March 20, 2018

Mindy Wilcox, AICP
Planning Manager
City of Inglewood, CA
Economic and Community Development Department
Planning Division
One West Manchester Boulevard
4th Floor
Inglewood, CA 90301


Dear Ms. Wilcox:

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report and Public Scoping Meeting for the Inglewood Basketball and Entertainment Center located in the City of Inglewood. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency’s statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

The Inglewood Basketball and Entertainment Center is proposed by Murphy’s Bowl LLC, a private applicant, and would consist of an arena designed to host the LA Clippers basketball team with up to 18,000 fixed seats for National Basketball Association (NBA) games. The arena could also be configured with up to 500 additional temporary seats for events such as family shows, concerts, conventions and corporate events, and non-LA Clippers sporting events. In addition, the Proposed Project would include an approximately 85,000-square foot team practice and athletic training facility; approximately 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; an outdoor plaza with an approximate site area of 260,000 square feet including landscaped areas, outdoor
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basketball courts, and outdoor community gathering space; and parking facilities sufficient to meet the needs of the proposed uses.

Metro Comments

Transit Coordination to Project Site

In 2016, a Task Force was established to examine various recommendations to facilitate better transit options to Inglewood's future entertainment/stadium district. The Task Force looked at various improvements including first/last mile connections, improved bus service from nearby rail stations at Downtown Inglewood (CLAX Line) and Hawthorne/ Lenox Station (Green Line), targeted transit marketing during games and special events. In addition, Metro prepared a Focused Analysis of transit connection to Inglewood’s future entertainment/stadium district, in the role of a Consultant to the City of Inglewood. The Study explored how to connect Inglewood’s future entertainment/stadium district to Metro's rail system via a high-capacity transit connection.

The City of Inglewood is currently exploring additional studies that will build upon the Focused Analysis and will select one or more potential independent transit options to clear the Project option(s) through the appropriate CEQA process.

Bus Operations

Metro bus lines 117, 211/215, and 212/312 operate on West Century Boulevard and South Prairie Avenue, adjacent to the proposed Project. One Metro bus stop on West Century Boulevard and one bus stop on South Prairie Avenue are directly adjacent to the proposed Project. The following comments relate to bus operations and the adjacent bus stops:

1. The Project sponsor should be aware of the bus facilities and services that are present and that transit services are likely to be expanded in the future to provide connections to the existing Green Line and Crenshaw/LAX Line. With an anticipated increase in traffic during and after construction, Metro encourages any impact analysis to include potential impacts on the Metro Bus lines and the need to provide transit and first/last mile connections to nearby rail stations. Potential impacts could include construction traffic as well as operation of and shipment/deliveries to the completed Project.

2. The existing Metro bus stops must be maintained as part of the final Project. Given the high visibility of the Project, the City should require the installation of new bus stops along West Century Boulevard and South Prairie Avenue. During construction, the stops must be maintained or relocated consistent with the needs of Metro Bus operations. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro’s Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.

3. Metro strongly encourages the installation of ADA-compliant curbs and ramps, enhanced crosswalks, wayfinding signage, pedestrian scaled lighting, as well as a continuous canopy of shade trees, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort in accessing the nearby bus stops. The City should consider requiring the installation of such amenities as part of the conditions of approval for the Project.
4. Any planned wayfinding signage that also includes Metro content/information, or features the Metro brand and/or associated graphics (such as bus or rail pictograms), must conform to Metro Signage Standards, and requires review and approval by Metro Art & Design. Metro reserves the right to review and approve any use of its information on such signage. Please contact Lance Glover, Senior Manager with Metro Signage & Environmental Graphic Design at GloverL@metro.net or 213.922.2360, with any questions or for the latest version of the Metro Signage Standards.

5. Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

6. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

**Transit Orientation**

Considering the proximity to the Metro bus service and nearby rail lines- Hawthorne/ Lenox Station and Downtown Inglewood Station- Metro would like to identify the potential synergies associated with transit-oriented development:

1. Metro supports development of commercial and residential properties near transit hubs and understands that increasing development near these areas represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. Metro encourages the City and Project sponsor to be mindful of the Project’s proximity to transit. Metro strongly encourages that at least one building entrance for the Project is oriented to West Century Boulevard and South Prairie Avenue.

2. Metro would like to inform the Project sponsor of Metro’s employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Business Transit Access Pass (B-TAP) programs which offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Devon Deming at 213-922-7957 or DemingD@metro.net.

3. Metro strongly encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities or parking benefit districts, as well as shuttle services between the proposed Project and nearby rail lines. These strategies should be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand. Further, there may be more parking than necessary at the Project site given its transit-rich location.

4. Metro would like to inform the Project sponsor to take into consideration the Metro’s Inglewood First/Last Mile Planning Project that will be submitted to the City by end of 2018. Metro encourages the City and Project sponsor to be mindful of the potential first/last mile recommendations derived from the project.
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**Active Transportation**

Metro encourages the City to work with the Project sponsor to promote bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks, as well as secure and enclosed long-term bicycle parking for guests and employees. Bicycle parking facilities should be highly visible, easy to locate, and sited so they can be safely and conveniently accessed. Additionally, the Project sponsor should help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations such as the Downtown Inglewood and Hawthorne/ Lenox stations. The Project design should support these connections with wayfinding signage inclusive of all modes of transportation.

**Congestion Management Program**

Beyond impacts to Metro facilities and operations, Metro must also notify the Project sponsor of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the “2010 Congestion Management Program for Los Angeles County,” Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed Project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).

2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed Project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.

3. Mainline freeway-monitoring locations where the Project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Derek Hull at 213-922-3051 or by email at DevReview@metro.net. If you would like to mail correspondences regarding the comment letter, please send to the address listed below.
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Metro Development Review
One Gateway Plaza MS 99-18-63
Los Angeles, CA 90012-2952

Sincerely,

Derek Hull
Manager, Transportation Planning

Attachments: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis