvals for the Project. Developer acknowledges that the City may conduct additional environmental review if required by CEQA due to any material changes to the Project, and may impose conditions on any Subsequent Approval of material changes to the Project that the City determines is to be required to address significant environmental impacts under CEQA.

**7.7 Mitigation Measures.**

**7.7.1** Developer will comply with all Mitigation Measures identified in the MMRP as the responsibility of the "owner" or the "project sponsor," except for any Mitigation Measures that are expressly identified as the responsibility of a different Person in the MMRP. As part of these requirements, Developer shall comply with the Greenhouse Gas Emissions Conditions of Approval attached hereto as Exhibit H-1, the Air Pollutant Emissions Reduction

Conditions of Approval attached hereto as Exhibit H-2, and the Transportation Demand Program Conditions of Approval attached hereto as Exhibit H-3.

7.7.2 Developer and City will cooperate, at no out-of-pocket cost to the City, in the implementation of the Mitigation Measures identified in the MMRP, and in the ongoing monitoring and reporting requirements of the Mitigation Measures. The Developer will reimburse the City for staff and consultant costs reasonably incurred by City in connection with monitoring Developer's implementation of the Mitigation Measures. Without limiting the generality of the foregoing, City specifically acknowledges and agrees to its role and responsibilities under the Greenhouse Gas Emissions Conditions of Approval attached hereto as Exhibit H-1, the Air Pollutant Emissions Reduction Conditions of Approval attached hereto as Exhibit H-2, and the Transportation Demand Program Conditions of Approval attached hereto as Exhibit H-3.

7.8 **Temporary Street Closures.** The City shall reasonably cooperate with Developer to implement temporary street closures to vehicles for major events at the Arena to eliminate vehicular conflicts and enhance pedestrian circulation during pre-event, event, and post-event hours. Street closures shall be subject to approval of the Inglewood Public Works Director or its designee, in consultation with the Inglewood Chief of Police or its designee.

7.9 **Property Tax Reassessment.** Commencing with the fiscal year as to which the Los Angeles County Assessor determines the new base year value for the completed Arena pursuant to California Revenue and Taxation Code section 71, and continuing for a period of three additional fiscal years thereafter, Developer agrees that it shall not initiate a proceeding under the California Revenue and Taxation Code so as to result in a reduction in the assessed value of the Project for property tax purposes below the amount of Nine Hundred Fifty-Nine Million Dollars (\$959,000,000) (the "**Baseline Value**"). If a proceeding initiated by Developer results in a reduction in the assessed value of the Project below the Baseline Value in violation of the preceding sentence, Developer will pay to the City the Assessment Shortfall on or before the date that the second installment of property taxes for such fiscal year is otherwise payable or, if the second installment was previously paid based on an assessed value in excess of the Baseline Value, within twenty (20) days of the Developer's receipt of a refund on account of the reduction in assessed value. "**Assessment Shortfall**" means, as to each fiscal year, any amount by which (i) the property tax revenue that would be received by the City for such fiscal year if the assessed value of the Project equaled the Baseline Value exceeds (ii) the property tax revenue received by the City for such fiscal years as a result of the reduction in the assessed value of the Project. Payment of the Assessment Shortfall will constitute a cure of any Event of Default with respect to any breach by Developer of the covenant set forth in the first sentence of this Section.

## 8. **APPLICABLE LAW.**

8.1 **Subsequent Rules and Approvals.** Except as provided in Section 7.2, during the Term of this Agreement, City shall not, without Developer's written consent, apply any City ordinances, resolutions, rules, regulations or official policies enacted after the Adoption Date ("**Subsequent Rules**") that would conflict with or impede the Vested Rights of Developer set forth in Section 7 and the subsections therein or otherwise conflict with this Agreement or Existing City Laws; *provided, however*, that nothing shall prevent City from enacting and

applying Subsequent Rules necessary to protect persons or property from any threatened or actual serious physical risk to health and safety, in which case City shall treat Developer in a uniform, equitable, and proportionate manner as all other properties, public and private, which are impacted by that threatened or actual serious physical risk to health and safety.

8.2 **Conflicting Laws.** Without limitation on the generality of Section 8.1 above, any action or proceeding of City (whether enacted by the legislative body or the electorate) undertaken without the consent of Developer that has any of the following effects on the Project shall be in conflict with the Vested Rights, this Agreement, and the Existing City Laws:

- (a) revising the Term of the Agreement;
- (b) limiting, reducing, or modifying:
  - (i) the permitted density, intensity, square footage, location, height or bulk of all or any part of the Project; or
  - (ii) the location of vehicular access or parking or the number and location of parking or loading spaces for the Project in a manner that is inconsistent with this Agreement or the Project Approvals;
- (c) limiting, changing, or controlling the availability of public utilities, services, or facilities or any privileges or rights to public utilities, services, or facilities for the Project or changing or adding additional requirements with respect to the provision of Public Improvements as contemplated by the Project Approvals;
- (d) limiting the processing of applications for or procuring of Subsequent Approvals as provided in this Agreement;
- (e) changing the event permitting requirements, parking requirements, alcohol permitting requirements, or signage provisions;
- (f) impeding or delaying the timely completion of the Project in accordance with the Project Approvals; or
- (g) changing Existing City Laws that causes an adverse impact on the use, operation, functionality, accessibility, or economic competitiveness of the Arena or Project.

8.3 **Changes in State or Federal Law.** This Agreement shall not preclude the application to development of the Property of Subsequent Rules mandated and required by changes in state or federal laws or regulations, provided that City agrees that, to the extent possible, such Subsequent Rules shall be implemented in a manner that does not conflict with Developer's Vested Rights.

8.4 **Subsequent Approvals.** Consistent with Existing City Law and the Project Approvals, the development of the Project is subject to certain future approvals and actions by



City that will be approved after the Adoption Date. These future approvals include discretionary and ministerial actions by City (collectively referred to as "**Subsequent Approvals**"), which may include but are not limited to, demolition permits, SEC Design Review approvals under the SEC Design Guidelines, SEC Improvement Plans approvals under the SEC Infrastructure Plan, grading permits, building permits, final parcel and subdivision maps, lot line adjustments, and mergers. In reviewing and acting on applications for Subsequent Approvals, the City shall act expeditiously and endeavor to expedite processing, including in the manner and within the time frames provided in the Project Approvals, and shall apply the Project Approvals and Existing City Laws when considering the application and may only attach such conditions consistent with the Project Approvals and Existing City Laws as permitted in Sections 7.1 through 7.7 and Sections 8 and 8.1. Each Subsequent Approval, once granted and final, shall be deemed to be an Approval that is automatically incorporated in, governed by, and vested under this Agreement.

9. **MASTER EVENT PERMITTING.**

9.1 **Approved Event Configurations.** Any and all events at the Property including, without limitation, NBA games and other sporting events, concerts, family shows, theatrical performances, trade shows, business conferences, special events, award shows, film shoots, circuses, ice shows, boxing matches, and other events are permitted uses for the Arena under Chapter 12 of the Inglewood Municipal Code. In accordance with Chapter 8, Article 3 of the Inglewood Municipal Code concerning permits, the City Council authorizes any and all events held at the Arena provided they are held in the configurations approved by the Los Angeles County Fire Department (collectively, the "**Approved Event Configurations**"). Pursuant to Section 8-28 of the Inglewood Municipal Code, City has determined that an event held in accordance with an Approved Event Configuration does not need to be subject to additional permit requirements. Developer shall not be required to receive any additional consent from the City or any committee thereof, except as otherwise provided herein, or be subject to any Exactions or other amounts to the City in connection with events held in Approved Event Configurations.

9.2 **Costs of Services.** Developer shall from time to time consult and meet with the City and Los Angeles County Fire Department regarding reasonable and appropriate police, fire, emergency technicians, and ambulance requirements for each Approved Event Configuration and associated costs, taking into account past practice with respect to other venues to the extent applicable. Developer shall pay the costs of reasonable and appropriate police, fire, emergency technicians, and ambulance presence for events on the Property which would not be needed, but for that specific event.

9.3 **Coordination with Other Venues.** If consistent with the Project Approvals and Section 7, the City establishes a process for coordination of event operations and scheduling among major event venues operating within the City, Developer agrees that it will periodically meet and confer with the City and with the operators of such other venues to share non-confidential information regarding past and future events; provided, however, that nothing in this Section 9.3 shall limit or restrict Developer's rights under Section 9.1.

10. **OTHER GOVERNMENTAL PERMITS.** Developer shall apply for such other permits and approvals as may be required from other governmental or quasi-governmental

agencies having jurisdiction over the Project as may be required for the development or operation of the Project. City shall reasonably cooperate with Developer in its endeavors to obtain such permits and approvals.

11. **EASEMENTS; IMPROVEMENTS; ABANDONMENTS.** City shall reasonably cooperate with Developer and any state or federal agencies in connection with any arrangements for abandoning or vacating existing easements, right-of-ways, utilities, or facilities, including groundwater wells and pipelines, and the relocation thereof or creation of any new easements, right-of-ways, utilities, or facilities within the City in connection with the development of the Project; and if any such easement, right-of-way, utility, or facility is owned by City or an agency of City, City or such agency shall, at the request of Developer, take such action and execute such documents as may be reasonably necessary to abandon that existing easement, right-of-way, utility, or facility and relocate them, as necessary or appropriate in connection with the development of the Project. The cost of abandonment and relocation of any such easement shall be the responsibility of Developer.

12. **DESIGN OF ON-SITE AND OFF-SITE IMPROVEMENTS.** Development of the Property shall be subject to City review as provided by the Project Approvals. The Project Approvals, and all improvement plans prepared in accordance with the Project Approvals, including but not limited to the SEC Infrastructure Plan, shall govern the design and scope of all on-site and off-site improvements to be constructed on or benefiting the Property. Once completed in accordance with Applicable Law, the City shall accept all Public Improvements.

13. **SUBDIVISION AND MERGER.** Developer shall have the right, from time to time or at any time, to apply for the subdivision of the Property, as may be necessary in order to develop, lease, or finance any portion of the Property consistent with the Existing City Laws. Any merger or lot line adjustments shall be considered a ministerial approval. It is the intent of the Parties that merger of parcels shall not be required prior to the issuance of building permits but shall be required prior to the issuance of a Certificate of Occupancy for the applicable portion of the Project.

14. **PUBLIC USE AND BENEFITS TO BE PROVIDED BY DEVELOPER.** In conjunction with and in furtherance of the Public Use, the Developer will provide the City, its residents, and the surrounding region with numerous public benefits, including the Public Benefits (that are public benefits in excess of those otherwise having a "nexus" to the Project, and beyond the public benefits that could be expected from the Project in absence of the Agreement) identified in Exhibit C. In exchange for the Public Benefits to the City, City shall grant the permits and approvals required for the development, use, and operation of the Project, over the Term of this Agreement in accordance with procedures provided by Applicable Law and in this Agreement, and agrees that Developer may proceed with the development, use, and operation of the Project in accordance with the Applicable Law.

15. **TRANSFERS AND ASSIGNMENTS**

15.1 **Transfers Prior to Release of Construction Covenants.** Prior to the City's issuance of a "Release of Construction Covenants" (as the term is defined under the DDA), Developer shall not Transfer all or any portion of the Property to which it has acquired title to a

third party (a "**Transferee**") without the prior written approval of the City, which shall be given or reasonably withheld within five (5) City-business days; provided, however, such approval shall be given if such Transfer is permitted under the terms of the DDA or is approved by the City pursuant to the DDA.

**15.2 Transfers After Release of Construction Covenants.** Once the City issues a Release of Construction Covenants under the DDA, the Developer shall have the right, subject to (i) the terms of this Section 15.2 and (ii) any covenants and conditions encumbering the Transferred Property, including any applicable Public Use Restriction, to assign or transfer all or any portion of its interest, rights or obligations under this Agreement to Transferees acquiring an interest or estate in all or any portion of the Property (the "**Transferred Property**"), including, but not limited to, purchases or long term ground leases of individual lots, parcels, or any of the buildings located within the Property. Any Transfer shall comply with the California Subdivision Map Act and Applicable Law. Developer shall provide 30 days written notice to City prior to the effective date of any Transfer of its interest in all or any portion of the Property or any of its interests, rights and obligations under this Agreement; *provided, however*, that in the case of such a Transfer to an Affiliate, Developer shall only be required to provide 10 days written notice to City. Upon the effective date of Transfer for which notice is given as provided above, the Transferee shall be deemed a Party. Developer shall remain fully liable for all obligations and requirements under this Agreement after the effective date of the Transfer, unless Developer satisfies the following conditions: (i) prior to the effective date of the Transfer, Transferee executes and delivers to City an Assignment and Assumption Agreement (to be effective upon completion of the Transfer) in the form set forth in Exhibit G to this Agreement specifying the obligations and requirements to be assumed by Developer hereunder as to the Transferred Property; and (ii) Developer has not received a notice of an Event of Developer Default that remains uncured as of the effective date of the Transfer. If the foregoing conditions are satisfied, then the Transferor shall be released from any further liability or obligation under this Agreement and the Transferee shall be deemed to be the "Developer" under this Agreement with all rights and obligations related thereto, with respect to such Transferred Property. Notwithstanding anything to the contrary contained in this Agreement, but subject to the terms of any applicable Public Use Restriction, if a Transferee Defaults under this Agreement, such Default shall not constitute a Default by Developer with respect to any other portion of the Property hereunder and shall not entitle City to terminate or modify this Agreement with respect to such other portion of the Property.

## 16. **MORTGAGEE OBLIGATIONS AND PROTECTIONS.**

**16.1 Encumbrances on the Property.** Upon obtaining title to the Property or any portion thereof, Developer may encumber the Property or any portion thereof as to which it holds title or any improvements thereon with any Mortgage securing financing with respect to the Property, whether it is before or after the recordation of the Release of Construction Covenants (as defined in the DDA); provided, however, that prior to the recordation of the Release of Construction Covenants, the proceeds of any such Mortgage shall be for the purpose of securing loans and funds to be used to develop or finance the acquisition of the Property or any portion thereof. A Mortgagee shall not be bound by any amendment, implementation, or modification to this Agreement subsequent to its approval (or deemed approval) without such Mortgagee giving its prior written consent.

16.2 **Mortgagee Obligations.** A Mortgagee not in legal possession of the Property or any portion thereof shall not be subject to the obligations or liabilities of Developer under this Agreement, including the obligation to construct or complete construction of improvements or pay fees. A Mortgagee in legal possession shall not have any obligation or duty under this Agreement to construct or complete the construction of improvements, or to pay, perform or provide any fee, dedication, improvements or other Exaction or imposition. A Mortgagee in legal possession of the Property or portion thereof shall only be entitled to use the Property or to construct any improvements on the Property in accordance with the Approvals and this Agreement if Mortgagee fully complies with the terms of this Agreement.

16.3 **Mortgage Protection.** This Agreement shall be superior and senior to any lien placed upon the Property, or any portion thereof, after the date of recording this Agreement, including the lien for any deed of trust or Mortgage. Notwithstanding the foregoing, no breach of this Agreement shall defeat, render invalid, diminish, or impair the lien of any Mortgage made in good faith and for value, but all the terms and conditions contained in this Agreement shall be binding upon and effective against any Person or entity, including any deed of trust beneficiary or Mortgagee that acquires title to the Property, or any portion thereof, by foreclosure, trustee's sale, deed in lieu of foreclosure, or otherwise, and any such Mortgagee or successor to a Mortgagee or assignee of a Mortgagee that takes title to the Property or any portion thereof shall be entitled to the benefits arising under this Agreement.

16.4 **Notice of Event of Developer Default to Mortgagee; Right to Cure.** If City receives notice from a Mortgagee requesting a copy of any notice of an Event of Developer Default given to Developer under this Agreement and specifying the address for service thereof, then City shall deliver to such Mortgagee, concurrently with service thereon to Developer, any notice given to Developer with respect to any claim by City that an Event of Developer Default has occurred or a Certificate of Non-Compliance has been issued to Developer. Each Mortgagee shall have the right during the same period available to Developer to cure or remedy, or to commence to cure or remedy, the Event of Developer Default or non-compliance as provided in this Agreement; *provided, however*, that if the Event of Developer Default, noncompliance, or Certificate of Non-Compliance is of a nature which can only be remedied or cured by such Mortgagee upon obtaining possession, such Mortgagee may seek to obtain possession with diligence and continuity through a receiver or otherwise, and shall thereafter remedy or cure the Event of Developer Default, noncompliance or Certificate of Non-Compliance within 90 days after obtaining possession. If any such Event of Developer Default, noncompliance or Certificate of Non-Compliance cannot, with diligence, be remedied or cured within such 90-day period, then such Mortgagee shall have such additional time as may be reasonably necessary to remedy or cure such Event of Developer Default, noncompliance or Certificate of Non-Compliance (including but not limited to proceeding to gain possession of the Property) if such Mortgagee commences a cure during such 90-day period, and thereafter diligently pursues completion of such cure to the extent reasonably possible.

16.5 **Request for Notice of Default.** Following the recordation of the Release of Construction Covenant, City shall have the right to record a request for notice of default in accordance with California Civil Code Section 2924b with respect to any Mortgage. If City has recorded a request for notice of default with respect to any Mortgage, City shall thereafter have

the right to cure defaults under such Mortgage as provided in California Civil Code Section 2924c(a).

17. **INTENTIONALLY OMITTED.**

18. **ESTOPPEL CERTIFICATE.** Any Party (the "**Requesting Party**") may at any time deliver written notice to the other Party (the "**Certifying Party**") requesting that the Certifying Party certify to the Requesting Party (and/or any proposed Transferee or Mortgagee of the Requesting Party) in writing that, to the knowledge of the Certifying Party, (a) this Agreement is in full force and effect and a binding obligation of the Parties, (b) this Agreement has not been an ended or modified either orally or in writing, and if so amended, identifying the amendments, (c) the Requesting Party is not in Default in the performance of its obligations under this Agreement, or if in Default, to describe therein the nature and amount of any such Default, and (d) such other information as may reasonably be requested. A Certifying Party receiving a request hereunder shall execute and return such certificate within 30 days following the receipt of such a request. The City Manager shall have the right, but not the obligation, to execute any certificate requested by Developer hereunder in the event he or she elects to not submit the certificate request to the City Council for its consideration. A certificate hereunder may be relied upon by the Requesting Party and any Transferee or Mortgagee to whom it has been issued.

19. **ANNUAL REVIEW.**

19.1 **Review Date.** The annual review date for this Agreement shall occur on October 1 of each full calendar year following the Effective Date of this Agreement ("**Annual Review Date**"). During each annual review, Developer shall be required to demonstrate good faith compliance with the terms of this Agreement, including, without limitation, compliance with the Greenhouse Gas Emissions Condition of Approval set forth in Exhibit H-1.

19.2 **Required Information from Developer.** By June 1 of each year prior to the Annual Review Date, Developer shall provide a letter to the City Manager containing evidence of good faith compliance with this Agreement. Upon the written request of City, which shall be made, if at all, within 60 days of the submission of Developer's letter, Developer shall also furnish such reasonable additional evidence and documentation of such good faith compliance as the City, in the exercise of its reasonable discretion, may require ("**Additional Documentation**").

19.3 **City Report.** Within 60 days after receipt by the City Manager of Developer's Additional Documentation, the City Manager shall review the Additional Documentation submitted by Developer and all other available evidence of Developer's compliance with this Agreement. Following such review, the City Manager shall timely notify Developer in writing whether Developer has complied with the terms of this Agreement and shall issue a Certificate of Compliance to Developer, if such is the case. If City Manager finds Developer is not in compliance, the City Manager shall timely issue a Certificate of Non-Compliance to Developer, together with any available evidence of such non-compliance, after complying with the procedures set forth in Section 19.4.

**19.4 Non-Compliance with Agreement; Hearing.** Prior to issuing a Certificate of Non-Compliance, if the City Manager finds that Developer has not complied with the terms of this Agreement, the City Manager shall indicate in writing to Developer, with reasonable specificity, any aspect in which Developer has failed to comply. The City Manager shall also specify a reasonable time for Developer to meet the terms of compliance, which time shall be not less than 30 days, and shall be reasonably related to the time necessary for Developer to adequately bring its performance into compliance with the terms of this Agreement, subject to any Permitted Delay; *provided, however*, that if the noncompliance solely involves a monetary Default, then the City Manager may require payment from Developer within 10 business days.

If Developer fails to adequately bring its performance into compliance as set forth above, then the City Manager shall issue a Certificate of Non-Compliance to Developer indicating (1) with reasonable specificity the reason(s) for the determination, in the manner prescribed in Section 19.3, and (ii) whether the City Manager is or is not recommending that the City Council modify or Terminate this Agreement. If the Certificate of Non-Compliance does not recommend modification or Termination of this Agreement, then the City Council, upon the receipt of a written request of Developer within 10 days of the City Manager's issuance of the Certificate of Non-Compliance, shall conduct a meeting within 45 days of City Council's receipt of Developer's request. Developer shall be given 10 days written notice of the meeting and copies of any additional evidence not previously provided to Developer upon which the City Manager made their determination that the Developer did not adequately bring its performance into compliance. If the City Manager issues a Certificate of Non-Compliance that includes a recommendation that the City Council modify or Terminate this Agreement, then the City Council shall conduct a noticed public hearing within 45 days in accordance with Applicable Law. Developer shall be given copies of any additional evidence not previously provided to Developer upon which the City Manager made their determination as to compliance. Developer shall have the opportunity to present evidence at any public hearing. If the City Council determines that Developer is not in compliance with this Agreement at such public hearing, it may Terminate this Agreement, or initiate proceedings to modify or otherwise enforce it.

**19.5 Appeal of Determination.** The decision of the City Council as to Developer's compliance shall be final, and any court action or proceeding to attack, review, set aside, void, or annul that decision shall be commenced within 30 days of the City Council's final decision.

**19.6 Costs.** Costs reasonably incurred by City in connection with the annual review conducted pursuant to Section 19.1 and related hearings shall be paid by Developer in accordance with City's schedule of fees and billing rates for staff time in effect at the time of review. Such costs shall also include the cost of consultants necessarily and reasonably incurred by City in carrying out its obligations pursuant to this Section 19.6.

**19.7 Default.** The rights and powers of the City Council under this Section 19 are in addition to, and shall not limit, the rights of City to Terminate or take other action under this Agreement on account of the commission by Developer of an Event of Developer Default.

20. **INDEMNIFICATION.**

20.1 **Obligation to Indemnify.** Developer agrees to indemnify, defend, and hold harmless City, any City agencies and their respective elected and appointed councils, boards, commissions, officers, agents, employees, contractors, volunteers and representatives (collectively, the "**Indemnified Parties**") from any and all losses, liability, fines, penalties, forfeitures, costs and damages (whether in contract, tort or strict liability, including but not limited to personal injury, death and property damage) (collectively, "**Losses**") and from any and all claims, demands, and actions in law or equity (including reasonable attorneys' fees and litigation expenses) by any third party (collectively, "**Claims**") that are (a) directly or indirectly arising or alleged to have arisen out of or in any way related to the approval of this Agreement or the Project Approvals or (b) incurred by an Indemnified Party as a result of Developer's failure to comply with any Environmental Law. Notwithstanding the foregoing, Developer shall have no indemnification obligation pursuant to clause (b), above, with respect to the gross negligence or willful misconduct of any Indemnified Party. The obligations under this Section 20 shall survive Termination of this Agreement.

20.2 **Indemnification Procedures.**

20.2.1 In order for an Indemnified Party to be entitled to indemnification provided under this Section 20 in respect of, arising out of, or involving a Loss or a Claim by any Person against the Indemnified Party (each, an "**Indemnification Claim**"), such Indemnified Party shall promptly give notice, in writing and in reasonable detail, to Developer thereof; provided, that failure to give reasonable prompt notification shall not affect the indemnification provided hereunder except to the extent Developer shall have been actually and materially prejudiced as a result of such failure to promptly notify.

20.2.2 Developer shall have the right, at its sole option and expense, to be represented by counsel of its choice, which must be reasonably satisfactory to the Indemnified Party, and to defend against, negotiate, settle or otherwise deal with any Indemnification Claim which relates to any Losses indemnified against by it hereunder. If Developer elects to defend against, negotiate, settle or otherwise deal with any Indemnification Claim which relates to any Losses indemnified against by it hereunder, it shall within 30 days (or sooner, if the nature of the Indemnification Claim so requires) notify the Indemnified Party in writing of its intent to do so. If Developer elects not to defend against, negotiate, settle, or otherwise deal with any Indemnification Claim which relates to any Losses indemnified against hereunder, the Indemnified Party may (at Developer's sole cost and expense) defend against, control, negotiate, settle, or otherwise deal with such Indemnification Claim. If Developer shall assume the defense of any Indemnification Claim, the Indemnified Party may participate, at its expense, in the defense of such Indemnification Claim; *provided, however*, that such Indemnified Party shall be entitled to participate in any such defense with separate counsel at the expense of Developer only if (a) so requested by Developer to participate or (b) the nature of the claim creates an ethical conflict for the same counsel to defend the Indemnified Party and Developer; and provided, further, that Developer shall not be required to pay for more than one such counsel for all Indemnified Parties in connection with any Indemnification Claim. The Parties shall cooperate fully with each other in connection with the defense, negotiation, or settlement of any such Indemnification Claim. Notwithstanding anything to the contrary herein, neither Developer nor

the Indemnified Party shall, without the written consent of the other party (which shall not be unreasonably withheld, conditioned, or delayed), settle or compromise any Indemnification Claim or permit a default or consent to entry of any judgment unless (x) the claimant(s) and such party provide to such other party an unqualified release from all liability in respect of the Indemnification Claim and (y) in the case of any such settlement, compromise, consent to default, or to entry of any judgment by Developer, such settlement, compromise, or judgment otherwise provides solely for payment of monetary damages for which the Indemnified Party will be indemnified in full.

## 21. AMENDMENT, CANCELLATION, OR SUSPENSION.

21.1 **Modification Because of Conflict with State or Federal Laws.** In the event that State or Federal laws or regulations enacted after the Effective Date of this Agreement prevent or preclude compliance with one or more provisions of this Agreement or require substantial and material changes in the Approvals, the Parties shall meet and confer in good faith in a reasonable attempt to modify this Agreement to comply with such law or regulation. Any such amendment to the Agreement that is agreed upon by the Parties shall be submitted for approval consideration by the City Council in accordance with California law, the City's Municipal Code, and this Agreement.

21.2 **Amendment by Mutual Consent.** This Agreement may be amended in writing from time to time by mutual consent of the Parties and in accordance with the procedures of California law and the City's Municipal Code, or as otherwise permitted by this Agreement.

21.3 **Substantive Amendments.** Any Substantive Amendment to the Agreement shall require the City's approval in accordance with Applicable Law. "**Substantive Amendment**" means any change to the term of this Agreement beyond the Term and provision(s) in this Agreement related to monetary contributions or payments by Developer.

21.4 **Minor Amendment.** A "**Minor Amendment**" is any amendment of this Agreement other than a Substantive Amendment, including waiver of conditions for the benefit of another party and modifications to the Project's Mitigation Measures or conditions to the Approvals, provided that the City Manager finds that, on the basis of substantial evidence, the changed measures or conditions are equivalent to or more effective. The City Manager and Developer may approve a Minor Amendment by written agreement without a public hearing to the extent permitted by Applicable Law, including without limitation Government Code Section 65868; provided however, the City Manager shall have the discretion to seek such approval by the City Council.

21.5 **Cancellation/Termination.** This Agreement may be Terminated in whole or in part by the mutual consent of City and Developer or their successors in interest, in accordance with Applicable Law. The City shall retain any fees or payments of any kind paid under this Agreement or any other agreement relating to this Agreement and made prior to the date of termination. In addition, notwithstanding any other provision of this Agreement, if the DDA is terminated prior to the conveyance of title and possession of the Property to the Developer, this Agreement shall also terminate.



22. **DEFAULT.**

22.1 **Developer Default.** Any of the actions referenced below shall constitute an event of default on the part of Developer ("**Event of Developer Default**"). Upon an Event of Developer Default (other than an event of default under subparagraph (a) below), the City shall give written notice of default to Developer, specifying the default at issue. City may not exercise any rights or remedies upon a default by Developer, unless and until such default continues beyond any applicable cure period set forth in this Section 21.1 after written notice thereof from City. Developer shall have the opportunity to appear before the City Council at a public hearing prior to the exercise of any of City's rights or remedies under this Agreement with respect to an Event of Developer Default.

- (a) Developer is dissolved or terminated; or
- (b) Developer fails to keep, observe, or perform any of its covenants, duties or obligations under this Agreement in any material respect, and the default continues for a period of 10 days in the event of a monetary default or 30 days after written notice thereof from City to Developer, or in the case of a default which cannot with due diligence be cured within 30 days, Developer fails to commence to cure the default within 30 days of such notice and thereafter fails to pursue the curing of such default with due diligence and in good faith to completion.

22.2 **City Default.** An event of default on the part of City ("**Event of City Default**") shall arise if City fails to keep, observe, or perform any of its covenants, duties, or obligations under this Agreement, and the default continues for a period of 10 days in the event of a monetary default or 30 days after written notice thereof from Developer to City, or in the case of a default which cannot with due diligence be cured within 30 days, City fails to commence to cure the default within 30 days of such notice and thereafter fails to prosecute the curing of such default with due diligence and in good faith to completion. Developer shall give written notice of default to City, specifying the default at issue. Developer may not exercise any rights or remedies upon an Event of City Default, unless and until such default continues beyond any applicable cure period set forth in this Section 22.2 after written notice thereof from Developer.

23. **REMEDIES FOR DEFAULT.** Subject to the notice and cure provisions in Section 22, the sole and exclusive judicial remedy for any Party in the event of a Default by the other Party shall be an action in mandamus, specific performance, or other injunctive or declaratory relief. In addition, upon the occurrence of a Default and subsequent to the procedures described in Section 22, the non-defaulting Party shall have the right to Terminate this Agreement, but any such Termination shall not affect such Party's right to seek a remedy on account of the Default for which this Agreement has been Terminated, and shall be subject to the procedures specified in this Agreement. The City, any City agencies, and their respective elected and appointed councils, boards, commissions, officers, agents, employees, volunteers and representatives (collectively, for purposes of this Section 23, "**City**") shall not be liable for any monetary damages for an Event of City Default or any claims against City arising out of this Agreement. Developer waives any such monetary damages, including consequential, punitive, and special damages, against City. Similarly, Developer and its officers, directors, agents, employees,

volunteers, and representatives (collectively, for purposes of this Section 23, "**Developer**") shall not be liable for any monetary damage for a Default by Developer or any claims against Developer arising out of this Agreement. City waives any such monetary damages, including consequential, punitive, and special damages against Developer. Any legal action by a Party alleging a Default must be filed within 180 days from the end of the default procedure described in Section 24.

24. **PROCEDURE REGARDING DEFAULTS.** For purposes of this Agreement, a Party claiming another Party is in Default shall be referred to as the "**Complaining Party**," and the Party alleged to be in Default shall be referred to as the "**Party in Default**." A Complaining Party shall not exercise any of its remedies as the result of Default unless such Complaining Party first gives notice to the Party in Default as provided in this Section, and the Party in Default fails to cure such Default within the applicable cure period.

24.1 **Notice.** The Complaining Party shall give written notice of Default to the Party in Default, specifying the Default alleged by the Complaining Party. Delay in giving such notice shall not constitute a waiver of any Default nor shall it change the time of Default.

24.2 **Cure.** Subject to Section 30, the Party in Default shall have 30 days from receipt of the notice of Default to effect a cure prior to exercise of remedies by the Complaining Party. If the nature of the alleged Default is such that it cannot, practicably be cured within such 30-day period, the cure shall be deemed to have occurred within such 30-day period if: (a) the cure shall be commenced at the earliest practicable date following receipt of the notice; (b) the cure is diligently prosecuted to completion at all times thereafter; (c) at the earliest practicable date (in no event later than 30 days after the curing Party's receipt of the notice), the curing Party provides written notice to the other Party that the cure cannot practicably be completed within such 30-day period; and (d) the cure is completed at the earliest practicable date. The Party in Default shall diligently endeavor to cure, correct, or remedy the matter complained of, provided such cure, correction or remedy shall be completed within the applicable time period set forth herein after receipt of written notice (or such additional time as may be agreed to by the Complaining Party to be reasonably necessary to correct the matter).

24.3 **Failure to Assert.** Any failures or delays by a Complaining Party in asserting any of its rights and remedies as to any Default shall not operate as a waiver of any Default or of any such rights or remedies. Delays by a Complaining Party in asserting any of its rights and remedies shall not deprive the Complaining Party of its right to institute and maintain any actions or proceedings, which it may deem necessary to protect, assert, or enforce any such rights or remedies.

24.4 **Procedure for Terminating Agreement upon Default.** If City desires to Terminate this Agreement in the event of an Event of Developer Default, the matter shall be set for a public hearing before the City Council. The burden of proof of whether a Party is in Default shall be on the Party alleging Default. If the City Council determines that an Event of Developer Default has occurred and has not been cured to City's reasonable satisfaction, or that the Event of Developer Default presents a serious risk to public health, safety, or welfare, the City Council may Terminate this Agreement.

