



2600 Capitol Avenue
Suite 200
Sacramento, CA 95816
916.564.4500 phone
916.564.4501 fax

esassoc.com

memorandum

Date July 21, 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 Communications Received on July 21, 2020

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 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 decided, however, to provide responses to those comments. The responses to comments provided through July 13, 2020 was included in the City's staff report on July 17, 2020.

This memorandum includes responses to comments submitted on July 21, 2020, before the close of the public hearing, that 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, at the public hearing.

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.

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 8:00am on July 21, 2020.

**TABLE 1
LATE COMMENT LETTERS RECEIVED REGARDING THE PROPOSED IBEC PROJECT ON JULY 21, 2020**

Letter #	Entity	Author(s) of Comment Letter/e-mail	Date Received	Author Submitted Comment Letter on the Draft EIR
1	The Silverstein Law Firm	Robert Silverstein	July 21, 2020 1:55pm	

Responses to Comment Letters Received

The July 21, 2020 letter from Robert Silverstein of the Silverstein Law Firm addressed a number of issues, as discussed below:

- Several pages of discussion assert that the range of alternatives included in the EIR is inadequate. These issues have been thoroughly addressed in the EIR, including in the Draft EIR, the Final EIR, a technical memorandum by ESA dated June 12, 2020, a memorandum of May 7, 2020 from AECOM to the project applicant, in the CEQA Findings, and elsewhere in the record.
- The letter asserts that the EIR improperly failed to identify event day mitigation that would avoid the potential for concurrent events at the IBEC Project, The Forum, and or Sofi Stadium. This issue was explored by the City and such mitigation was determined to be infeasible. The issue was thoroughly addressed in the Final EIR. See Final EIR Responses to Comment Channel-25 and Channel-26.
- The letter asserts that items are presented for approval that were not reflected in the EIR. The ordinance amending Inglewood Municipal Code chapters outside of Chapter 12 was included in the list of Project Actions in the Final EIR, page 2-12. The Final EIR was presented for public review on June 4, 2020, prior to the Planning Commission hearing recommending certification, contrary to the commenter’s suggestions. Any suggestion that this constitutes “piecemealing” is without merit.
- The letter asserts that the City’s Citywide Permit Parking Ordinance is part of, and was improperly piecemealed from, the IBEC Project. This issue has been previously raised and addressed by the City. The independent utility of the Citywide Parking Permit Program Ordinance was explained, and the lack of improper piecemealing was addressed in Response to Comment Silverstein-17.
- The letter asserts that the City has illegally piecemealed the Project from the Inglewood Transportation Management Community Services District (ITMCSD). The ITMCSD is related to the City’s Inglewood Transit Connector project, and would only be connected to the IBEC Project if the IBEC Project is approved. It would otherwise serve The Forum and Sofi Stadium, and does not require, nor is required by, the IBEC Project. The issue of piecemealing of the IBEC Project from other nearby venues and projects is addressed in the memorandum from ESA to the City on July 16, 2020, in Response to

Comment Silverstein-41. Further, questions of precommitment of the City to the IBEC Project has been previously addressed in the same memorandum, in Responses to Comments Silverstein 6, 18, and 44.

- The comment states that the EIR does not analyze the Transportation Demand Management (TDM) program. This is not correct. The TDM program is described and analyzed in Section 3.14 of the EIR.
- The letter asserts that the Inglewood/LAX shuttle program is in some way related to the IBEC shuttle program. This is incorrect. The Inglewood/LAX shuttle program is the result of a settlement agreement reached years ago between the City and LAX related to LAX expansion.
- The EIR lists all anticipated approvals for the Project, and not all of those approvals are on the City Council’s agenda for July 21, 2020. The General Plan Amendments which would reflect the anticipated vacation of the streets do not, in and of themselves, effectuate a street vacation. As the commenter notes, there is a separate process for vacating streets that is required under the Streets and Highways Code, which the City would be required to follow in order to effectuate any street vacation.
- The letter asserts that the GHG mitigation required in the EIR (MM 3.7-1(a) and (b)) is inadequate. The City has considered the content of the measure carefully, and continued to refine the mitigation measure, in particular, to ensure that the measures are permanent, additional, quantifiable, real, verifiable, and enforceable through the use of offset credits that meet Standards, Protocols, and Methodologies. This is addressed in a technical memorandum from ESA to the City of July 21, 2020, and in the MMRP.
- The letter asserts that the City inadequately considered the health effects of the Project on the population of the City of Inglewood. This was thoroughly addressed in the Final EIR in Response to Comment NRDC-7 and in the Draft EIR’s analysis of air quality impacts.
- The letter asserts that Administrative Recorded documents have not been properly uploaded to the City’s ibecproject.com website. The City has rigorously uploaded documents on a weekly and daily basis since the publication of the Draft EIR. There have been no undue delays in the availability of Administrative Record comments that have limited the ability of the public to meaningfully review and comment on the content of the Administrative Record.
- The letter asserts that the EIR inadequately disclosed the properties to be acquired as part of the Proposed Project. DEIR Figure 2-3, on page 2-8 (cited by the commenter) shows 10 privately owned parcels that are within the Project Site, with white crosshatching. The commenter’s statement that the DEIR “disclosed only 6 [private] properties” is incorrect. The quoted statement used by the commenter refers only to the six properties that are neither vacant nor underdeveloped. All six of those properties are privately owned. There are four additional privately owned properties, which are vacant or undeveloped, as shown in Figure 2-3. The EIR provided clear description of the Project Site and the physical environmental effects of acquisition and development of the Project Site. The issue of whether the parcels are privately or publically owned does not affect the physical environmental effects of the Project as described in the EIR.

Analysis and Conclusion

We have reviewed all of the correspondence received on July 21, 2020 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.