

---

Robert B. Hodil  
D 415.772.5738  
rhodil@coblenzlaw.com

June 12, 2019

**VIA E-MAIL AND U.S. MAIL**

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

Re: Supplemental Submittal re: AB 987 Application for the Inglewood Basketball and Entertainment Center Project (Clearinghouse No. 2018021056)

Dear Ms. Gordon:

This firm represents Murphy's Bowl, LLC ("Murphy's Bowl") regarding the Inglewood Basketball and Entertainment Center project (the "IBEC Project").

On August 31, 2018, the Legislature passed Assembly Bill 987, and in it recognized the unique circumstances presented by the IBEC Project due to its location in the highly underserved community in the City of Inglewood—an economically disadvantaged city with one of the highest percentages of minority residents in Southern California. It acknowledges the essential economic stimulus that the IBEC Project's construction of a major sports venue will provide. The criteria for the Governor's certification under AB 987 recognizes the opportunity presented by the IBEC Project to advance the aspirations and environmental conditions of this community. The criteria are specific and the AB 987 application materials submitted on January 2, 2019, (the "IBEC Project AB 987 Application") establish conclusively that the IBEC Project meets them.

We urge that you reject the project opponents' attempts to thwart the Legislature's intent through distraction, delay, and requests for extraneous information that have no bearing on the AB 987 process.<sup>1</sup> We further request that you complete your review of the IBEC Project AB 987 Application promptly and forward it to the Governor for certification.

---

<sup>1</sup> This is not an EIR process—which is unaffected. It is only a process that in the end obtains privately financed valuable environmental benefits otherwise unavailable to Inglewood. In exchange, AB 987 does nothing more than provide the same expedited litigation schedule afforded others.

Ms. Kate Gordon  
Office of Planning and Research  
June 12, 2019  
Page 2

The IBEC Project Meets and Exceeds the Requirements for Certification.

On January 2, 2019, Murphy's Bowl submitted the IBEC Project AB 987 Application, in accordance with AB 987 and OPR's AB 900 Guidelines, supported by detailed technical analyses. At your request, this letter attaches supplemental information on a few topics. This information is similar in substance and scope to supplemental memoranda that have been submitted on AB 900 applications. Accordingly, we expect and request that this submittal be treated in the same manner as those for previous AB 900 projects - as supplemental materials triggering a 7-day public review period - consistent with the Governor's Guidelines for Streamlining Judicial Review Under the California Environmental Quality Act Pursuant to AB 900.<sup>2</sup>

We have carefully reviewed the opposition letters with AECOM, the environmental technical experts who performed the analysis and prepared the application materials. While lengthy, the opposition letters actually only raise few potentially relevant issues. This letter explains why the IBEC Project meets the statutory requirements for certification and summarizes supplemental technical memoranda from AECOM addressing the actual modest technical issues raised in the letters, as follows:

- The TDM Program (Attachment C to the IBEC Project AB 987 Application) is supplemented by modifying one measure to additionally provide for discounted rides or other similar benefits for event attendees sharing transportation network company rides to or from an event. See Supplemental Transportation Demand Management (TDM) Technical Memorandum, attached as Attachment 1.
- The IBEC TDM Program will achieve AB 987's trip reduction requirements. See Trip Generation Supplemental Technical Memorandum, attached as Attachment 2, which describes refinements to Attachment D: IBEC Trip Generation Memorandum of the IBEC Project AB 987 Application.
- The IBEC Project will result in net zero greenhouse gas emissions. See Greenhouse Gas Supplemental Technical Memorandum, attached as Attachment 3, which describes refinements to Attachment G: Greenhouse Gas (GHG) Analysis of the IBEC Project AB 987 Application.

---

<sup>2</sup> These Guidelines apply to the IBEC Project pursuant to Public Resources Code Section 21158.6.8(c)(3).

Ms. Kate Gordon  
Office of Planning and Research  
June 12, 2019  
Page 3

- The IBEC Project meets AB 987's prevailing and living wage requirements. See letter dated April 4, 2019, from Los Angeles/Orange County Building and Construction Trades Council, attached as Attachment 4, confirming that, on behalf of its affiliated Local Unions and District Councils, it has entered into a Project Labor Agreement for the IBEC Project.

