

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7

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March 22, 2018

Ms. Mindy Wilcox  
City of Inglewood  
One West Manchester Blvd., 4<sup>th</sup> Floor  
Inglewood, CA 90301

RE: Inglewood Basketball and  
Entertainment Center  
Vic. LA-405/ PM 22.23, LA-105/PM R3.62  
SCH # 2018021056  
GTS # LA-2018-01359-NOP

Dear Ms. Wilcox:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed Project consists of an arena designed to host the LA Clippers basketball team with up to 18,000 fixed seats for National Basketball Association (NBA) games and up to 500 additional temporary seats for events such as family shows, concerts, conventions, and corporate events, and non-LA-Clippers sporting events. The Project would include an approximately 85,000 square foot team practice and athletic training facility; 55,000 square feet of LA Clippers team office space; an approximately 25,000-square foot sports medicine clinic for team and potential general public use; approximately 40,000 square feet of retail and other ancillary uses that would include community and youth-oriented space. The Project may include the development of approximately 100 to 120-room hotel.

This letter is a follow up to a phone conversation on March 16, 2018 between the City and Caltrans staff. The project consultant (Trifiletti Consulting, Inc.) hired by the City has reached out to Caltrans recently. Both agencies agree that a Formal Scoping Meeting to discuss the preparation of the traffic analysis, potential traffic impacts, and proposed mitigation on the State facilities is necessary. Please contact this office to schedule a meeting.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

The Department also seeks to provide equitable mobility options for people who are economically, socially, or physically disadvantaged. Therefore, we ask the Lead Agency to evaluate the project site for access problem, VMT and service needs that may need to be addressed.

The project boundary is within 5,000 feet radius to the State facilities on I-405 and I-105. Along with the new football stadium and commercial and retail land uses one block away from the Project, many trips from both projects would use the same State facilities. Please provide trip generation, trip distribution, and trip assignment estimates for this project with regards to the local and regional road system including state facilities. To ensure that queue formation does not create traffic conflicts, project-generated trips should be added to the existing and future scenario traffic volumes for the NB/SB I-405 on/off-ramps to/from W Century Blvd. and EB/WB I-105 on/off-ramps at Crenshaw Blvd., at Prairie Ave., and at Hawthorne Blvd. To avoid traffic conflicts such as inadequate weaving distances, queue spilling back onto the freeway (queuing analysis), and uneven lane utilization, please analyze the adequacy of the operations of freeway segments in the vicinity of the project.

Analysis should include existing traffic, traffic generated by the project assigning to the State facilities, cumulative traffic generated from all specific planning developments in the area, and traffic growth other than from the project and developments.

A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts should be included in the traffic analysis. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:  
<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

In the absence of an adopted precise plan, the Lead Agency should identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable modes shares, thereby reducing VMT. The Lead Agency should also consider fair share fees for shuttles that use the public curb space.

Please analyze VMT resulting from the proposed project. With the enactment of Senate Bill (SB) 743, Caltrans is focusing on VMT as the primary transportation impact metric. Please ensure that the travel demand analysis includes:

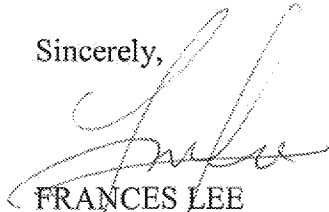
- A vicinity map, regional location map, and site plan clearly showing project access. Ingress and egress for all project components should be clearly identified. Clearly identify the State ROW. Project driveways, local roads and intersections, car/bike parking, and transit facilities within the study area should be mapped and described in text.
- A VMT analysis pursuant to the City's guidelines or, if the City has no guidelines, then please use the Office of Planning and Research's Draft Guidelines. Projects that result in automobile VMT per capita greater than 15% below existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential safety issues for all road users should be identified and fully mitigated.
- The project's primary and secondary effects on pedestrians, bicycles, disabled travelers and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

- The DEIR should determine if there is adequate storage capacity available for the turning movements at the intersections and the freeway off-ramps noted above, in order to determine whether or not the queues spill back onto the freeway mainline.

We request that an analysis of the project's impacts and mitigation include information regarding the City's local impact fee program. The analysis should include improvements to pedestrian, bicycle, safety improvements to the State facilities, and transit infrastructure or TDM mitigation measures. If no such fee exists, we would like to explore with the City the establishment of local VMT-based transportation impact fee program.

If you have any questions, please feel free to contact me at (213) 897-0673 and refer to GTS # LA-2018-01359-NOP.

Sincerely,



FRANCES LEE  
IGR/CEQA Acting Branch Chief

cc: Scott Morgan, State Clearinghouse