24.5 **No Cross Default.** Notwithstanding anything to the contrary in this Agreement, if Developer has effected a Transfer so that its interest in the Property has been divided between Transferees, then any determination that a Party is in Default shall be effective only as to the Party to whom the determination is made and the portions of the Property in which such Party has an interest.

25. **ATTORNEYS' FEES AND COSTS IN LEGAL ACTIONS BY PARTIES TO THE AGREEMENT.** If any Party brings an action or proceeding (including, without limitation, any cross-complaint, counterclaim, or third-party claim) against the other Party by reason of a Default, or otherwise arising out of this Agreement, the Prevailing Party in such action or proceeding shall be entitled to its costs and expenses of suit, including reasonable attorneys' fees (including, without limitation, costs and expenses), which shall be payable whether or not such action is prosecuted to judgment. "**Prevailing Party**" within the meaning of this Section 25 shall include, without limitation, a Party who dismisses an action for recovery hereunder in exchange for payment of the sums allegedly due, performance of covenants allegedly breached, or consideration substantially equal to the relief sought in the action.

26. **ATTORNEYS' FEES AND COSTS IN LEGAL ACTIONS BY THIRD PARTIES TO THE AGREEMENT.** If any Person or entity not a party to this Agreement initiates an action at law or in equity to challenge the validity of any provision of this Agreement or the Approvals, the Parties shall fully cooperate in defending such action. Developer shall bear its own costs of defense as a real party in interest in any such action, and Developer shall reimburse City for all reasonable costs (including court costs) and reasonable attorneys' fees actually incurred by City in defense of any such action or other proceeding. In its sole discretion, City may tender its defense of such action to Developer or defend the action itself. Upon a tender of defense to Developer by City, Developer shall defend through counsel approved by City, which approval shall not be unreasonably withheld, and Developer shall bear all reasonable attorneys' fees and costs from the date of tender.

27. **BINDING ON SUCCESSORS; AGREEMENT RUNS WITH THE LAND.** Except as otherwise expressly provided for in this Agreement, upon the Effective Date, all of the provisions, agreements, rights, terms, powers, standards, covenants, and obligations contained in this Agreement shall be binding upon the Parties, and their respective heirs, successors and assignees. Upon recording of this Agreement with respect to each portion of the Property, all of the provisions of this Agreement shall be binding on all other Persons acquiring the Property, or any portion thereof, or any interest therein, whether by operation of law or in any manner whatsoever, and shall be enforceable as equitable servitudes and shall constitute covenants running with the land pursuant to Applicable Law, including Section 1468 of the California Civil Code.

28. **BANKRUPTCY.** The obligations of this Agreement shall not be dischargeable in bankruptcy.

29. **INSURANCE.**

29.1 **Public Liability and Property Damage Insurance.** At all times that Developer is constructing any improvements that are part of the Project ("**Construction Work**"), Developer

shall maintain in effect a policy of comprehensive commercial general liability insurance with a per-occurrence single limit of not less than \$2,000,000, an additional \$25,000,000 in umbrella and excess liability coverage, and a self-insured retention of not more than \$250,000 per claim. This self-insured retention may be increased based on the availability of insurance with such self-insured retentions at commercially reasonable premiums. The policy so maintained by Developer shall name City as an additional insured and shall include either a severability of interest clause or cross-liability endorsement.

29.2 **Workers' Compensation Insurance.** At all times that Developer is undertaking the Construction Work, Developer shall maintain workers' compensation insurance as required by California law for all persons employed by Developer for work at the Project site. Developer shall require each contractor and subcontractor similarly to provide workers' compensation insurance for its respective employees. Developer shall indemnify City for any damage resulting from Developer's failure to maintain any such insurance.

29.3 **Evidence of Insurance.** Prior to commencement of the Construction Work, Developer shall furnish City satisfactory evidence of the insurance required in Sections 29.1 and 29.2 and evidence that Developer is required to give the City at least 15 days prior written notice of the cancellation or reduction in coverage of a policy. The insurance shall extend to City, other City agencies, and their respective elective and appointive boards, commissions, officers, agents, employees, volunteers, and representatives as additional insureds with respect to this Agreement and to Developer performing work on the Project.

30. **EXCUSE FOR NONPERFORMANCE.** Notwithstanding any provision of this Agreement to the contrary, Developer and City shall be excused from performing any obligation or undertaking provided in this Agreement in the event of, and so long as the performance of any such obligation is prevented or delayed, retarded or hindered by, a(n) act of God, fire, earthquake, flood, explosion, action of the elements, war, invasion, insurrection, riot, mob violence, sabotage, inability to procure or general shortage of labor, equipment, facilities, materials or supplies in the open market, failure of transportation, strikes, lockouts, condemnation, requisition, Applicable Law, litigation, orders of governmental, civil, military or naval authority, or any other cause, whether similar or dissimilar to the foregoing, not within the control of the Party claiming the extension of time to perform (a "**Permitted Delay**").

31. **THIRD PARTY BENEFICIARIES.** This Agreement is made and entered into for the sole protection and benefit of Developer and City and their successors and assigns. No other Person shall have any right of action based upon any provision in this Agreement. There is no third party beneficiary to this Agreement and nothing contained herein shall be construed as giving any Person third party beneficiary status.

32. **SEVERABILITY.** Except as set forth herein, if any term, covenant or condition of this Agreement or the application thereof to any Person, entity or circumstance shall, to any extent, be invalid or unenforceable, the remainder of this Agreement, or the application of such term, covenant or condition to Persons, entities or circumstances other than those as to which it is held invalid or unenforceable, shall not be affected thereby and each term, covenant or condition of this Agreement shall be valid and be enforced to the fullest extent permitted by law; *provided, however,* if any provision of this Agreement is determined to be invalid or unenforceable and the

effect thereof is to deprive a Party of an essential benefit of its bargain hereunder, then such Party so deprived shall have the option to Terminate this entire Agreement (with respect to the portions of the Property in which such Party has an interest) from and after such determination.

33. **WAIVER: REMEDIES CUMULATIVE.** Failure by a Party to insist upon the strict performance of any of the provisions of this Agreement by the other Party, irrespective of the length of time for which such failure continues, shall not constitute a waiver of such Party's right to demand strict compliance by such other Party in the future. The Party for whose benefit a covenant or commitment is provided may waive its rights pursuant to that commitment or covenant, provided that no waiver by a Party of a Default shall be effective or binding upon such Party unless made in writing by such Party and no such waiver shall be implied from any omission by a Party to take any action with respect to such Default. No express written waiver of any Default shall affect any other Default, or cover any other period of time, other than any Default and/or period time specified in such express waiver. Except as provided in Section 23, all of the remedies permitted or available to a Party under this Agreement, or at law or in equity, shall be cumulative and not alternative, and invocation of any such right or remedy shall not constitute a waiver or election of remedies with respect to any other available right or remedy.

34. **APPLICABLE LAW AND VENUE.** This Agreement, and the rights and obligations of the Parties, shall be governed by and interpreted in accordance with the laws of the State of California. Any lawsuit or legal proceeding arising hereunder shall be heard in the United States District Court for the Central District if in federal court or, if in California Superior Court, the Los Angeles County Superior Court, Southwest District located at 825 Maple Avenue, Torrance, California 90503-5058.

35. **NOTICES.** Any notice to either Party required by this Agreement, the enabling legislation, or the procedure adopted pursuant to Government Code Section 65865, shall be in writing and given by delivering the same to such Party in person or by sending the same by registered or certified mail, or express mail, return receipt requested, with postage prepaid, to the Party's mailing address. The respective mailing addresses of the Parties are, until changed as hereinafter provided, the following:

City: City of Inglewood  
One Manchester Boulevard  
Inglewood, California 90301  
Attention: City Manager

with a copy to: Office of the City Attorney  
One Manchester Boulevard  
Inglewood, California 90301  
Attention: City Attorney

with a copy to: Kane, Ballmer & Berkman  
(and shall not constitute 515 S. Figueroa Street, Suite 780  
notice to City) Los Angeles, California 90071  
Attention: Royce K. Jones

Developer: Murphy's Bowl LLC  
PO Box 1558  
Bellevue, WA 98009-1558  
Attention: Brandt A. Vaughan

with a copy to: Wilson Meany  
(and shall not constitute Four Embarcadero Center, Suite 3330  
notice to Developer) San Francisco, CA 94111  
Attention: Chris Meany

with a copy to: Helsell Fetterman, LLP  
(and shall not constitute 1001 Fourth Avenue, Suite 4200  
notice to Developer) Seattle, WA 98154  
Attention: Mark Rising

with a copy to: Coblenz Patch Duffy & Bass LLP  
(and shall not constitute One Montgomery Street , Suite 3000  
notice to Developer) San Francisco, CA 94104  
Attention: Matthew J. Bove

Any Party may change its mailing address at any time by giving written notice of such change to the other Party in the manner provided herein at least 10 business days prior to the date such change is affected. All notices under this Agreement shall be deemed given, received, made, or communicated on the date personal delivery is affected or, if mailed, on the delivery date or attempted delivery date shown on the return receipt.

36. **FORM OF AGREEMENT; RECORDATION; EXHIBITS.** City shall cause this Agreement, any amendment hereto, any notice of modification of a Project Approval and any Termination of any parts or provisions hereof, to be recorded, at Developer's expense, with the County Recorder within 10 days of the effective date thereof. Any amendment or Termination of this Agreement to be recorded that affects less than all of the Property shall describe the portion thereof that is the subject of such amendment or Termination. This Agreement is executed in three duplicate originals, each of which is deemed to be an original.

This Agreement consists of \_ pages and \_ Exhibits (Exhibits A- H-3), which constitute the entire understanding and agreement of the Parties.

37. **FURTHER ASSURANCES.** Each Party covenants, on behalf of itself and its successors, heirs and assigns, to take all actions and do all things, and to execute, with acknowledgment or affidavit if required, any and all documents and writings that may be necessary or proper to achieve the purposes and objectives of this Agreement.

38. **APPROVALS.** Unless otherwise herein provided, whenever a determination, approval, consent, or satisfaction (herein collectively referred to as "**consent**") is required of a Party pursuant to this Agreement, such consent shall not be unreasonably withheld, conditioned, or delayed. If a Party shall not consent, the reasons therefore shall be stated in reasonable detail in writing. Consent by a Party to or of any act or request by the other Party shall not be deemed to

waive or render unnecessary consent to or of any similar or subsequent acts or requests. Consent given or withheld by the City Manager may be appealed by Developer to the City Council.

39. **ENTIRE AGREEMENT.** This written Agreement, including the Exhibits attached hereto, together with the DDA, contain all the representations and the entire agreement between the Parties with respect to the subject matter hereof. Except as otherwise specified in this Agreement, any prior correspondence, memoranda, agreements, warranties, or representations are superseded in total by this Agreement.

40. **CONSTRUCTION OF AGREEMENT.** The provisions of this Agreement and the Exhibits shall be construed as a whole according to their common meaning and not strictly for or against any Party in order to achieve the objectives and purpose of the Parties. The captions preceding the text of each Article, Section, subsection and the Table of Contents are included only for convenience of reference and shall be disregarded in the construction and interpretation of this Agreement. Wherever required by the context, the singular shall include the plural and vice versa, and the masculine gender shall include the feminine or neuter genders, or vice versa. Unless otherwise specified, whenever in this Agreement reference is made to the Table of Contents, any Article or Section, or any defined term, such reference shall be deemed to refer to the Table of Contents, Article, Section, or defined term of this Agreement. Exhibits to this Agreement shall be incorporated into this Agreement as if stated fully herein. The use in this Agreement of the words "including," "such as," or words of similar import when following any general term, statement, or matter shall not be construed to limit such statement, term or matter to the specific items or matters, whether or not language of non-limitation, such as "without limitation" or "but not limited to," or words of similar import, are used with reference thereto, but rather shall be deemed to refer to all other items or matters that could reasonably fall within the broadest possible scope of such statement, term, or matter. This Agreement has been reviewed and revised by legal counsel for the Developer and City, and no presumption or rule that ambiguities shall be construed against the drafting Party shall apply to the interpretation or enforcement of this Agreement.

41. **NEXUS/REASONABLE RELATIONSHIP CHALLENGES.** Developer consents to, and waives any and all rights it may have now or in the future to challenge the legal validity of, this Agreement or the Project Approvals (to the extent approved in the forms agreed with Developer), including any conditions, requirements, policies or programs imposed in this Agreement including, without limitation, any claim that any conditions, requirements, policies or programs may constitute an abuse of police power, violate substantive due process, deny equal protection of the laws, effect a taking of property without payment of just compensation or impose an unlawful tax or fee.

42. **SIGNATURE PAGES.** For convenience, the signatures of the Parties to this Agreement may be executed and acknowledged on separate pages in counterparts which, when attached to this Agreement, shall constitute this as one complete Agreement.

43. **TIME.** Time is of the essence of this Agreement and of each and every term and condition hereof.

[SIGNATURES APPEAR ON FOLLOWING PAGE]

**IN WITNESS WHEREOF**, the City of Inglewood, a municipal corporation, has authorized the execution of this Agreement in duplicate by its Mayor and attested to by its City Clerk under the authority of Ordinance No. \_\_\_\_\_, adopted by the City Council of the City of Inglewood on the \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_, and Developer has caused this Agreement to be executed.

**"CITY"**

**"DEVELOPER"**

**CITY OF INGLEWOOD,**  
a municipal corporation

**MURPHY'S BOWL LLC,**  
a Delaware limited liability company

By: \_\_\_\_\_  
James T. Butts, Jr.  
Mayor

\_\_\_\_\_  
Name:  
Title:

**ATTEST:**

By: \_\_\_\_\_  
City Clerk

**APPROVED AS TO FORM:**

**Kenneth R. Campos**  
City Attorney

By: \_\_\_\_\_  
Kenneth R. Campos

**APPROVED:**

**KANE BALLMER & BERKMAN**  
Special City Counsel

By: \_\_\_\_\_  
Royce K. Jones



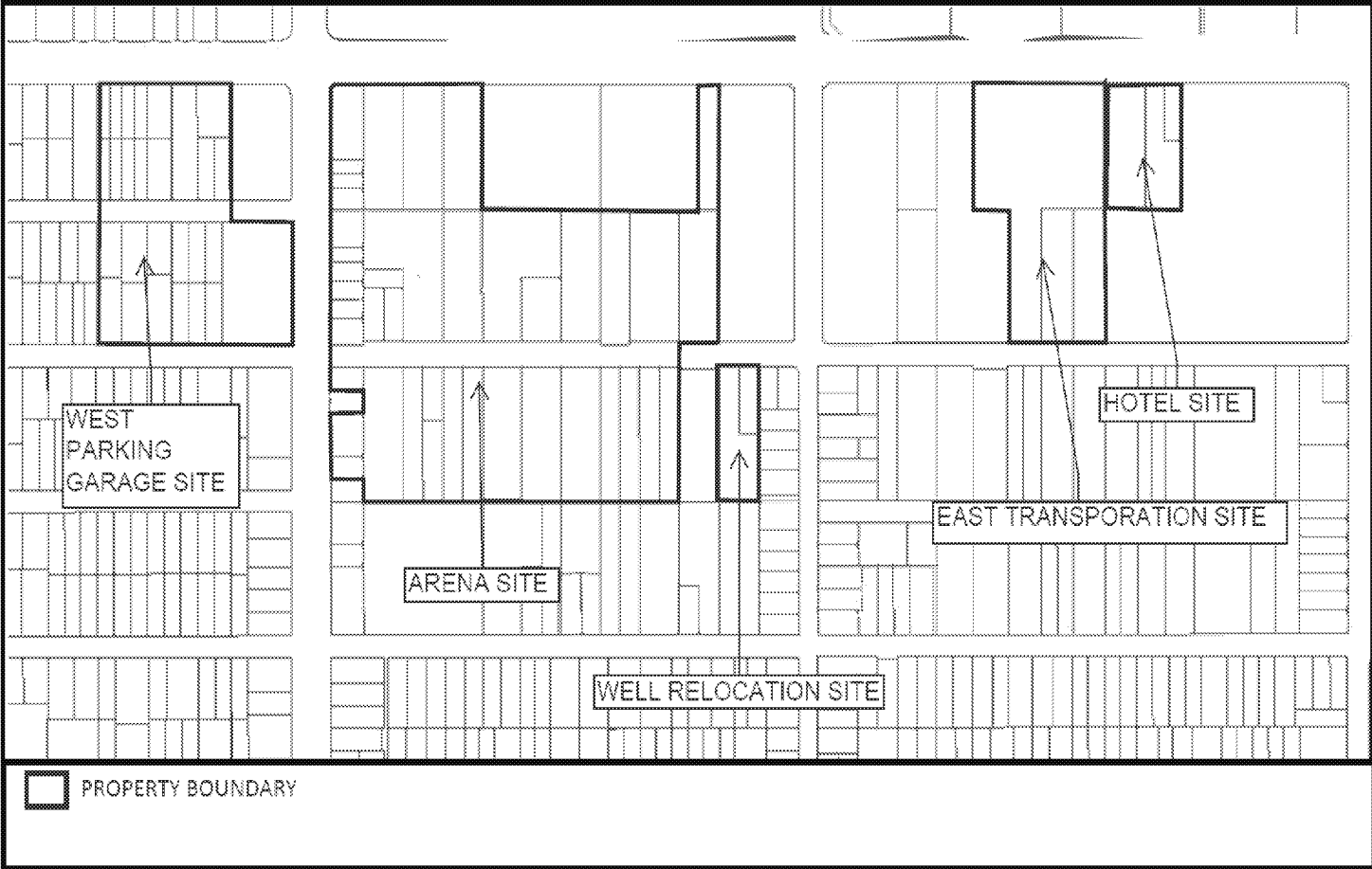
**DEVELOPMENT AGREEMENT**

**EXHIBIT LIST**

- Exhibit A - Depiction of Property
- Exhibit A-1 - City Parcels
- Exhibit A-2 - Potential Participating Parcels
- Exhibit B - List of Project Approvals
- Exhibit C - Public Benefits
- Exhibit D - Applicable Exactions
- Exhibit E - Intentionally Omitted
- Exhibit F - Conditions of Approval for Access and Maintenance of Plaza
- Exhibit G - Form of Assignment and Assumption Agreement
- Exhibit H-1 - Greenhouse Gas Emissions Condition of Approval
- Exhibit H-2 - Air Pollutant Emissions Reduction Condition of Approval
- Exhibit H-3 - TDM Program Condition of Approval

EXHIBIT A

Depiction of Property



**EXHIBIT A-1**

**City Parcels**

THE LAND IS SITUATED IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL 1:

THE WEST ONE HALF OF LOT 563 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE NORTHERLY 139.53 FEET THEREOF.

APN: 4034-004-911

PARCEL 2:

THE NORTH 139.53 FEET OF THE WEST HALF OF LOT 563 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4034-004-909

PARCEL 3:

THE WESTERLY 42.25 FEET OF LOT 562 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE NORTHERLY 139 FEET THEREOF.

APN: 4034-004-902

PARCEL 4:

THAT PORTION OF LOT 564 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWESTERLY CORNER OF SAID LOT 564; THENCE SOUTHERLY ALONG THE WESTERLY LINE OF SAID LOT, 141.03 FEET TO A POINT IN SAID WESTERLY LINE THAT IS DISTANT NORTHERLY THEREON 163.04 FEET FROM THE SOUTHWESTERLY CORNER OF SAID LOT; THENCE EAST PARALLEL WITH THE SOUTHERLY LINE OF SAID LOT, 31.56 FEET; THENCE NORTHERLY PARALLEL WITH SAID WESTERLY LINE OF SAID LOT 141.03 FEET TO A POINT IN THE NORTHERLY LINE OF SAID LOT; THENCE WESTERLY ALONG SAID NORTHERLY LINE 31.56 FEET TO THE POINT OF BEGINNING.

APN: 4034-004-907

PARCEL 5:

LOT 564 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHWESTERLY CORNER OF SAID LOT 564; THENCE NORTHERLY ALONG THE WESTERLY LINE OF SAID LOT, 163.04 FEET; THENCE EASTERLY PARALLEL WITH THE SOUTHERLY LINE OF SAID 31.56 FEET; THENCE SOUTHERLY PARALLEL WITH THE WESTERLY LINE OF SAID LOT, 163.04 FEET TO A POINT IN THE SOUTHERLY LINE OF SAID LOT; THENCE WESTERLY ALONG SAID SOUTHERLY LINE, 31.56 FEET TO THE POINT OF BEGINNING.

APN: 4034-004-900

PARCEL 6:

ALL THAT PORTION OF LOT 564 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST CORNER OF LOT 564, RUNNING THENCE IN A SOUTHERLY DIRECTION A DISTANCE OF 139.535 FEET ALONG THE EASTERLY LINE OF SAID LOT 564; THENCE WESTERLY A DISTANCE OF 31.5625 FEET PARALLEL WITH THE SOUTHERLY LINE OF SAID LOT 564; THENCE NORTHERLY A DISTANCE OF 139.535 FEET PARALLEL WITH THE EASTERLY LINE OF SAID LOT 564; THENCE EASTERLY ALONG THE NORTHERLY LINE OF SAID LOT 564 A DISTANCE OF 31.5625 FEET TO THE POINT OF BEGINNING.

APN: 4034-004-910

PARCEL 7:

THAT PORTION OF LOT 564 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE SOUTHERLY BOUNDARY OF SAID LOT 564 OF TRACT NO. 211, SAID POINT BEING 31.56 ¼ FEET WESTERLY FROM THE SOUTHEAST CORNER OF SAID LOT 564; RUNNING THENCE IN A NORTHERLY DIRECTION, A DISTANCE OF 164.535 FEET PARALLEL WITH THE EASTERLY LINE OF SAID LOT 564; THENCE WESTERLY A DISTANCE OF 31.56 ¼ FEET; THENCE SOUTHERLY ALONG THE WESTERLY LINE OF THE EAST HALF OF SAID LOT 564, A DISTANCE OF 164.535 FEET TO A POINT IN THE SOUTHERN BOUNDARY OF LOT 564; THENCE EASTERLY ALONG THE SOUTHERLY BOUNDARY OF LOT 564, A DISTANCE OF 31.56 ¼ FEET TO THE POINT OF BEGINNING.

APN: 4034-004-903

PARCEL 8:

LOT 562, TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE NORTHERLY 139 FEET OF SAID LOT. ALSO EXCEPT THEREFROM THE WESTERLY 42.25 FEET OF SAID LOT. ALSO EXCEPT THEREFROM THE EASTERLY 42 FEET OF SAID LOT.

APN: 4034-004-904

PARCEL 9:

ALL THAT PORTION OF LOT 564 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEAST CORNER OF SAID LOT 564, RUNNING THENCE IN A NORTHERLY DIRECTION A DISTANCE OF 164.535 FEET ALONG THE EASTERLY LINE OF SAID LOT 564; THENCE WEST A DISTANCE OF 31.564 FEET PARALLEL WITH THE NORTHERLY LINE OF SAID LOT 564; THENCE SOUTHERLY A DISTANCE OF 164.535 FEET TO A POINT IN THE SOUTH BOUNDARY OF SAID LOT 564; THENCE

EASTERLY ALONG THE SOUTHERLY BOUNDARY OF LOT 564, A DISTANCE OF 31.564 FEET TO THE POINT OF BEGINNING.

APN: 4034-004-901

PARCEL 10A:

THE EAST 31.56 FEET OF THE NORTH 139.57 FEET OF THE SOUTH 164.57 FEET OF LOT 563 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 10B:

THE WEST 31.56 FEET OF THE EAST 63.12 FEET OF LOT 563 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPT THEREFROM THE NORTHERLY 139.5 FEET THEREOF.

PARCEL 10C:

THE EAST 63.125 FEET OF THE NORTH 139.5 FEET OF LOT 563 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE NORTHERLY 17 FEET THEREOF.

APN: 4034-004-913

PARCEL 11:

THAT PORTION OF LOT 564 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT IN THE NORTHERLY BOUNDARY OF SAID LOT, DISTANT 31.56 ¼ FEET WESTERLY FROM THE NORTHEAST CORNER OF SAID LOT; THENCE SOUTHERLY PARALLEL WITH THE EASTERLY LINE OF SAID LOT, 139.535 FEET TO THE NORTH LINE OF LAND DESCRIBED IN DEED RECORDED IN BOOK 5284, PAGE 134 OF OFFICIAL RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY; THENCE WEST 31.56 ¼ FEET TO THE EAST LINE OF

THE WEST HALF OF SAID LOT; THENCE NORTHERLY ALONG SAID EAST LINE 139.535 FEET TO THE NORTHERLY LINE OF SAID LOT; THENCE EASTERLY ALONG SAID NORTHERLY LINE 31.56 ¼ FEET TO THE POINT OF BEGINNING.

APN: 4034-004-905

PARCEL 12:

THAT PORTION OF LOT 564 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE SOUTHERLY LINE OF SAID LOT 564, DISTANT EASTERLY THEREON 31.56 FEET FROM THE SOUTHWESTERLY CORNER OF SAID LOT; THENCE NORTHERLY PARALLEL WITH THE WESTERLY LINE OF SAID LOT, 163.04 FEET; THENCE EASTERLY PARALLEL WITH THE SOUTHERLY LINE OF SAID LOT, 31.61 FEET, MORE OR LESS, TO A POINT IN THE EASTERLY LINE OF THE WESTERLY HALF OF SAID LOT 564; THENCE SOUTHERLY ALONG SAID EASTERLY LINE AND PARALLEL WITH THE WESTERLY LINE OF SAID LOT, 163.04 FEET TO THE SOUTHERLY LINE OF SAID LOT; THENCE WESTERLY ALONG SAID SOUTHERLY LINE, 31.61 FEET, MORE OR LESS, TO THE POINT OF BEGINNING.

APN: 4034-004-906

PARCEL 13:

THE WESTERLY 84 FEET OF THE NORTHERLY 139 FEET OF LOT 562 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4034-004-912

PARCEL 14:

THAT PORTION OF LOT 564 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE NORTHERLY LINE OF SAID LOT 564 THAT IS DISTANT EASTERLY

THEREON, 31.56 FEET FROM THE NORTHWESTERLY CORNER OF SAID LOT;  
THENCE SOUTHERLY PARALLEL WITH THE WESTERLY LINE OF SAID LOT, 141.03  
FEET TO A POINT IN A LINE DRAWN PARALLEL WITH AND DISTANT NORTHERLY  
AT RIGHT ANGLES, 163.04 FEET FROM THE SOUTHERLY LINE OF SAID LOT;  
THENCE EASTERLY ALONG SAID PARALLEL LINE SO DRAWN, 31.61 FEET, MORE  
OR LESS, TO A POINT IN THE EASTERLY LINE OF THE WEST ONE-HALF OF SAID  
LOT 564; THENCE NORTHERLY ALONG SAID EASTERLY LINE AND PARALLEL  
WITH THE WESTERLY LINE OF SAID LOT, 141.03 FEET TO A POINT IN THE  
NORTHERLY LINE OF SAID LOT; THENCE WESTERLY ALONG SAID NORTHERLY  
LINE, 31.61 FEET, MORE OR LESS, TO THE POINT OF BEGINNING.

APN: 4034-004-908

PARCEL 15:

THE NORTHERLY 33 1/3 FEET OF THE SOUTHERLY 116.67 FEET OF LOT 1 OF  
LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES,  
STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN  
THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-906

PARCEL 16:

THE EAST 96 FEET OF THE SOUTH 158 FEET OF LOT 19, LOCKHAVEN TRACT, IN  
THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS  
PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE  
COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM ALL OIL,  
ASPHALTUM, PETROLEUM, NATURAL GAS AND OTHER HYDROCARBONS AND  
OTHER VALUABLE MINERAL SUBSTANCES AND PRODUCTS, AND ALL OTHER  
MINERALS, WHETHER OR NOT OF THE SAME CHARACTER HEREINBEFORE  
GENERALLY DESCRIBED IN OR UNDER SAID LAND AND LYING AND BEING AT A  
VERTICAL DEPTH OF 500 FEET OR MORE BELOW THE PRESENT NATURAL  
SURFACE OF THE GROUND, BUT WITHOUT RIGHT OF ENTRY ON THE SURFACE OR  
WITHIN A VERTICAL DEPTH OF 500 FEET BELOW THE PRESENT NATURAL  
SURFACE OF THE GROUND AS RESERVED IN A DEED RECORDED OCTOBER 25,  
1973 AS INSTRUMENT NO. 1764 OF OFFICIAL RECORDS.

APN: 4032-001-902



**PARCEL 17:**

**LOT 3 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.**

**APN: 4032-001-913**

**PARCEL 18:**

**LOT 4 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.**

**APN: 4032-001-912**

**PARCEL 19:**

**THE NORTH 41.5 FEET OF THE SOUTH 186.08 FEET OF LOT 24 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.**

**APN: 4032-001-907**

**PARCEL 20:**

**PARCEL A OF PARCEL MAP NO. 4672, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, PAGE 66 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.**

**APN: 4032-001-909**

**PARCEL 21:**

**LOT 21 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE SOUTHERLY 600 FEET AS CONDEMNED FOR RIGHT-OF-WAY EASEMENTS AND PUBLIC STREET PURPOSES IN SUPERIOR COURT CASE NO. 506**

432, RECORDED OCTOBER 23, 1985 AS INSTRUMENT NO. 85-1252150 OF OFFICIAL RECORDS.

APN: 4032-001-911

PARCEL 22:

THE NORTH 83 FEET OF THE NORTH 118 FEET OF LOT 24 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-910

PARCEL 23:

THE SOUTH 35 FEET OF THE NORTH 118 FEET OF LOT 24 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-908

PARCEL 24:

PARCEL B OF PARCEL MAP NO. 4672, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, PAGE 66 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-905

PARCEL 25:

THE NORTH 40 FEET OF THE SOUTH 144.58 FEET OF LOT 24 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-904

PARCEL 26A:

LOT 22 AND THE NORTH 125 FEET OF LOT 23 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-903

PARCEL 27:

LOT 31 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPT THEREFROM ALL OIL, GAS, MINERALS, HYDROCARBONS AND OTHER SUBSTANCES LYING IN OR UNDER OR THAT MAY BE PRODUCED FROM A DEPTH OF 500 FEET OR MORE BELOW THE SURFACE OF THE REAL PROPERTY HEREAFTER DESCRIBED, BUT WITHOUT THE RIGHT OF ENTRY UPON THE SURFACE OF SAID REAL PROPERTY FOR THE PURPOSE OF MINING, DRILLING, EXPLORING OR EXTRACTING SUCH OIL, GAS, MINERALS, HYDROCARBONS AND OTHER SUBSTANCES OR OTHER USE OR RIGHTS IN AND TO ANY PORTION OF THE SURFACE THEREOF TO A DEPTH OF 500 FEET BELOW THE SURFACE THEREOF, BUT WITH THE RIGHT TO DRILL INTO, LOCATE WELLS AND PRODUCE OIL, GAS, MINERALS, HYDROCARBONS AND OTHER SUBSTANCES FROM ANY PORTION THEREOF WHICH LIES BELOW 500 FEET FROM THE SURFACE THEREOF, AS CONVEYED TO FIRST PIONEER CO., A CALIFORNIA CORPORATION, IN DEED RECORDED JUNE 23, 1975 AS INSTRUMENT NO. 3074 OF OFFICIAL RECORDS.

APN: 4032-007-905

PARCEL 28:

THE WEST 50 FEET OF LOT 32 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-007-902

**PARCEL 29:**

THE EAST 50 FEET OF THE NORTH 150 FEET OF LOT 35 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-007-904

**PARCEL 30A:**

THE EAST HALF OF LOT 33 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-007-903

**PARCEL 31A:**

THE WEST HALF OF LOT 33 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-007-901

**PARCEL 32:**

LOT 35 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE EASTERLY 50 FEET OF THE NORTHERLY 150 FEET OF SAID LOT. ALSO EXCEPT THEREFROM ONE-HALF OF ALL OIL, GAS, MINERALS OR OTHER HYDROCARBON SUBSTANCES LYING IN OR UNDER THE HEREIN DESCRIBED LAND, AS RESERVED IN THE DEED FROM SECURITY FIRST NATIONAL BANK OF LOS ANGELES, RECORDED IN BOOK 16106, PAGE 178 OF OFFICIAL RECORDS.

APN: 4032-007-900

PARCEL 33:

THE NORTH 50 FEET OF THE SOUTH 100 FEET OF LOT 25 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-008-903

[PARCEL 34: INTENTIONALLY DELETED]

PARCEL 35:

THE WEST 50 FEET OF LOT 27 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-008-908

PARCEL 36:

LOT 30 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-008-902

PARCEL 37:

THE EAST 50 FEET OF THE NORTH 120 FEET OF LOT 27 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-008-904

PARCEL 38:

LOT 26 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-008-907

PARCEL 39:

LOT 29 OF THE LOCKHAVEN TRACT, SHEET NO. 1, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT ALL OIL, GAS, HYDROCARBONS, MINERALS AND FISSIONABLE SUBSTANCES IN AND UNDER SAID LAND, BUT WITHOUT THE RIGHT TO ENTER UPON THE SURFACE OF SAID LAND OR THE SUBSURFACE THEREOF TO A DEPTH OF 500 FEET BELOW THE SURFACE OF SAID REAL PROPERTY TO EXTRACT SAID SUBSTANCES, AS RESERVED IN DOCUMENT RECORDED MARCH 31, 1976 AS INSTRUMENT NO. 2547 OF OFFICIAL RECORDS.

APN: 4032-008-900

PARCEL 40:

THE EAST 50 FEET OF LOT 28 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-008-905

PARCEL 41:

LOT 28 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE EASTERLY 50 FEET THEREOF. ALSO EXCEPT ALL OIL, GAS, MINERALS, HYDROCARBONS AND OTHER SUBSTANCES LYING IN OR UNDER OR THAT MAY BE PRODUCED FROM A DEPTH OF 500 FEET OR MORE BELOW THE SURFACE OF THE REAL PROPERTY HEREAFTER DESCRIBED, BUT WITHOUT THE RIGHT OF ENTRY UPON THE SURFACE OF SAID REAL PROPERTY FOR THE PURPOSE OF MINING, DRILLING, EXPLORING OR EXTRACTING SUCH OIL, GAS, MINERALS, HYDROCARBONS AND OTHER SUBSTANCES OR OTHER USE

OR RIGHTS IN AND TO ANY PORTION OF THE SURFACE THEREOF TO A DEPTH OF 500 FEET BELOW THE SURFACE THEREOF, BUT WITH THE RIGHT TO DRILL INTO, LOCATE WELLS AND PRODUCE OIL, GAS, MINERALS, HYDROCARBONS AND OTHER SUBSTANCES FROM ANY PORTION THEREOF WHICH LIES BELOW 500 FEET FROM THE SURFACE THEREOF, AS CONVEYED TO FIRST PIONEER CO., A CALIFORNIA CORPORATION, IN DEED RECORDED AUGUST 01, 1975 AS INSTRUMENT NO. 4617 OF OFFICIAL RECORDS.

APN: 4032-008-901

**PARCEL 42:**

THE EAST 23.125 FEET OF THE SOUTH 139.07 FEET OF LOT 558, AND THE WEST 21 FEET OF THE SOUTH 139.07 FEET OF LOT 559 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4034-005-906

**PARCEL 43:**

THE WEST ONE-HALF OF LOT 559 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE NORTHERLY 165 FEET THEREOF. ALSO EXCEPT THEREFROM THE WESTERLY 21 FEET THEREOF.

APN: 4034-005-908

**PARCEL 44:**

THE EASTERLY 21 FEET OF THE NORTHERLY 165 FEET OF LOT 558, AND THE WESTERLY 21 FEET OF THE NORTHERLY 165 FEET OF LOT 559 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE NORTHERLY 25 FEET THEREOF.

APN: 4034-005-912

PARCEL 45:

THE NORTH 150 FEET OF THE WEST HALF OF LOT 557 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4034-005-910

PARCEL 46:

THE WEST ONE-HALF OF LOT 557 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE NORTHERLY 150 FEET THEREOF.

APN: 4034-005-902

PARCEL 47:

THE WEST 42.125 FEET OF THE EAST 63.125 FEET OF THE NORTH 165 FEET OF LOT 558 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE NORTHERLY 25 FEET THEREOF.

APN: 4034-005-911

PARCEL 48:

THE EAST ONE-HALF OF LOT 557 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE SOUTHERLY 139.50 FEET THEREOF.

APN: 4034-005-909

PARCEL 49:

THE WEST 40 FEET OF THE EAST 83.125 FEET OF THE SOUTH 139.07 FEET OF LOT 558 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES,



STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4034-005-907

PARCEL 50:

THE NORTH 165 FEET OF LOT 559 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE EASTERLY ONE-HALF THEREOF AND THE WESTERLY 21 FEET THEREOF.

APN: 4034-005-905

PARCEL 51:

THE WEST ONE-HALF OF LOT 558 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THEREFROM THE NORTHERLY 144 FEET THEREOF.

APN: 4034-005-904

PARCEL 52:

THE SOUTH 139.50 FEET OF THE EAST ONE-HALF OF LOT 557 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4034-005-903

PARCEL 53:

THE NORTH 144 FEET OF THE WEST HALF OF LOT 558 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4034-005-901

PARCEL 54A:

THE EAST 63.125 FEET OF THE SOUTH 279.07 FEET OF LOT 559 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 54B:

LOT 560 OF TRACT NO. 211, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGES 50 AND 51 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4034-005-900

PARCEL 55:

LOT 15 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-002-917

PARCEL 56:

THE WEST 73 FEET OF LOT 17 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT ALL OIL, NAPHTHA, GAS, PETROLEUM, AND OTHER MINERAL AND KINDRED SUBSTANCES, BY WHATEVER NAME OR NAMES CALLED, DEPOSITED IN, LYING UNDER, OR FLOWING THROUGH, OR THAT MAY BE PRODUCED FROM SAID LAND, TOGETHER WITH ALL RIGHTS TO EXPLORE FOR AND REMOVE THE SAME AND THE EXCLUSIVE RIGHT TO MAINTAIN SHAFTS, PIPES AND OTHER MEANS OF CONNECTION TO EXPLORE FOR AND REMOVE LIKE SUBSTANCES IN OTHER AREAS IN AND THROUGH THE SUBSURFACE OF SAID LAND, PLUS THE EXCLUSIVE RIGHT TO REMOVE LIKE SUBSTANCES IN ANY MANNER FROM OTHER AREAS IN AND THROUGH THE SUBSURFACE OF SAID LAND, INCLUDING BUT NOT BY WAY OF LIMITATION, THE SOLE AND EXCLUSIVE RIGHT TO SLANT DRILL WELLS, THE SURFACE OR MARBLEHEAD LOCATIONS OF WHICH ARE ON OTHER LANDS, IN AND THROUGH THE SUBSURFACE OF THE SAID LAND FOR THE PRODUCTION OF ANY OR ALL WATER, OIL, NAPHTHA, GAS, PETROLEUM AND OTHER MINERALS AND KINDRED SUBSTANCES, BY WHATEVER NAME OR NAMES CALLED FROM SAID LAND AND

ANY OTHER PROPERTY, WHETHER ONE PRODUCING INTERVAL OF ANY SUCH WELL IS WITHIN OR OUTSIDE OF THE SUBSURFACE OF SAID LAND, AS RESERVED BY A. J. HEATHERINGTON, INC., A CALIFORNIA CORPORATION, IN DEED RECORDED NOVEMBER 12, 1968 AS INSTRUMENT NO. 3048, IN BOOK D-4191, PAGE 694 OF OFFICIAL RECORDS.

APN: 4032-002-915

PARCEL 57:

LOT 18 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT ALL OIL, HYDROCARBON SUBSTANCES AND MINERALS OF EVERY KIND AND CHARACTER LYING MORE THAN 500 FEET BELOW THE SURFACE OF SAID LAND, TOGETHER WITH THE RIGHT TO DRILL INTO, THROUGH, AND TO USE AND OCCUPY ALL PARTS OF SAID LAND LYING MORE THAN 500 FEET BELOW THE SURFACE THEREOF FOR ANY AND ALL PURPOSES INCIDENTAL TO THE EXPLORATION FOR AND PRODUCTION OF OIL, GAS, HYDROCARBON SUBSTANCES, OR MINERALS FROM SAID LANDS BUT WITHOUT, HOWEVER, THE RIGHT TO USE EITHER THE SURFACE OF SAID LAND OR ANY PORTION OF SAID LAND WITHIN 500 FEET OF THE SURFACE FOR ANY PURPOSE OR PURPOSES WHATSOEVER, NOT PREVIOUSLY RESERVED, AS EXCEPTED AND RESERVED IN DOCUMENT RECORDED APRIL 21, 1992 AS INSTRUMENT NO. 92-699236 OF OFFICIAL RECORDS.

APN: 4032-002-916

PARCEL 58:

LOT 16 AND THE EAST 27 FEET OF LOT 17 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT ALL OIL, HYDROCARBON SUBSTANCES AND MINERALS OF EVERY KIND AND CHARACTER LYING MORE THAN 500 FEET BELOW THE SURFACE OF SAID LAND, TOGETHER WITH THE RIGHT TO DRILL INTO, THROUGH, AND TO USE AND OCCUPY ALL PARTS OF SAID LAND LYING MORE THAN 500 FEET BELOW THE SURFACE THEREOF FOR ANY AND ALL PURPOSES INCIDENTAL TO THE EXPLORATION FOR AND PRODUCTION OF OIL, GAS, HYDROCARBON SUBSTANCES OR MINERALS FROM SAID OR OTHER LANDS, BUT WITHOUT, HOWEVER, THE RIGHT TO USE EITHER THE SURFACE OF SAID LAND OR ANY PORTION OF SAID LAND WITHIN 500 FEET OF THE SURFACE FOR ANY PURPOSE OR PURPOSES WHATSOEVER, NOT PREVIOUSLY RESERVED, AS

EXCEPTED AND RESERVED IN DEED RECORDED MAY 16, 1991 AS INSTRUMENT NO. 91-715443 OF OFFICIAL RECORDS.

APN: 4032-002-914

PARCEL 59:

LOT 28 IN BLOCK 10 OF TRACT NO. 2464, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGE 3 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPT ALL OIL, GAS, HYDROCARBON SUBSTANCES AND MINERALS OF EVERY KIND AND CHARACTER LYING MORE THAN 500 FEET BELOW THE SURFACE OF THE PROPERTY DESCRIBED HEREIN, TOGETHER WITH THE RIGHT TO DRILL INTO, THROUGH, AND TO USE AND OCCUPY ALL PARTS OF SAID PROPERTY LYING MORE THAN 500 FEET BELOW THE SURFACE THEREOF FOR ANY AND ALL PURPOSES INCIDENTAL TO THE EXPLORATION FOR AND PRODUCTION OF OIL, GAS, HYDROCARBON SUBSTANCES OR MINERALS FROM SAID PROPERTY OR OTHER LANDS, BUT WITHOUT, HOWEVER, THE RIGHT TO USE EITHER THE SURFACE OF SAID PROPERTY OR ANY PORTION OF SAID PROPERTY WITHIN 500 FEET OF THE SURFACE FOR ANY PURPOSE OR PURPOSES WHATSOEVER, BY FINAL CONDEMNATION, CASE NO. BC 002 446, RECORDED SEPTEMBER 27, 1993 AS INSTRUMENT NO. 93-1880751 OF OFFICIAL RECORDS.

APN: 4032-003-915

PARCEL 60A:

LOTS 5, 6 AND 29 IN BLOCK 10 OF TRACT NO. 2464, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGE 3 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 60B:

LOTS 7 AND 8 IN BLOCK 10 OF TRACT NO. 2464, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGE 3 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 60C:

LOT 9 AND THE WESTERLY 22 FEET OF LOT 10 IN BLOCK 10 OF TRACT NO. 2464, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS

PER MAP RECORDED IN BOOK 27, PAGE 3 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-003-914

PARCEL 61:

LOT 27 IN BLOCK 10 OF TRACT NO. 2464, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGE 3 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-003-912

PARCEL 62:

THE SOUTH 104.58 FEET OF LOT 24 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPTING ALL OIL, GAS AND OTHER HYDROCARBON SUBSTANCES IN AND UNDER ALL OF THE REAL PROPERTY, BUT WITHOUT ANY RIGHT TO PENETRATE, USE OR DISTURB THE SURFACE OF SAID PROPERTY OR ANY PORTION OF SAID PROPERTY WITHIN FIVE HUNDRED (500) FEET OF THE SURFACE THEREOF, AS RESERVED BY FREDERICK W. STOOPS AND GERTRUDE M. STOOPS IN DEED RECORDED MARCH 30, 1984 AS INSTRUMENT NO. 84-386190 OF OFFICIAL RECORDS.

APN: 4032-001-900; 4032-001-901

PARCEL 63:

THE EAST HALF, FRONT AND REAR, OF LOT 10 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-002-913

PARCEL 64:

THE EAST 50 FEET OF LOT 10 AND THE SOUTHERLY 152.04 FEET OF LOT 11, BLOCK 10 OF TRACT NO. 2464, IN THE CITY OF INGLEWOOD, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGE 3 OF

MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPTING THEREFROM THE EASTERLY 33 FEET OF THE SOUTHERLY 152.04 FEET OF LOT 11 BY DEED RECORDED SEPTEMBER 4, 1985, AS INSTRUMENT NO. 85-1021209, OFFICIAL RECORDS OF SAID COUNTY. ALSO EXCEPT THEREFROM ALL OIL, GAS, HYDROCARBON, SUBSTANCES AND MINERALS OF EVERY KIND AS RESERVED IN DEED RECORDED FEBRUARY 28, 1985 AS INSTRUMENT NO. 85-229983, OF OFFICIAL RECORDS OF SAID COUNTY.

APN: 4032-004-913

PARCEL 65:

THE NORTH HALF OF LOT 11 IN BLOCK 10 OF TRACT NO. 2464, IN THE CITY OF INGLEWOOD, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PE MAP RECORDED IN BOOK 27, PAGE 3 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPTING THEREFROM THE EASTERLY 33 FEET OF THE NORTHERLY 152.04 FEET OF SAID LAND BY DEED RECORDED SEPTEMBER 4, 1985, AS INSTRUMENT NO. 85-1021209, OFFICIAL RECORDS. ALSO EXCEPT THEREFROM ALL OIL GAS, HYDROCARBON SUBSTANCES AND MINERALS OF EVERY KIND AS RESERVED IN DEED RECORDED FEBRUARY 28, 1985, AS INSTRUMENT NO. 85-229983, OFFICIAL RECORDS OF SAID COUNTY.

APN: 4032-004-914

**EXHIBIT A-2**

**Potential Participating Parcels**

THE LAND IS SITUATED IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL 1:

LOT 1 OF THE LOCKHAVEN TRACT IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, RECORDS OF SAID COUNTY. EXCEPTING THEREFROM THE SOUTHERLY 116.67 FEET THEREOF.

APN: 4032-001-039

PARCEL 2:

LOT 2 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPTING THEREFROM ALL OIL, GAS, MINERALS AND OTHER HYDROCARBON SUBSTANCES IN AND UNDER SAID LAND BELOW A DEPTH OF 500 FEET FROM THE SURFACE THEREOF, WITHOUT ANY RIGHT OF SURFACE ENTRY, AS RESERVED BY ROBERT KING SMIGEL AND SUZAN K. SMIGEL, HUSBAND AND WIFE, AS TO AN UNDIVIDED FOUR-FIFTHS INTEREST; ALVIN WEINSTEIN, AN UNMARRIED MAN, AS TO AN UNDIVIDED ONE-FIFTH INTEREST, BY DEED RECORDED MARCH 5, 1974 AS INSTRUMENT NO. 901 IN BOOK D6190, PAGE 241 OF OFFICIAL RECORDS.

APN: 4032-001-049

PARCEL 3:

THE NORTH 33 1/3 FEET OF THE SOUTH 83 1/3 FEET OF LOT 1 OF THE LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17 PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-005

**PARCEL 4:**

THE SOUTH FIFTY (50) FEET OF LOT 1 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-006

**PARCEL 5:**

THE SOUTH 46 FEET OF THE NORTH 171 FEET OF LOT 23 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, AS PER MAP RECORDED IN BOOK 17 PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-033

**PARCEL 6:**

PARCEL 1 OF PARCEL MA NO. 21391, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 226 PAGE(S) 86 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-001-048

**PARCEL 7:**

THE NORTH 54.04 FEET OF LOT 25 OF TRACT LOCKHAVEN, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE(S) 87, OF MAPS IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-008-001

**PARCEL 8:**

**PARCEL A:**

THE NORTH 50 FEET OF THE SOUTH 200 FEET OF LOT 25 OF LOCKHAVEN TRACT, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP



RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

**PARCEL B:**

THE NORTH 50 FEET OF THE SOUTH 150 FEET OF LOT 25 OF LOCKHAVEN TRACT, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN(s): 4032-008-035

**PARCEL 9:**

THE SOUTHERLY 184.09 FEET OF THE EAST ONE HALF OF LOT 27 OF LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, AS PER BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4032-008-034

**PARCEL 10:**

THE EAST 50 FEET OF LOT 32, LOCKHAVEN TRACT, IN THE CITY OF INGLEWOOD, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17, PAGE 87 OF MAPS, IN THE OFFICE OF THE L.A. COUNTY RECORDER.