In addition, as a courtesy to assist with your review of the IBEC Project AB 987 Application, AECOM has prepared an AB 987 IBEC Replies to Correspondence memorandum, which is also included in this submittal. The memorandum provides a summary response to each of the key opposition letter claims. For each such claim, it details why no additional information or revisions are necessary, or summarizes refinements that have been made to the analysis.

#### Opponents' Attempts to Thwart the Legislature Must Be Rejected.

The letters submitted by attorneys for IBEC Project opponent MSG Forum, LLC ("MSG") and its allies<sup>3</sup> are the latest missives in an ongoing effort by MSG to spread disinformation, prevent development of the IBEC Project and stifle competition for MSG's event venue. The bulk of the substantive comments on the IBEC Project AB 987 Application come from MSG and IRATE and are part of an unprecedented effort to try to overwhelm your agency's responsible substantive review and the resources of the City of Inglewood.

MSG and its allies know that the AB 987 criteria are limited, and that the IBEC Project meets them. No hyper-technical creative reading—or ignorance of the actual AB 987 criteria—changes this. MSG hopes to delay the certification process by convincing you that the IBEC Project AB 987 Application must meet the much more detailed requirements for an EIR project description and environmental impacts analysis. That, of course, is incorrect.

The essence of the opponents' claim is that you should apply some other standard to this limited purpose, streamlining application—something other than that set forth in AB 987. The level of detail in the IBEC Project AB 987 Application's project description is complete. It also is similar to that found in approved AB 900 applications, and is sufficient to enable OPR and

---

<sup>3</sup> In MSG's discovery responses in one of the several lawsuits it has filed against the City of Inglewood, MSG admitted that it is paying the attorney's fees for Chatten-Brown, Carstens & Minter, which represents a purported group of unnamed membership under the moniker of "Inglewood Residents Against Takings and Evictions" ("IRATE") in two *other* actions against the City seeking to block the IBEC Project. (See April 17, 2019, Amended Responses to City Defendants' Requests for Admission, Nos. 4, 5, and 6.). All more of the same "exhaust the City resources" strategy.

Ms. Kate Gordon  
Office of Planning and Research  
June 12, 2019  
Page 4

CARB to review and analyze the IBEC Project and its satisfaction of the statutory criteria for certification for streamlining. The Governor's Office of Planning and Research and California Air Resources Board should view the letters submitted by MSG and its allies skeptically.

A second letter from MSG and letters from Climate Resolve and the Natural Resources Defense Council were submitted after the 30-day deadline for comments, and in MSG's case, several months after the deadline. These late letters do not require consideration and should be disregarded by CARB and OPR. However, in an abundance of caution and in furtherance of improving the public's understanding, this submittal addresses all substantive issues raised in the late correspondence and, as further detailed below, makes clear that:

1. The IBEC Project AB 987 Application's greenhouse gas emissions analysis baseline and methodology are sound and consistent with CEQA and with prior CEQA streamlining precedent.
2. The IBEC Project AB 987 Application demonstrates that the proposed TDM Program for the IBEC Project will achieve the enforceable obligation to attain a 15 percent vehicle trip reduction.
3. The IBEC Project AB 987 Application demonstrates that the IBEC Project will attain LEED Gold certification.
4. The IBEC Project AB 987 Application demonstrates that the IBEC Project is consistent with the Regional Transportation Plan/Sustainable Communities Strategy.
5. The IBEC Project AB 987 Application demonstrates that the IBEC Project will result in a minimum investment of \$100 million in California.
6. The IBEC Project AB 987 Application demonstrates that the IBEC Project will have a project labor agreement.
  1. The IBEC Project AB 987 Application's greenhouse gas emissions analysis baseline and methodology are sound and consistent with CEQA and with prior CEQA streamlining precedent.

MSG makes several arguments regarding alleged use of an incorrect baseline to evaluate greenhouse gas (GHG) emissions, and establish that 50% of the GHG emissions reductions achieved for the IBEC Project result from local, direct measures, some of which are echoed in letters submitted by others.