APN(s): 4032-007-035

**EXHIBIT B**

**List of Project Approvals**

- A. Resolution No. \_\_\_\_\_, certifying the FEIR, adopting findings and a statement of overriding considerations for significant and unavoidable impacts of the Project, and adopting a Mitigation Monitoring and Reporting Program (MMRP);
- B. Resolution No. \_\_\_\_\_, amending the General Plan's Land Use, Circulation (Transportation) and Safety Elements;
- C. Resolution No. \_\_\_\_\_, amending the Inglewood International Business Park Specific Plan (IIBPSP) to exclude the Property from IIBPSP requirements if developed in connection with the Project;
- D. Ordinance No. \_\_\_\_\_ (Zoning Code Amendment), establishing regulations for the Sports and Entertainment Overlay Zone and adjusting other land use controls;
- E. Ordinance No. \_\_\_\_\_ (Zone Change), establishing a Sports and Entertainment Overlay Zone and rezoning certain parcels within the Property;
- F. Resolution No. \_\_\_\_\_, adopting the Sports and Entertainment Complex Design Guidelines and Infrastructure Plan (SEC Development Guidelines);
- G. Ordinance No. \_\_\_\_\_, adopting amendments to Chapters 2, 3, 5, 10, and 11 of the Inglewood Municipal Code;
- H. Ordinance No. \_\_\_\_\_, approving the Development Agreement between the City of Inglewood and Murphy's Bowl LLC; and
- I. This Development Agreement.

## EXHIBIT C

### **Public Benefits**

Subject to the terms of the Agreement, the development of the Project will provide the City, its residents, and the surrounding region with the Public Benefits listed in Section 1 through Section 22 below. These Public Benefits are public benefits in excess of those otherwise having a nexus to the Project and beyond what could be expected from the Project in absence of the Agreement. Capitalized terms used in this Exhibit C and not otherwise defined herein shall have the meanings assigned to them in the Agreement.

### **Creation of Local Jobs & Workforce Equity**

1. **Minority/Disadvantaged Business Enterprises Participation Goals.** In the development of the Project, Developer shall require that all construction contractors have a goal to achieve participation by minority/disadvantaged business enterprises (the "**MBE/DBEs**") 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, as more fully set forth in the DDA.

2. **Local Employment Opportunities.** Events at the Arena will result in additional employment opportunities for Inglewood residents and businesses. Developer, as the owner of the Arena, shall engage in the following 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 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**"): (i) upon commencement of a job search, publication of employment opportunities once each week in a newspaper of general circulation in Inglewood for at least 3 weeks (unless the job is filled sooner), and (ii) utilization of the resources and networks of the WOCP (as defined in Section 4 of this Exhibit) to identify and solicit qualified Inglewood residents. The obligations of Developer and its Event Operations Providers with respect to this goal shall be satisfied by engaging in the following activities: (i) utilization of the WOCP to identify and solicit qualified Inglewood residents; (ii) coordination with organizations such as the South Bay Workforce Investment Board, to identify and solicit qualified Inglewood residents; and (iii) funding (by Developer only) and participation in job fairs as provided in Section 3 of this Exhibit. This paragraph does not apply to Developer's contractors, subcontractors, and vendors providing services other than in connection with events held inside the Arena.

3. **Job Fairs.** Developer shall contribute a maximum of \$150,000 over the lifetime of the Project in order to fund at least 4 job fairs and related advertising and promotion for those job fairs. At least one job fair shall take place 3 months prior to the commencement of construction of the Project, with the second job fair to take place no later than six months prior to the first ticketed event held after the opening of the Arena. All job fairs shall be open to the general public and include information about available employment opportunities, as well as opportunities to submit resumes and applications. Developer shall publish notice of each jobs

fair once each week in a newspaper of general circulation in Inglewood for 3 weeks prior to that job fair.

4. **Workforce Outreach Coordination Program.** In consultation with the City, Developer shall fund a Workforce Outreach Coordination Program (the "**WOCP**") in the aggregate amount of \$600,000, over a period of 4 years, starting from the Effective Date. Funding for the WOCP shall include the costs of outreach and marketing, and the retention of a qualified Workforce Outreach Coordinator. Developer shall hire a local qualified Workforce Outreach Coordinator for the construction period, and shall 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 Developer-owned and other retail operations at or around the Arena. The Workforce Outreach Coordinator shall 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 this Exhibit C. The overall objectives and goals of the WOCP shall include: (i) establishing strategic community outreach partners with existing organizations such as community organizations, churches, and state and local resources; (ii) partnering with community organizations to facilitate intake and assess potential job training candidates; (iii) building working relationships with contractors, religious organizations, local political leaders and other local organizations; (iv) working with contractors to estimate the number of employment opportunities and required skills; and (v) monitoring efforts by contractors as required in this Section 4. In furtherance of these objectives, the Workforce Outreach Coordinator shall also coordinate with existing organizations, which offer employment and training programs for Inglewood residents, such as the South Bay Workforce Investment Board and other similar organizations so that the expertise of that organization is matched with the particular Project need, it being recognized that the needs of the Project and the available organizations will change over time.

5. **Job Training for Inglewood Residents.** Developer shall contribute \$250,000, over a period of 5 years commencing on the Effective Date, to fund programs, managed by the South Bay Workforce Investment Board or similar organization(s) selected by Developer, that will provide job skills to Inglewood residents entering the job market.

6. **Construction Opportunities for the Formerly Incarcerated.** Developer shall contribute a total of \$150,000, over a period of 3 years commencing on the Effective Date, to fund job placement programs for formerly incarcerated individuals in the building and construction trades. Funds shall be contributed to one or more community based nonprofit organizations ("**CBOs**"), shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

7. **Project Labor Agreement for Project Construction.** A large labor pool will be required to execute the work involved in the development of the Project. Towards that end,

Developer'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 are 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.

8. **Leased Space to Inglewood Restaurant.** Developer shall 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. If the restaurant space has not been leased to a qualified Inglewood business within one year of its availability, after good faith efforts to do so, the restaurant space shall be made available for lease to the general market.

### **Commitments to Affordable Housing & Renter Support**

9. **Funding for Affordable Housing.** Developer shall contribute, over the period from the Effective Date to the date 10 years following the issuance of the Certificate of Occupancy for the Arena, up to \$75,000,000 to a fund or program, managed by a Community Development Financial Institution or a similar organization selected by Developer (a “**CDFI**”), 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. The term "affordable housing" shall mean housing deemed affordable to persons or families whose household incomes are either at or below the median household income for Los Angeles County. The CDFI shall establish guidelines for the administration of the fund or program, subject to the approval of the Developer. Developer's obligations with respect to this paragraph shall be satisfied by contributing each year amounts required for affordable housing projects meeting the guidelines and project criteria established for the program, up to a maximum of \$45,000,000 in any particular year and to a maximum of \$75,000,000 in total. Amounts received from loan repayments may, at the option of Developer, be reinvested in the program or returned to Developer.

10. **First-Time Homeowners Assistance.** Developer shall contribute a total of \$2,500,000, over a period of 5 years commencing one year prior to the estimated issuance of the Certificate of Occupancy for the Arena, 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. Down-payment assistance may be structured as a recoverable grant to be repaid and recycled when a property is resold. Funds shall be contributed to one or more CBOs, government agencies, or similar organizations, shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

11. **Emergency Support to Inglewood Renters and Anti-Eviction Services.** Developer shall contribute a total of \$3,000,000, over a period of 5 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. Funds shall be contributed to one or more non-profits, government agencies, or similar organizations, shall be

restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

12. **Capacity Building for Housing-Focused Non-Profits.** Developer shall 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.). Funds shall be contributed to one or more CBOs, shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

**Rehabilitation of Inglewood Public Library &  
Creation of Community Center**

13. **Rehabilitation of Library and Creation of Community Center.** Developer shall contribute to the City a total of \$6,000,000 to rehabilitate the City's Public Library as a library and community center, where members of the community can gather for group activities, social support, public information, and other purposes. Such funds shall be contributed within 60 days following the later of (i) issuance of the Certificate of Occupancy for the Arena, (ii) City approval of a plan for such rehabilitation, or (iii) demonstration by the City, to the reasonable satisfaction of Developer, that other funds are available to complete the rehabilitation. If the foregoing conditions have not been met after 3 years following the issuance of the Certificate of Occupancy for the Arena, the City may propose an alternative project for receipt and expenditure of such funding, subject to Developer's reasonable approval, to further similar purposes.

**Support for Inglewood Youth and Education**

14. **After School Tutoring for Inglewood Students.** Developer shall contribute a total of \$4,000,000, over a period from the Effective Date to the date 5 years following the issuance of the Certificate of Occupancy for the Arena, for after school tutoring programs for Inglewood students. Funds shall be contributed to one or more CBOs, shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

15. **Youth Innovation and Design Camps.** Developer shall contribute a minimum of \$500,000, over the period from the Effective Date to the date 5 years following the issuance of the Certificate of Occupancy for the Arena, for purposes of developing and operating coding, science, technology, and engineering camps and programs for Inglewood students. Funds shall be contributed to one or more CBOs, shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

16. **Keeping Inglewood Students in School.** Developer shall contribute a minimum of \$2,750,000, over the period from the Effective Date to the date 5 years following the issuance of the Certificate of Occupancy for the Arena, for purposes of discouraging Inglewood high school students from dropping out of school. Funds shall be contributed to one or more CBOs, shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

17. **Opening Pathways to College for Inglewood Students.** Developer shall contribute up to \$1,000,000, over a period from the Effective Date to the date 5 years following the issuance of the Certificate of Occupancy for the Arena, for purposes of expanding counseling services and support for students seeking a post-secondary education. Funds shall be contributed to one or more CBOs shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

18. **College Scholarships for Inglewood Students.** Developer shall contribute a minimum of \$4,500,000, over the period from the Effective Date to the date 5 years following the issuance of the Certificate of Occupancy for the Arena, 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. Funds shall be contributed to one or more CBOs or similar organizations, shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

#### **Support for Inglewood Seniors**

19. **Resources for Inglewood Seniors.** Developer shall contribute a total of at least \$500,000, over a period from the Effective Date to the date 5 years following the issuance of the Certificate of Occupancy for the Arena, to fund social and educational programs at the Inglewood Senior Center. Funds shall be contributed to one or more CBOs, shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

#### **Improving Inglewood Parks**

20. **Renovating Public Basketball Courts.** Developer shall contribute \$300,000, over a period from the Effective Date to the date 5 years following the issuance of the Certificate of Occupancy for the Arena, to renovate public basketball courts in Inglewood. Funds shall be contributed to one or more government agencies or CBOs, shall be restricted to the purposes set forth in this paragraph, and shall be subject to administrative and program guidelines approved by Developer.

#### **Community Engagement & Collaboration**

21. **Use of Arena for Charitable Causes.** Upon the City's issuance of the Certificate of Occupancy for the Arena, Developer shall provide City, local schools, youth athletic programs, or a local community-based charitable organization designated by the City (each a "**Community Group**") use of the Arena for up to 10 days per calendar year (each a "**Community Event**"), on days that the Arena or surrounding facilities are available. Any use of the Arena that is not a major sporting event typically held in an arena or stadium shall be subject Developer's approval. Community Events shall not exceed a one-day period unless otherwise approved in writing by Developer, which shall not be unreasonably withheld, conditioned, or delayed. Community Events shall not be designed to earn a profit or otherwise compete with the operations or booking opportunities of the Arena as determined by Developer in its sole discretion. There shall be no more than 2 Community Events in each calendar month. The purpose of this provision is to allow the community reasonable access to the Arena and

surrounding facilities. Developer shall provide such use of the Arena and surrounding facilities at no cost to the Community Group; *provided, however*, that each such Community Group shall procure event insurance, indemnify Developer for liability arising out of the Community Group's use of the Arena and bear the actual out-of-pocket expenses as reasonably required and incurred by Developer in connection with the usage of the Arena or surrounding facilities, including but not limited to security, food and beverage (if utilized), insurance, clean-up and trash removal, ushers, ticket-takers, and stagehands (the "**Event Expenses**"). The Community Group shall not charge an admittance fee or set ticket prices or secure sponsorship or grants in excess of the good faith estimated amounts necessary for the Community Group to recoup the Event Expenses; *provided, however*, that notwithstanding the foregoing, a Community Group will not be in violation of this section if actual ticket sales exceed the estimated amount of ticket sales. The Community Group and Developer shall enter into a rental agreement that shall govern the Community Event. Developer shall provide an estimate of the expected Event Expenses for the Community Group's review and approval prior to entering into any rental agreement. Developer shall also consult with the City regularly regarding any changes to such estimate. The rental agreement shall contain the Developer's then-current standard terms and conditions that the Arena requires of all users, including but not limited to the material terms that are listed on Exhibit C-1. The obligation of Developer under this paragraph shall not apply during any times a Permitted Delay is in effect, during any times that the Arena is closed for material renovations or repairs, or if, subject to the provisions of the Public Use Restriction, the Arena is no longer being operated as contemplated in this Agreement.

22. **Access to NBA Games for Community Groups.** Following the City's issuance of the Certificate of Occupancy for the Arena, Developer shall 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.



EXHIBIT C-1

FORM OF COMMUNITY EVENT RENTAL AGREEMENT

**TICKETING:** Developer or Developer's ticketing agent will make all ticket sales for a Community Event, and such ticket sales will be subject to facility fee and convenience charges.

**RENT:** Developer will not charge Community Group any fee for the use of the Arena or surrounding facilities (collectively, the "Arena") for any Community Event.

**EXPENSES AND SETTLEMENT:**

- Developer and Community Group shall agree in advance and in writing as to the requirements and the budget for any Community Event (the "Budget"). Community Group will be responsible for reimbursing Developer for all expenses and costs incurred in connection with the Community Event for such personnel, services, equipment, and/or materials that Developer deems to be reasonably required based on the Community Event requirements described in the Budget (the "Community Event Expenses"). Community Event Expenses for labor will be subject to any applicable union minimum requirements and will include full reimbursement for Developer's wage, fringe benefit, payroll tax, and other labor-related expenses associated with the Community Event (and Community Event Expenses for goods or services rented or purchased from a third party will be at the actual costs incurred by Developer). Community Event Expenses will be paid by Community Group to Developer at the conclusion of each Community Event, unless Developer requests Community Group to pay reasonably estimated Community Event Expenses prior to the Community Event.
- During the end of any Community Event or at another mutually agreed time, the parties will conduct a financial accounting and settlement of the Community Event Expenses where the amounts owed to each party in respect of the Community Event will be reconciled and paid, if applicable.

**INDEMNITY:** The rental agreement will include indemnification provisions consistent with the following:

- Community Group will indemnify, defend, and hold harmless Developer, and their owners and partners and all of their respective parent and affiliated entities, whether direct or indirect, and all directors, officers, employees, agents, licensees, contractors, and successors and assigns of any of the foregoing (collectively, the "Affiliates"), as well as any parties appearing in the Community Event (collectively the "Indemnified Parties"), from and against any and all claims, liabilities, losses, damages, judgments, settlement expenses, costs and expenses whatsoever, including court costs, attorneys' fees and related disbursements, whether incurred by Developer in actions involving third parties or in actions against Community Group for claims (individually, a "Loss" and collectively, the "Losses") arising out of or in connection with: (i) the breach by Community Group of any of its agreements or covenants under the rental agreement; (ii) the truthfulness of its representations and warranties under the rental agreement; (iii) the conduct and

presentation of the Community Event; and (iv) the use of the Arena, or any part thereof, in connection with the conduct/presentation of the Community Event, or any preparation for or move-in or move-out of the Community Event, including areas utilized by guests attending the Community Event, escalators, elevators, stairs, seating areas, lavatories, restaurant and concession areas and all areas and facilities utilized for ingress and egress of guests. Without limiting the foregoing, Community Group will defend, indemnify, and hold harmless the Indemnified Parties for any damage to the Arena, whether caused by Community Event participants, production personnel, patrons or otherwise. All repairs to the damaged property of Developer will be made by firm(s) designated by Developer. The charges for such services will not exceed the charges generally prevailing for comparable services.

**INSURANCE:** Community Group will maintain at its expense insurance in connection with any Community Event acceptable to Developer (and consistent with Developer's requirements under its standard rental agreements for the Arena). As requested by Developer, Community Group will deliver to Developer certificates satisfactory to Developer evidencing such insurance and naming Developer and its Affiliates and such other parties reasonably requested by Developer as additional insureds.