Ms. Kate Gordon  
Office of Planning and Research  
June 12, 2019  
Page 5

They argue that the baseline should be adjusted year-to-year over the 30-year life of the IBEC Project. The baseline is consistent with the CEQA Guidelines and case law and is based on precedent from other projects previously certified for CEQA streamlining under AB 900, including the Portrero Power Station, 10 South Van Ness, and 8150 Sunset Boulevard projects. There is no reason for the GHG analysis for the IBEC Project to be treated any differently than other certified streamlining projects.

MSG and other commenters criticize the IBEC Project AB 987 Application's baseline assumptions that existing LA Clippers games at the Staples Center would not be replaced with other events, and that non-Clippers events at the IBEC Project would be moved from other existing venues and not replaced with other events (i.e., a portion of the events anticipated to be hosted at the IBEC Project would be "market-shifted" events within the Los Angeles regional market rather than new events in the region creating net new vehicle trips and associated GHG emissions). The IBEC Project AB 987 Application's assumptions are reasonable, and supported by the analysis in it. However, in consideration of the correspondence, they have been further refined based on additional analysis performed by Conventions, Sports & Leisure International ("CSL"), experts in the sports, entertainment, convention, and visitor industries, which is reflected in the supplemental GHG analysis enclosed herein as Attachment 3. CSL reasonably estimates that up to seven of the vacated event days per year at the Staples Center made available by relocation of the LA Clippers to the IBEC arena would be utilized to host another event type. Although as the IBEC Project AB 987 Application stated, it continues to be speculative as to how the LA Clippers existing training and practice facility in Playa Vista might be reused, the refined supplemental analysis conservatively assumes its replacement with a use that would generate the same level of emissions, so that the existing GHG emissions from that facility are no longer credited against the IBEC Project's GHG emissions.

MSG also argues speciously that the baseline cannot include emissions from off-site uses that would cease or reduce operations when those uses are transferred to the IBEC Project. The regulations and rules MSG relies on pertain to stationary sources of air pollutants and are irrelevant to the requirement under AB 987 for the IBEC Project to achieve net zero GHG emissions.

MSG's late submittal regarding demolition credit for the 3333 California and Hollywood & Wilcox projects is similarly off base. Neither of those projects involved the relocation of uses or activities from other sites to the project sites and, therefore, the issue of credits for offsite uses that would cease operations was not addressed in CARB's determinations regarding those projects.

Ms. Kate Gordon  
Office of Planning and Research  
June 12, 2019  
Page 6

The refined greenhouse gas analysis indicates that the IBEC Project would achieve 49.5 percent of emissions reduction through implementation of the IBEC TDM Program for the IBEC Project, or approximately 99 percent of the emission reductions from local, direct measures required by AB 987, and 50.1 percent for the IBEC Project Variants. As explained in Attachment 3, and consistent with the requirements of AB 987 set forth in Public Resources Code section 21168.6.8(j)(3), the IBEC Project will include one or more additional local, direct measures if necessary to meet the 50 percent local, direct emission reductions requirement, potentially including, but not limited to: (1) additional renewable energy production through installation of additional photovoltaic systems as carports on a third parking structure, (2) purchase of energy for onsite 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 (3) if available after approval by applicable regulatory agencies, on-site use of renewable natural gas.

In sum, the greenhouse gas analysis is well supported, consistent with other AB 900 precedent, and meets the requirements for certification.

2. The IBEC Project AB 987 Application demonstrates that the proposed TDM Program for the IBEC Project will achieve the enforceable obligation to attain a 15 percent vehicle trip reduction.

MSG also alleges defects in the analysis of the trip reduction that would be achieved by the proposed TDM Program, relying on their consultant's unsubstantiated "observational data" that does not meet industry best practices. The arguments ignore the facts: AB 987 requires the Clippers to verify to the City of Inglewood that the required vehicle trip reduction goal is achieved and maintained, and that the City and applicant already have entered into a binding and enforceable agreement, included in the IBEC Project AB 987 Application package, implementing this requirement. Simply put, the opponents wish you to believe the facts are different or that some other standard applies. It does not.

3. The IBEC Project AB 987 Application demonstrates that the IBEC Project will attain LEED Gold certification.

MSG argues that the IBEC Project AB 987 Application did not adequately demonstrate that the IBEC Project will attain LEED Gold certification. The attached AECOM memorandum establishes that sufficient information has been provided to demonstrate compliance with LEED Gold certification requirements. It is consistent with the level of information submitted for other AB 900 applications. And again, the opponents ignore the fact that the City and applicant have entered into a binding and enforceable agreement, included in the IBEC Project AB 987

Ms. Kate Gordon  
Office of Planning and Research  
June 12, 2019  
Page 7

Application package in full conformity with the precise requirements of AB 987, which requires the applicant to attain LEED Gold certification.

4. The IBEC Project AB 987 Application demonstrates that the IBEC Project is consistent with the Regional Transportation Plan/Sustainable Communities Strategy.

The IBEC Project AB 987 Application has demonstrated that the IBEC Project is consistent with the 2016 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS") approved by the Southern California Association of Governments ("SCAG").

Contrary to arguments made by MSG, the RTP/SCS does not prescriptively direct where growth must go or dictate land uses, density, or intensity for any specific development or site. The RTP/SCS acknowledges that increases in population, households, and employment demand will induce land use changes. It seeks to support sustainable growth through a more compact, infill and walkable development pattern by encouraging new density and intensity in High Quality Transit Areas (HQTAs) and other infill opportunity areas that are accessible to transit.

The SCAG existing land use and General Plan land use maps, regional development types, land development categories and urban footprint place types in the appendices to the RTP/SCS are analytical tools. They reflect general land uses across the region and serve as a basis for modeling different potential land use and transportation outcomes. The RTP/SCS does not require specific development to be consistent with these maps and related modeling information. Rather, consistency is measured against the RTP/SCS's numerous provisions and policies that encourage growth in infill areas accessible to transit. As detailed in the IBEC Project AB 987 Application, the IBEC Project is consistent with and furthers these policies.

MSG also makes a spurious argument that the IBEC Project AB 987 Application somehow does not comply with AB 987 because the 2016 RTP/SCS does not achieve CARB's current target for GHG emissions reductions. The clear language of the AB 987 statute simply requires that the IBEC Project be consistent with an RTP/SCS that CARB has accepted, and the 2016 RTP/SCS meets that standard. It could have said something different. It does not. CARB and OPR have approved AB 900 applications for other projects based on consistency with the 2016 RTP/SCS since CARB increased its GHG emission reduction target.

5. The IBEC Project AB 987 Application demonstrates that the IBEC Project will result in a minimum investment of \$100 million in California.

The IBEC Project AB 987 Application provides sufficient information to demonstrate that the IBEC Project would satisfy the requirement to result in a \$100 million dollar investment in California upon completion of construction. It would be impossible to construct a new NBA

Ms. Kate Gordon  
Office of Planning and Research  
June 12, 2019  
Page 8

arena and the other uses described in the IBEC Project AB 987 Application's Project Description without far exceeding that amount and opponents have presented no credible evidence to the contrary.

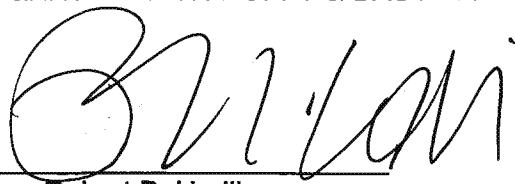
6. The IBEC Project AB 987 Application demonstrates that the IBEC Project will have a project labor agreement.

As stated in the IBEC Project AB 987 Application, the Applicant has already entered into a project labor agreement (PLA) to fulfill the prevailing wage, living wage, and skilled and trained workforce requirements of AB 987. This supplemental submittal includes a letter dated April 4, 2019, from Los Angeles/Orange County Building and Construction Trades Council confirming that, on behalf of its affiliated Local Unions and District Councils, it has entered into a Project Labor Agreement for the IBEC Project (Attachment 4).

In sum, the IBEC Project AB 987 Application meets all of the requirements for certification of the IBEC Project for CEQA streamlining under AB 987. All of the issues raised in the correspondence received by OPR and CARB are addressed in this supplemental submittal, are irrelevant, are intentionally misguided, or are belated and should be rejected. We very much appreciate and look forward to OPR and CARB's prompt review and the Governor's certification of the IBEC Project for CEQA streamlining. We would be glad to discuss any questions either agency may have at your earliest convenience.

Very truly yours,

COBLENTZ PATCH DUFFY & BASS LLP

By:   
Robert B. Hodil

cc: Mary Nichols, Chair, Air Resources Board  
Richard Corey, Executive Director, Air Resources Board  
Steven Cliff, Deputy Executive Officer, Air Resources Board  
Gerard McCallum, Senior Project Manager



## **Attachment 1**

# **IBEC Transportation Demand Management Program (IBEC TDM Program) Supplemental Technical Memorandum**

## Attachment 1: IBEC Transportation Demand Management Program (IBEC TDM Program) Supplemental Technical Memorandum

To Office of Planning and Research, California Air Resources Board Page 1

Subject IBEC Transportation Demand Management Program (IBEC TDM Program) Supplemental Technical Memorandum

Prepared by: AECOM  
300 California Street, Suite 600 San Francisco, CA

Date June 3, 2019

---

### Introduction

This technical memorandum describes a refinement to Attachment C: IBEC Project Transportation Demand Management (TDM) Program Memorandum of the Assembly Bill (AB) 987 application for the Inglewood Basketball and Event Center (IBEC; IBEC Project) submitted January 2019. Specifically, this technical memorandum identifies an additional incentive to encourage carpooling for shared mobility users.

### Supplemental Analysis Update to TDM Program

An additional incentive has been added to ***TDM 3 – Encourage Carpools and Zero Emission Vehicles*** to further encourage carpooling among shared mobility users attending IBEC events. The updated text modifies the first bullet point of TDM 3 and is shown below in red font. The additional incentive would provide discounted rides (or other, similar benefits) for event attendees sharing transportation network company (TNC) rides to or from the event, with a goal of increasing attendee average vehicle occupancy (AVO) for the shared mobility mode. The LA Clippers organization would coordinate and work with TNCs to implement this incentive.

- 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 transportation network company (TNC) rides to or from the event, or other discounts/benefits.

## **Attachment 2**

### **Trip Generation Supplemental Technical Memorandum**

## Attachment 2: Trip Generation Supplemental Technical Memorandum

To Office of Planning and Research, California Air Resources Board Pages 11

Subject AB 987 Application for the Inglewood Basketball and Event Center (IBEC) Project Trip Generation Supplemental Technical Memorandum

From AECOM, 300 California Street, Suite 600, San Francisco, CA

Date June 2019

---

### Introduction

The Assembly Bill (AB) 987 application for the Inglewood Basketball and Entertainment Center Project (IBEC Project AB 987 Application) submitted in January 2019 included the IBEC Project Trip Generation Memorandum as Attachment D. That memorandum evaluates the effectiveness of the proposed IBEC Transportation Demand Management Program, as described in Attachment C to the application submitted in January 2019 (IBEC TDM Program) by comparing the estimated annual trip generation for the IBEC Project without implementation of the IBEC TDM Program (the IBEC Project Without IBEC TDM Program Scenario) to the estimated annual trip generation for the IBEC Project with implementation of the IBEC TDM Program (the IBEC Project With IBEC TDM Program Scenario) to determine the annual trip reduction resulting from implementation of the IBEC TDM Program.

The IBEC Project Trip Generation Memorandum provides a detailed description of the methodology used to calculate the annual trip generation for the IBEC Project and the reduction in vehicle trips resulting from implementation of the IBEC TDM Program. This technical memorandum describes a refined supplemental trip generation analysis. These refinements are the result of updated information regarding the parking configuration of the IBEC Project, additional research and analysis, and revisions to the analysis made in consideration of correspondence regarding the IBEC Project AB 987 Application submitted in January 2019. These refinements also reflect the modification of one IBEC TDM Program measure to additionally provide for discounted rides or other similar benefits for event attendees sharing transportation network company rides to or from an event. (See Attachment 1, IBEC Transportation Demand Management Program (IBEC TDM Program) Supplemental Technical Memorandum).

This supplemental technical memorandum identifies the specific changes and corrections made to analysis assumptions or data and presents the refined results of the supplemental analysis to be incorporated into the IBEC Project AB 987 Application. This memorandum includes the following specific changes to the IBEC Project Trip Generation Memorandum:

- **Ancillary Use Trip Generation Rates**

Trip generation rate refinements were made to the LA Clippers organization office and team practice and training facility and for the sports medicine clinic. These refinements to the trip generation rates for these land uses were made in consideration of correspondence regarding the IBEC Project AB 987 Application submitted in January 2019. Replies to correspondence are included in Attachment 5 to this supplemental submittal.

Internal trip capture between ancillary land uses was updated to reflect the refined trip generation rates for these three uses, and the methodology for estimating and applying trip capture reductions was modified to improve the overall precision of the calculation. As explained in detail below, trip generation for all ancillary uses during events was also revised to reflect a lower, more conservative trip capture rate, and a few miscalculations in the application of daily trip rates for weekends for the ancillary uses were rectified.

- **Average Vehicle Occupancy for Events**

Refinements were made to the average vehicle occupancy (AVO) for event employees and attendees in the IBEC Project Without IBEC TDM Program Scenario. These refinements to the AVO use updated and additional survey information obtained since January 2019 to reflect existing and anticipated travel behavior and patterns. Adjustments were also made to the IBEC Project With IBEC TDM Program Scenario to reflect updated information regarding anticipated use of additional off-site parking available in the area near the IBEC Project site, thereby reducing event employee and attendee AVO for the drive mode to lower, more conservative values.

- **Mode Share Percentages for Events**

This updated analysis includes refinements to the mode share percentages for employees and attendees under the IBEC Project With TDM Program Scenario. The mode share assumptions were adjusted to account for anticipated use of additional off-site parking available in the area near the IBEC Project site by event employees and attendees, resulting in somewhat higher, more conservative mode shares for driving and lower mode shares for public transit, charter coaches, vanpools, microbuses / microtransit, and walking.

The following sections of this supplemental technical memorandum provide more detailed explanations for each of the bulleted items above, as well as updated estimates of annual trip generation for the IBEC Project Without IBEC TDM Program Scenario and IBEC Project With TDM Scenario, updates to the tables included in the IBEC Project Trip Generation Memorandum that are affected by these refinements to the analysis, and an updated calculation of annual trip reduction resulting from implementation of the IBEC TDM Program. The refinements and modifications described below replace or refine the analysis included in the IBEC Project Trip Generation Memorandum. The analysis and tables in the IBEC Project Trip Generation Memorandum that are not affected by these changes are not included in this memorandum.

## Supplemental Trip Generation Analysis

### Ancillary Use Trip Generation Rates

The supplemental transportation analysis has been refined to reflect higher trip generation rates for the LA Clippers organization office and the team practice and training facility. The trip generation rate for the sports medicine clinic has also been changed to the correct rate from the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th edition).

Table 2 in the IBEC Project Trip Generation Memorandum provides a summary of the ancillary uses and the corresponding square footages and trip rates applied for the vehicle trip generation calculation. The refined Table 2 provided below replaces that table. The adjusted values are highlighted in yellow.

As shown in the refined Table 2, the trip generation rate for the LA Clippers organization office has been replaced with a more conservative ITE trip rate of 7.95 trips per 1,000 square feet for a “corporate headquarters building.” In the Attachment D IBEC Project Trip Generation Memorandum, trip generation for the LA Clippers organization office, based on the number of employees and assumed values for mode shares and AVO, was estimated at approximately 91,520 annual vehicle trips prior to application of trip reductions for internal trip capture. The corresponding value in this supplemental analysis, which uses the “corporate headquarters building” ITE trip rate based on square footage, is approximately 146,757 annual vehicle trips, prior to application of internal trip capture reductions.

For the practice/training facility, the assumed trip rate has been increased to 2.00 trips per employee, which effectively assumes that each employee is present every day and will make two trips per day (one to the facility and one leaving the facility). In the Attachment D IBEC Project Trip Generation Memorandum, trip generation for the practice/training facility was estimated using the same approach as for the LA Clippers organization office, based on the number of employees and assumed values for mode shares and AVO. With those assumptions, the effective trip rate provided in the IBEC Project Trip Generation Memorandum submitted in January 2019 was 1.28 trips per employee.

The trip generation rate for the sports medicine clinic has also been corrected, replacing the lower, erroneous value of 30.18 trips per 1,000 square feet used in the IBEC Project Trip Generation Memorandum with the higher, correct value of 38.16 trips per 1,000 square feet.

Table 2 – Ancillary Land Uses and Trip Generation Rates					
Land Use	Size		Land Use Code	Weekday Daily Average Rate	Weekend Daily Average Rate
LA Clippers Team Office (Management and Operations Employees)	71	TSF	ITE 714 – Corporate Headquarters	7.95	--
LA Clippers Team Practice & Training Facility – (Basketball Operations Employees)	54	EMP	AM: 1 Trip Per Employee; PM: 1 Trip Per Employee	2.00	--
Sports Medicine Clinic	25	TSF	ITE 630 – Clinic	38.16	--
Community Space	15	TSF	ITE 495 – Recreational Community Center	28.82	--
Full-Service Plaza Restaurant/Bar	7	TSF	ITE 931 – Quality Restaurant	83.84	90.04
Full-Service Restaurant/Lounge	8	TSF	ITE 931 – Quality Restaurant	83.84	90.04
Coffee Shop	5	TSF	ITE 930 – Fast Casual Restaurant	315.17	318.62
Quick-Service Restaurant	4	TSF	ITE 930 – Fast Casual Restaurant	315.17	318.62
LA Clippers Team Store	7	TSF	SANDAG – Specialty Retail	40.00	40.00
Other General Retail & Service	17	TSF	SANDAG – Specialty Retail	40.00	40.00
Hotel (limited service no restaurant)	150	RM	ITE 312 – Business Hotel	4.02	5.79

Yellow shading indicates values or assumptions that are different from the IBEC Project Trip Generation Memorandum included as Attachment D to the IBEC Project AB 987 Application as submitted in January 2019.

The internal trip capture assumptions for ancillary uses—which are based on National Cooperative Highway Research Program (NCHRP) Report 684: Enhancing Internal Trip Capture Estimation for Mixed-Use Developments—were updated to reflect the changes in trip generation for the LA Clippers organization office, team practice and training facility, and sports medicine clinic. The methodology for estimating and applying the trip capture percentages using NCHRP Report 684 was also updated to improve the overall precision of the calculation. To simplify the calculation, the IBEC Project Trip Generation Memorandum submitted in January 2019 estimated trip capture percentages based on average daily traffic (ADT), and then applied the estimated percentages to each ancillary use individually. This supplemental analysis refines the approach, estimating trip capture percentages based on weekday PM peak-hour vehicle trips to improve the overall precision of the calculation. A single internal trip capture percentage was then applied uniformly to all ancillary uses to avoid inconsistencies that may arise due to differences in the estimated trip capture percentages between entering (inbound) and exiting (outbound) traffic.

Internal trip capture assumptions for ancillary uses during events were also reduced slightly to reflect lower, more conservative values. The analysis for the IBEC Project Trip Generation Memorandum submitted in January 2019 assumes a 100% trip capture rate between IBEC events and ancillary uses, based on the assumption that any visitor entering the IBEC Project site (even if only to visit an ancillary use) during an event would go through the security screening process implemented for the event, regardless of whether or not they are attending the event. With this security screening process in effect during events at IBEC, the January 2019 analysis assumed that it would be unlikely that ancillary use customers who are not attending an IBEC event would visit the ancillary uses during an event. The supplemental analysis now reflects a more conservative internal trip capture rate of 81% between events and ancillary uses, derived based on a weighted average of trip capture rates for large events and small events. This updated internal trip capture rate accounts for non-event-attendee visitors to the ancillary uses during events.