**OTHER:** The parties will enter into a rental agreement for each Community Event consistent with these terms and conditions and including such other representations, warranties, covenants, terms and conditions contained in Developer's standard rental agreements for the Arena.

Moreover, the rental agreement shall contain Developer's then-current standard terms and conditions that the Arena offers to third party users; provided however, all such terms and conditions, including any indemnity or insurance obligations of the Community Group, shall be consistent with and subject to the principles of this Exhibit and California law.

**EXHIBIT D**

**Applicable Exactions**

1. Public Art For New Construction (Inglewood Municipal Code ("IMC") § 11-141), as set forth in Section 7.3.3 of this Agreement
2. Parking Tax (IMC § 9-19), as set forth in Section 7.2.2 of this Agreement
3. Admissions Tax (IMC § 9-6), as set forth in Section 7.2.1 of this Agreement
4. Gross Receipts Tax (IMC § 8-23)
5. Utility Users Tax (IMC § 9-69)
6. Nonresidential Construction Tax (IMC § 9-123)
7. Real Property Transfer Tax (IMC § 9-42), as set forth in Section 7.2.5 of this Agreement

**EXHIBIT E**

**Intentionally Omitted**

**EXHIBIT F**

**Conditions of Approval for Access and Maintenance of Plaza**

1. Commitments for Plazas. Developer shall record a covenant specifying the area of a publicly accessible plaza and that such area is for the use, enjoyment, and benefit of the public, which shall be operated in accordance with the conditions set forth herein for the life of the Arena. The building permit application for the Plaza shall show where the Plaza may be located. Subject to approval of a revised building permit application, the area and configuration of the Plaza may be modified from time to time consistent with the requirements of the SEC Design Guidelines. The Plaza shall include a variety of amenities which may include landscape, hardscape, benches and other seating areas, architectural and directional signage, passive recreation (e.g., water fountains, kiosks with items for sale, stages for entertainment, other seasonal entertainment, seating areas for restaurant dining and service of alcohol in specified areas), and a recreational basketball court. Designated portions of the Plaza may be used for outdoor restaurants or food and beverage areas in accordance with the Project Approvals.

2. Maintenance Standard. The Plaza shall be operated, managed, and maintained in a neat, clean, attractive and safe condition in accordance with the intended use thereof.

3. Hours of Operation. The Plaza shall be open and accessible to the public, at a minimum, between 9:00 a.m. and sunset, 7 days per week, except as provided herein or as approved in writing by the City. Developer, in its sole discretion, may close or restrict access to the Plaza as required to accommodate any Special Events (as defined below) or temporary closing in the event of an emergency or to undertake repairs or maintenance, as further described below. The Plaza may be open for employees, invitees, or guests at times when it is closed to the general public. No Person shall enter, remain, stay or loiter on the Plaza when it is closed to the public, except Persons authorized in conjunction with Special Events, or temporary closures as permitted or authorized service and maintenance personnel.

4. No Discrimination. Developer covenants that there shall be no discrimination against, or segregation of, any Person, or group of Persons, on account of race, color, religion, creed, national origin, gender, ancestry, sex, sexual orientation, age, disability, medical condition, marital status, acquired immune deficiency syndrome, acquired or perceived, in the use, occupancy, tenure, or enjoyment of the Plaza.

5. Temporary Closure and Special Events.

(a) Emergencies and Repairs. Developer shall have the right, without obtaining the consent of the City or any other Person, to temporarily close the Plaza, or to limit access to specifically authorized Persons, at any time and from time to time for any one or more of the following:

(i) In the event of an emergency, or danger to the public health or safety created from whatever cause (e.g., flood, storm, fire, earthquake, explosion, accident, criminal activity, riot, civil disturbances, civil unrest or unlawful assembly), Developer may temporarily close the Plaza (or affected portions thereof) for the duration thereof, in any manner

deemed necessary or desirable to promote public safety, security, and the protection of Persons and property.

(ii) Developer may temporarily close the Plaza (or applicable portion thereof) to repair or maintain the Plaza, as Developer may deem necessary or desirable, and during such times as may be necessary to perform such repairs or maintenance.

(b) Special Events. Developer shall have the right, without obtaining the consent of the City or any other Person, to temporarily close all or portions of the Plaza to the public for a period of up to 24 consecutive hours (or such longer period as may be required in order to comply with security standards and best practices, including without limitation those adopted by the NBA) in connection with ticketed events at the Arena or the use of the Plaza for private events, such as promotional events, private parties, weddings, celebrations, receptions, and assemblies (collectively, "Special Events"). The City acknowledges that before, during, and after Special Events, including all NBA games, access to the Plaza may be restricted to ticketed attendees of the event. Security screening for Special Events is planned to take place at the perimeter of the Plaza, or at other locations as Developer deems desirable, such that access to the Plaza may be limited to ticketed attendees of the event and personal property may be restricted in accordance with security standards and best practices, including without limitation those adopted by the NBA.

(c) Public Events. Developer may establish reasonable content-neutral rules and regulations for the use of the Plaza, including uses in connection with parades, gatherings, and assemblies that do not require the closure of the Plaza to the public (collectively, "Public Events").

6. Arrest or Removal of Persons. Developer shall have the right (but not the obligation) to use lawful means to effect the arrest or removal of any Person or Persons who create a public nuisance, who otherwise violate the applicable rules and regulations, or who commit any crime including, without limitation, infractions or misdemeanors in or around the Plaza.

7. Removal of Obstructions. Developer shall have the right to remove and dispose of, in any lawful manner it deems appropriate, any object or thing left or deposited on the Plaza deemed to be an obstruction, interference, or restriction of use of the Plaza for the purposes set forth in this Exhibit, including, but not limited to, personal belongings or equipment abandoned on the Plaza during hours when public access is not allowed consistent with this Exhibit.

8. Project Security During Periods of Non-Access. Developer shall have the right to block off the Plaza or any portion thereof, and to install and operate security devices and to maintain security personnel to prevent the entry of Persons or vehicles during the time periods when public access is not allowed consistent with this Exhibit.

9. Temporary Structures. No structure of a temporary character, trailer, tent, shack, barn, or other outbuilding shall be used on any portion of the Plaza at any time, either temporarily or permanently, unless such structure is approved by Developer, provided that

Developer may permit the use of temporary tents, booths, and the like in connection with Public Events or Special Events.

10. Signs. Developer shall post on-site Project signs at the major public entrances of the Plaza setting forth applicable regulations permitted by this Exhibit, hours of operation, and a telephone number to call regarding security, management, or other inquiries.

11. Limitation on Other Uses. The use of any portion of the Plaza by the public or any Person for any purpose or period of time shall not be construed, interpreted, or deemed to create any rights or interests to or in the Plaza. The ability of the public or any Person to use the Plaza or any portion thereof shall not be an implied dedication or create any third party rights or interests. The Developer expressly reserves the right to control the manner, extent and duration of any such use consistent with the terms hereof.

**EXHIBIT G**

**Form of Assignment and Assumption Agreement**

THIS DOCUMENT WAS PREPARED BY,  
AND AFTER RECORDING RETURN TO:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Space Above for Recorder's Use)

**ASSIGNMENT AND ASSUMPTION OF  
DEVELOPMENT AGREEMENT**

THIS ASSIGNMENT AND ASSUMPTION OF DEVELOPMENT AGREEMENT ("Assignment") is made as of [\_\_\_\_], by and between MURPHY'S BOWL LLC, a Delaware limited liability company ("Assignor"), and [\_\_\_\_], a [\_\_\_\_] ("Assignee"), with reference to the following facts:

A. Assignor owns certain real property and certain improvements located thereon, known as [\_\_\_\_], located at [\_\_\_\_] in the City of Inglewood, California (the "Property"), more particularly described in **Exhibit G-1** attached hereto and incorporated herein by this reference.

B. The City of Inglewood, a municipal corporation ("City"), and Assignor entered into that certain Development Agreement dated [\_\_\_\_], (the "DA"), recorded on [\_\_\_\_] as Instrument No. [\_\_\_\_] in the Official Records of the Los Angeles County, California.

C. Assignor and Assignee have entered into that certain Purchase and Sale Agreement dated [\_\_\_\_] (the "Purchase Agreement") whereby a portion of the Property will be sold to Assignee (the "Assigned Property") as identified and described in **Exhibit G-2** attached hereto and incorporated herein by this reference.

D. Assignor desires to assign and transfer to Assignee, and Assignee desires to assume, all of Assignor's right, title, and interest as the Developer under the DA with respect to the Assigned Property subject to the terms and conditions of this Assignment.

NOW THEREFORE, in consideration of the foregoing facts and the mutual covenants and conditions below, it is agreed:

1. Assignor assigns and transfers to Assignee, all of Assignor's right, title and interest accruing to the Developer under the DA as to the Assigned Property, subject to the terms, covenants and restrictions set forth in the DA.



2. Assignee shall assume all of the obligations under the DA as to the Assigned Property and observe and fully perform all of the duties and obligations of Assignor under the DA as to the Assigned Property, and to be subject to the terms and conditions thereof, it being the express intention of both Assignor and Assignee that, upon execution of this Assignment and conveyance of the Property to the Assignee, Assignee shall become substituted for Assignor as "Developer" and "Party" under the DA as to the Assigned Property and the Assignor shall be unconditionally and irrevocably released therefrom as to the Assigned Property from and after the date hereof consistent with the terms and conditions of this Assignment.

3. Assignor warrants and represents to Assignee that Assignor has full right and authority to make this Assignment and vest in Assignee the rights, interests, powers, and benefits hereby assigned.

4. Assignee warrants and represents to Assignor that Assignee has full right and authority to execute this Assignment.

5. This Assignment is expressly conditioned upon the closing of the transaction contemplated in the Purchase Agreement.

6. This Assignment is not intended as a mortgage or security device of any kind.

7. Notwithstanding anything to the contrary contained herein, the assumption by Assignee of any obligations pursuant to this Assignment is not, and shall not be construed to be, for the benefit of Assignor, and under no circumstances shall Assignor or any affiliate of Assignor have any liability to Assignee with respect to such assumed obligations or otherwise.

8. This Assignment may be executed in counterparts which taken together shall constitute one and the same instrument.

9. The provisions of this instrument shall be binding upon and inure to the benefit of Assignor and Assignee and their respective successors and assigns.

10. Assignor and Assignee covenants that it will, at any time and from time to time, execute any documents and take such additional actions as the other, or its respective successors or assigns, shall reasonably require in order to more completely or perfectly carry out the transfers intended to be accomplished by this Assignment.

11. This Assignment shall be construed and interpreted in accordance with the laws of the State of California.

[SIGNATURE PAGES TO FOLLOW]

IN WITNESS WHEREOF, Assignor and Assignee have executed this Assignment as of the date first set forth above.

**"ASSIGNOR"**

**MURPHY'S BOWL LLC,**  
a Delaware Limited liability company

\_\_\_\_\_  
Name:  
Title:

**"ASSIGNEE"**

[ \_\_\_\_\_ ]

\_\_\_\_\_  
Name:  
Title:

ACKNOWLEDGED AND AGREED:  
"CITY" [IF REQUIRED]

**CITY OF INGLEWOOD,**  
a municipal corporation

By: \_\_\_\_\_  
\_\_\_\_\_, Mayor

**ATTEST:**

By: \_\_\_\_\_  
City Clerk

**APPROVED AS TO FORM:**

By: \_\_\_\_\_  
City Attorney

**APPROVED:**

By: \_\_\_\_\_  
City Special Counsel

EXHIBIT G-1  
TO  
ASSIGNMENT AND ASSUMPTION OF  
DEVELOPMENT AGREEMENT  
LEGAL DESCRIPTION OF THE PROPERTY

Real property in the County of Los Angeles, State of California, described as follows:

EXHIBIT G-2  
TO  
ASSIGNMENT AND ASSUMPTION OF  
DEVELOPMENT AGREEMENT

LEGAL DESCRIPTION OF THE ASSIGNED PROPERTY

Real property in the County of Los Angeles, State of California, described as follows:

**EXHIBIT H-1**

**Greenhouse Gas Emissions Condition of Approval**

In accordance with California Public Resources Code Section 21168.6.8(j), Mitigation Measures 3.7-1(a) and 3.7-1(b) as set forth in the MMRP, and in addition to otherwise being provided for in the Agreement, the Project shall comply with the following condition of approval:

Developer shall comply with Mitigation Measure 3.7-1(a), as set forth in the MMRP, including the preparation of a GHG Reduction Plan. The GHG Reduction Plan shall include implementation of all measures set forth under Section 2.A of Mitigation Measure 3.7-1(a), Project Design Features 3.2-1 and 3.2-2 as identified in the FEIR, and Mitigation Measures 3.2-2(b) and 3.14-2(b) as set forth in the MMRP.

The GHG Reduction Plan shall also include implementation, by the end of the first NBA regular season or June of the first NBA regular season, whichever is later, during which an NBA team has played at the Arena, of all Mitigation Measures set forth in the MMRP that are specific to the operation of the Arena, and of 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 3 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 the exception of the hotel, with a goal of reducing landfill waste to zero. Effectiveness of the program shall be monitored annually through the U.S. Environmental Protection Agency's WasteWise program or a similar reporting system.
- *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 shall 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 Operation 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.

Developer shall submit documentation that the on- and off-site measures identified above have been implemented to the City, with copies provided to the California Air Resources Board.

Developer shall 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 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, verifiable, real, and enforceable and shall meet all requirements for carbon offset credits set forth in Mitigation Measure 3.7-1(a). Contracts to purchase carbon offset credits for construction emissions shall be entered into prior to the issuance of grading permits, and contracts to purchase carbon offset credits for operational emissions shall be entered into prior to the issuance of the final certificate of occupancy for the Project. Copies of the contracts will promptly be provided to the California Air Resources Board, the Governor's Office, and the City.

Developer shall comply with Mitigation Measure 3.7-1(b), as set forth in the MMRP, including the preparation of an Annual GHG Verification Report, which may be submitted to the City concurrently with the annual review of compliance with the Development Agreement and/or with the submittal of the annual Transportation Demand Management Program monitoring report to the City Traffic Engineer. The annual Development Agreement review shall include a review of compliance with Public Resources Code Section 21168.6.8(a)(3)(B).

**EXHIBIT H-2**

**Air Pollutant Emissions Reduction Condition of Approval**

The Project shall comply with the following condition of approval, with respect to which City staff have consulted with the South Coast Air Quality Management District ("SCAQMD"):

Developer shall 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 consistent with emission reduction measures that may be identified for those communities pursuant to Section 44391.2 of the Health and Safety Code.

These measures shall achieve reductions of a minimum of 400 tons of oxides of nitrogen ("NO<sub>x</sub>") and 10 tons of PM<sub>2.5</sub>, as defined in Section 39047.2 of the Health and Safety Code, over 10 years following the commencement of construction of the Project. Of these amounts, reductions of a minimum of 130 tons of NO<sub>x</sub> and 3 tons of PM<sub>2.5</sub> shall be achieved within the first year following commencement of construction of the Project. The reductions required pursuant to this paragraph are in addition to any other requirements imposed by other laws.

If Developer can demonstrate and verify to SCAQMD that it has invested at least \$30,000,000 to achieve the requirements of this condition of approval, the requirements of this condition shall be deemed met, so long as one-half of the reductions set forth above (i.e., reductions of 200 tons of NO<sub>x</sub> and 5 tons of PM<sub>2.5</sub> over ten years following the commencement of Project construction, of which reductions a minimum of 65 tons of NO<sub>x</sub> and 1.5 tons of PM<sub>2.5</sub> shall be achieved within the first year following commencement of Project construction) are met.

Greenhouse gas emissions reductions achieved under this condition of approval shall count toward Developer's obligations set forth under Exhibit H-1, Greenhouse Gas Emissions Condition of Approval.

**EXHIBIT H-3**

**TDM Program Conditions of Approval**

Developer shall comply with Mitigation Measures 3.7.1(a) and 3.14-2(b), as set forth in the MMRP, providing for the preparation and implementation of a Transportation Demand Management Program (TDM Program) that would include strategies, incentives, and tools to provide opportunities for non-event employees and patrons as well as event attendees and employees to reduce single-occupancy vehicle trips and to use other modes of transportation besides automobile to travel to basketball games and other events hosted at the Project.

Mitigation Measures 3.7.1(a) and 3.14-2(b) require that the TDM Program include certain requirements identified in the Measures as TDM 1 through TDM 9 (the "TDM Program Elements"). For example, TDM 2 requires that the TDM Program provide for connectivity to the existing and future Metro Rail Stations and take advantage of the transportation resources in the area. Initially, this is contemplated to be achieved by implementation of a dedicated shuttle service the "IBEC Shuttle Service"), using an estimated 27 shuttles with a capacity of 45 persons per shuttle, from the Green Line at Hawthorne Station, Crenshaw/LAX Line at AMC/96th Station, and Crenshaw/ LAX Line at Downtown Inglewood station.

The Mitigation Measures also require the TDM Program to include an ongoing program to monitor each of the TDM Program Elements. 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. 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 may be submitted to the City Traffic Engineer concurrently with the annual review of compliance with the Development Agreement and shall also be provided to the State of California Office of Planning and Research (through 2030).

In addition, in accordance with California Public Resources Code Section 21168.6.8(k), the TDM Program will meet certain minimum requirements (the "AB987 TDM Requirements"), generally described as follows:

- (i) upon full implementation, the TDM Program 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 TDM Program;
- (ii) to accelerate and maximize vehicle trip reduction, each measure in the TDM Program shall be implemented as soon as feasible, so that no less than 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 Arena;



(iii) a 15% reduction in vehicle trips shall be achieved and maintained as soon as possible, but not later than January 1, 2030. The applicant shall verify achievement to the lead agency and the Office of Planning and Research; and

(iv) if the applicant fails to verify achievement of the reduction require by clause (iii), the TDM Program shall be revised to include additional feasible measures to reduce vehicle trips by 17%, or, if there is a rail transit line with a stop within 0.25 miles of the arena, 20%, by January 1, 2035.

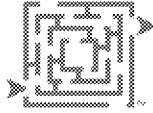
The TDM Program is expected to be revised and refined as monitoring is performed, experience is gained, additional information is obtained regarding the Project transportation characteristics, and advances in technology or infrastructure become available. Changes to the TDM Program are subject to review and approval by the City Traffic Engineer to ensure that the TDM Program, as revised, is equally or more effective in addressing the TDM Program Elements.

With the annual monitoring report, or within 60 days following the submission of the monitoring report, either the Developer or the City Traffic Engineer may also, in consultation with the other, propose revisions or refinements to the TDM Program. Any such revisions or refinements to the TDM Program shall (i) take into account the monitoring results as well as advances in technology or infrastructure, including any expanded public transit capacity, that may become available, (ii) be equally or more effective in addressing the TDM Program Elements and the AB 987 TDM Requirements in a cost efficient manner. Revisions and refinements of the TDM Program proposed by the Developer shall be subject to the approval of the City Traffic Engineer consistent with the foregoing standards. Revisions and refinements of the TDM Program proposed by the City Traffic Engineer shall be subject to the approval of the Developer consistent with the same standards. Developer and City specifically acknowledge that in the future there may be an effort to expand public transit in the vicinity of the Project site, including increased connectivity between the Project and Metro Stations. Should that occur, the City and Developer specifically acknowledge that it may be appropriate, to the extent consistent with the standards for revision and refinement of the TDM Program set forth above, to shift TDM resources, such as resources that would otherwise be devoted to operation of the IBEC Shuttle Service, estimated in the amount of \$1.5 to \$2.5 million annually, to support operation of expanded public transit providing equally, or more effective connectivity between the Project and Metro Stations. At the request of the City, Developer agrees to negotiate in good faith with respect to the terms of a separate agreement that would shift TDM resources, to the extent consistent with the standards set forth above for revisions and refinements of the TDP Program, so as to provide a reliable source of funding for the operation of such expanded public transit capacity.

City Council Staff Report

Attachment 16:

Keyser Marston & Associates Peer Review Report



KEYSER MARSTON ASSOCIATES  
ADVISORS IN PUBLIC/PRIVATE REAL ESTATE DEVELOPMENT

## MEMORANDUM

ADVISORS IN:  
Real Estate  
Affordable Housing  
Economic Development

BERKELEY  
A. Jerry Keyser  
Timothy C. Kelly  
Debbie M. Kern  
David Doezeema  
Kevin Feeney

LOS ANGELES  
Kathleen H. Head  
James A. Rabe  
Gregory D. Soo-Hoo  
Kevin E. Engstrom  
Julie L. Romey  
Tim R. Bretz

SAN DIEGO  
Paul C. Marra

**To:** Christopher E. Jackson, Director  
Inglewood Economic & Community Development Department

**From:** James Rabe, CRE

**Date:** June 10, 2020

**Subject:** Peer Review – Economic and Fiscal Impact Report: Inglewood Basketball and Entertainment Center

At your request Keyser Marston Associates, Inc. (KMA) has reviewed the Economic and Fiscal Impact Report: Inglewood Basketball and Entertainment Center prepared by HR&A Advisors (Report). The Report was prepared in support of the proposed development of a new entertainment venue in the City of Inglewood (City) that would house the Los Angeles Clippers and would provide another large-scale entertainment venue in Los Angeles County similar to Staples Center and the Forum. This peer review focuses on the fiscal impact analysis in the Report.

### BACKGROUND

Murphy's Bowl, LLC (Developer) has proposed the development of the Inglewood Basketball and Entertainment Center (IBEC) to enable the relocation of the Los Angeles Clippers from Staples Center to the City of Inglewood. The site is located on approximately 27 acres of land on the south side of West Century Boulevard between Yukon Avenue on the east and Freeman Avenue on the west. 103<sup>rd</sup> Street forms the southern boundary.

The project description contemplates:

- 18,500 seat arena,
- 85,000 square foot practice and training facility,
- 71,000 square feet of team office space,
- 25,000 square foot sports medicine clinic,
- Up to 15,000 square feet of community serving space,
- Up to 15,000 square feet of full-service restaurant space,
- Up to 33,000 square feet of retail space,
- 150-room (key) hotel, and
- 4,125 space parking structure

The Report evaluates the maximum buildout on the site and in Appendix D considers both a smaller buildout and lesser activity at the arena (Reduced Development).

## **APPROACH**

KMA has reviewed the Report and compared the methodology and assumptions with similar reports prepared by KMA and other consultants for both large- and small-scale projects. KMA has reviewed its research for other projects related to employment by use, spending and sales productivity for various uses and development costs for projects. KMA has reviewed City budgets for the current year and the past several years to confirm estimates in the Report. Finally, KMA has reviewed the relevant appendices of the IBEC's environmental impact report (EIR).

HR&A has estimated economic and employment impacts using the IMPLAN model. IMPLAN is one of the two input-output models used in estimating economic and employment impacts for projects.<sup>1</sup> While KMA has some differences in the estimation of project employment, those differences would make almost no difference in the estimation of economic and employment impacts.

## **ANALYSIS**

KMA has focused on the fiscal analysis components of the Report. This portion of the Report focuses on the impact of the project on the budget of the City. As is typical of

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<sup>1</sup> The Regional Industrial Multiplier System (RIMS) is the other.

fiscal impact reports, HR&A focuses on the General Fund portion of the budget. The overall City budget also includes a number enterprise funds or special purpose funds. These are not considered, as they have specified funding sources (e.g. user fees or special tax) and expenditures are tied to those revenues.

KMA has reviewed the maximum buildout concept and the Reduced Development or “downside” version of the Project presented in Appendix D. It is KMA’s opinion that maximum buildout scenario presents an optimistic version of the project, while the downside version presents a pessimistic version of the Project. However, the analysis in the Report does provide reasonable upper and lower bounds for evaluating the fiscal impact on the City. This will be discussed further in Results and Conclusions.

It is KMA’s understanding that the development agreement for IBEC includes a provision for Developer to reimburse the City for additional costs incurred on event days. As a result, such costs and reimbursements were not included in the Report and are not addressed here.

## **Public Revenues**

The Report provides a detailed breakout and explanation of the public revenue projections. The two primary revenue sources to the City are the traditional property tax allocation and the property tax allocation to replace VLF funds. The Report estimates the assessed valuation of the completed IBEC at nearly \$959 million. This is consistent with news reports and is slightly less than the current assessed value of the new Warriors Arena complex in San Francisco. Together these two property taxes amount to nearly \$2.7 million annually, which represents nearly 45% of the total general fund revenues. The difference in property taxes between the IBEC and the Reduced Development alternative is approximately \$40,000.

As discussed in the Report, the two alternatives differ in their assumptions regarding the number of events that are considered “new” in the City and the amount of retail space built at the facility. The proposed project includes 33,000 square feet of “plaza dining and retail space”. The Reduced Development alternative only includes 7,500 square feet in this category.

KMA agrees with the methodology and computations used in the Report to compute the rest of the public revenues except for transient occupancy tax. HR&A utilizes an 80%

occupancy rate which represents the rate published in a recent CBRE report. However, this rate is above the long-term averages and the occupancy rate assumed by hotel developers when they are underwriting a project. Therefore, KMA utilized a 75% occupancy rate, which is consistent with hotel developer pro formas for this type of hotel product. The KMA projection reduces public revenues in both alternatives by approximately \$66,000.

As shown in the Summary Table, KMA's estimate of total annual public revenues amounts to \$5.99 million for the IBEC and \$5.39 million for the Reduced Development alternative.

### **Public Expenditures**

KMA generally agrees with the methodology that is in the Report. However, KMA utilizes a slightly different approach and assumptions in evaluating the public expenditures associated with the project. KMA's estimate of public expenditures is shown in Table 1. The three areas where the KMA approach differs from HR&A relates to:

- Inclusion of City overhead costs
- Computation of resident equivalents
- Estimate of onsite employment

The Report has not included any allowance for costs associated with departments that are usually considered the overhead departments.<sup>2</sup> These departments had a budget cost of approximately \$24.6 million in the 2019 budget. The standard approach in most fiscal analyses is to assume the 50% of the overhead accounts are variable costs, which are affected by the development. KMA has included this cost in its review.

The second difference is in the computation of resident equivalents. The resident equivalent approach recognizes that a city budget is affected by both the resident population and the business population. The general methodology is that the 100% of the local population is counted as a resident for this purpose and employees/workers are counted as 50% of a person. The lower ratio for employees recognizes that employees are only in the city for part of the day and part of the week. HR&A has

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<sup>2</sup> The first eight lines of the city budget beginning with Mayor & City Council and ending with Finance.

reduced the “resident” population factor for the time that they are working out of the City. Likewise, they reduce the worker percentage from 50% to approximately 30% based on the time spent in the City. We have not seen this approach used by any other consulting firm. The Report notes that current population is 110,598. Total employment in the City per ESRI Business Analyst is 29,685. By the traditional formula, total resident equivalents is equal 125,440.<sup>3</sup>

Finally, HR&A has utilized assumptions from IBEC to estimate the employment at the project. KMA has utilized general published employment factors, data from project EIRs and data from proprietary surveys of projects. KMAs employment estimates and factors are shown in Table 2.

## RESULTS AND CONCLUSIONS

As shown in the Table 1, the total expenditures using the KMA methodology amount to \$1,423,377 for the IBEC and \$1,367,436 for the Reduced Development alternative. The KMA estimates are approximately \$60,000 greater than the estimate in the Report. The difference for the Reduced Development is similar, a \$78,000 difference. These differences are small, approximately 4.0% to 5.0% for the two alternatives.

The Report projected an annual net fiscal benefit of \$4.5 million to the City from the IBEC. As shown in the Summary Table, KMA projects a \$4.38 million net benefit, which is very similar to the Report. The result is similar for the Reduced Development Alternative. The Report projects a net benefit of \$3.97 million. The KMA analysis projects a \$3.8 million net benefit.

As noted at the beginning of this memorandum KMA believes that the fiscal analysis using the IBEC assumptions is overly optimistic and the Reduced Development alternative is overly pessimistic. This has to do with the estimates of the number of non-basketball events at the arena. Using the IBEC assumptions all 78 events are assumed to be new to the City. As HR&A acknowledges in Appendix D, the Stone Report only projects 29 new events in the region, much less the City. The Reduced Development alternative uses only the 29 new events as the basis for its projections. This is likely low as some of the other events at the Arena will likely be transfers from Staples Center, so these are also net new events in the City. Based on that, KMA

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<sup>3</sup> This amount is used in Table 1.

believes that the two alternatives evaluated represent reasonable upper and lower bounds for the fiscal impact of the project.

These projections assume full buildout of a project, either the full IBEC proposal or the Reduced Development alternative. Nearly all of the development is under the control of the Developer, however, the hotel is expected to be developed by others. If the hotel is not developed, then public revenues will be significantly reduced, but expenditures will only be reduced slightly. That is a risk to the City, which is not typically addressed in a fiscal impact report. If the hotel is not built the net reduction in revenues to the City approximately \$1.0 million.

In addition, property taxes represent nearly 45% of the public revenues to be received by the City. Given the importance of this revenue source it may be appropriate for the City to require a minimum level of assessed value at project completion as part of the development agreement.

Attachments



## SUMMARY TABLE

### FISCAL IMPACT SUMMARY IBEC PROJECT INGLEWOOD, CALIFORNIA

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	<u>Full Buildout</u>	<u>Reduced Development</u>
<b>Fiscal Revenues</b>		
Property Tax	\$1,342,478	\$1,321,924
MVLF in Lieu	1,356,267	1,335,501
Business License Tax	279,815	231,880
Admissions Tax	784,274	566,439
Utility Users Tax	237,555	236,606
Sales Tax	712,407	488,511
Transient Occupancy Tax	954,293	954,293
Parking Tax	<u>325,804</u>	<u>255,129</u>
Total Annual Revenues	\$5,992,893	\$5,390,283
<b>Existing Uses and Service Costs</b>		
Net Benefit of Existing Uses <sup>1</sup>	(\$192,529)	(\$192,529)
City Service Costs (Incl OH) <sup>2</sup>	<u>(1,423,377)</u>	<u>(1,367,436)</u>
Total Annual Uses and Costs	<u>(1,615,906)</u>	<u>(1,559,965)</u>
<b>NET FISCAL IMPACT</b>	<b>\$4,376,987</b>	<b>\$3,830,318</b>

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1. Per HR&A

2. See Table 1

**TABLE 1****FISCAL EXPENSES  
IBEC PROJECT  
INGLEWOOD, CALIFORNIA**

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	<u>Full Buildout</u>	<u>Reduced Development</u>
Departments		
Police	\$68,178,686	
Fire	14,971,090	
Public Works	59,220,408	
Parks, Rec Community	12,401,568	
Overhead Departments @ 50%	<u>12,306,779</u>	
Total	\$167,078,531	
Resident Equivalents <sup>1</sup>	125,440	
Cost per Resident Equivalent	\$1,332	\$1,332
Project Resident Equivalents <sup>2</sup>	1,069	1,027
<b>Total Fiscal Cost</b>	<b>\$1,423,377</b>	<b>\$1,367,436</b>

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1. See memorandum text on page 5.

1. See Table 2.

**TABLE 2**

**ESTIMATE OF RESIDENT EQUIVALENTS  
IBEC PROPOSED AND REDUCED PROJECT  
INGLEWOOD, CALIFORNIA**

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<b>Proposed Project</b>	<b>Rooms or Sq. Ft.</b>	<b>Emp. Per SF or Room</b>	<b>Employees</b>	<b>Resident Equivalent @ 50%</b>
Hotel Visitors <sup>1</sup>				90
Arena Spectators <sup>1</sup>				590
Arena Workers <sup>1</sup>				42
Clippers Team Office <sup>2</sup>	71,000	300	237	119
Clippers Practice Facility <sup>3</sup>	85,000	1,500	57	29
Sports Medicine Clinic <sup>2</sup>	25,000	300	83	42
Community Space <sup>2</sup>	15,000	300	50	25
Restaurants <sup>4</sup>	15,000	200	75	38
Retail <sup>2</sup>	33,000	300	110	55
Hotel Workers <sup>5</sup>	150	0.50	75	<u>38</u>
<b>Total Resident Equivalents</b>				<b>1,069</b>
<b>Reduced Project</b>				
Hotel Visitors <sup>1</sup>				90
Arena Spectators <sup>1</sup>				590
Arena Workers <sup>1</sup>				42
Clippers Team Office <sup>2</sup>	71,000	300	237	119
Clippers Practice Facility <sup>3</sup>	85,000	1,500	57	29
Sports Medicine Clinic <sup>2</sup>	25,000	300	83	42
Community Space <sup>2</sup>	15,000	300	50	25
Restaurants <sup>4</sup>	15,000	200	75	38
Retail <sup>2</sup>	7,500	300	25	13
Hotel Workers <sup>5</sup>	150	0.50	75	<u>38</u>
<b>Total Resident Equivalents</b>				<b>1,027</b>

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1. Per HR&A methodology

2. KMA estimates based on ESRI Business Analyst, US Green Business Council and project EIRs

3. KMA estimate

4. KMA estimate base on restaurant industry reports, ESRI Business Analyst

5. KMA estimate. Hotel employment estimates range from 0.4 to 0.9 employees per room.