The IBEC Project Trip Generation Memorandum submitted in January 2019 also included an error in the application of daily trip rates for weekends for the ancillary uses. In the IBEC Project Trip Generation Memorandum submitted in January 2019, the calculation of weekend vehicle trips for the ancillary uses erroneously referenced the weekday daily trip rates. The supplemental transportation analysis corrects this error in the weekend vehicle trip estimates by appropriately referencing the weekend daily trip rates.

With the refinements to the ancillary use trip generation assumptions and calculations described above, the total annual trip generation estimates have increased for some ancillary uses and decreased for others relative to the IBEC Project Trip Generation Memorandum submitted in January 2019. The supplemental analysis results in a total annual trip estimate across all of the ancillary uses that is higher (and more conservative) than the analysis included in the IBEC Project Trip Generation Memorandum submitted in January 2019, as summarized in **Table A**.

<b>Table A – Supplemental Technical Memorandum Ancillary Use Trip Generation Comparison</b>		
	<b>IBEC Project Trip Generation Memorandum (January 2019)</b>	<b>IBEC Project Trip Generation Supplemental Technical Memorandum (June 2019)</b>
IBEC Project Without IBEC TDM Program Scenario	1,636,279	1,805,072
IBEC Project With IBEC TDM Program Scenario	1,617,610	1,728,157



**Average Vehicle Occupancy for Events**

This supplemental transportation analysis includes refinements to AVO for event employees and attendees in the IBEC Project Without IBEC TDM Program Scenario. These refinements are based on updated and additional event surveys obtained since the submittal of the IBEC Project Trip Generation Memorandum in January 2019, and result in reductions to the assumed AVO for drive and shared mobility (e.g., TNC) modes to lower, more conservative values. The changed AVO values are shown in refined Table 4, and reflect three main data sources:

- Event-related employee AVO of 1.18, data from the 2017 National Household Travel Survey on commute trips.
- Attendee AVO of 2.27 for basketball games, based on the results of a survey of attendees of LA Clippers basketball games hosted at the Staples Center in downtown Los Angeles, California.
- Attendee AVO of 2.18 for concerts and other events, based on a review of various concert event data.

<b>Table 4 – IBEC Project Without IBEC TDM Program Average Vehicle Occupancy</b>					
Modes of Transportation		Basketball Games		Concerts/Other Events	
		Employee	Attendee	Employee	Attendee
Drive (Auto)	Weekday	1.18	2.27	1.18	2.18
	Weekend	1.18	2.27	1.18	2.18
Shared Mobility (TNC)	Weekday	1.18	2.27	1.18	2.18
	Weekend	1.18	2.27	1.18	2.18

Yellow shading indicates values or assumptions that are different from the IBEC Project Trip Generation Memorandum included as Attachment D to the IBEC Project AB 987 Application as submitted in January 2019.

As shown in the updated Table 7, below, these revised AVO assumptions result in a higher number of projected annual trips for employees and attendees in the IBEC Project Without IBEC TDM Scenario.

In conjunction with these refinements to AVO in the IBEC Project Without IBEC TDM Program Scenario, this supplemental transportation analysis also includes corresponding refinements to event employee and attendee AVO for the drive mode in the IBEC Project With IBEC TDM Program Scenario. These refinements continue to reflect a projected increase in employee and attendee AVO with implementation of the IBEC TDM Program, but show lower AVO values for the drive mode relative to the application submitted in January 2019. These lower, more conservative AVO values account for anticipated use of additional available parking in the areas near the IBEC Project site by event employees and attendees who drive to the IBEC Project site for an event, and are summarized in refined Table 6.

Modes of Transportation		Basketball Games		Concerts/Other Events	
		Employee	Attendee	Employee	Attendee
Drive (Auto)	Weekday	1.42	2.59	1.42	2.57
	Weekend	1.42	2.82	1.42	2.80
Shared Mobility (TNC)	Weekday	1.50	2.70	1.50	2.70
	Weekend	1.50	3.00	1.50	3.00

Yellow shading indicates values or assumptions that are different from the IBEC Project Trip Generation Memorandum included as Attachment D to the IBEC Project AB 987 Application as submitted in January 2019.

The revised AVO assumptions result in a higher number of projected annual trips for employees and attendees in the IBEC Project With IBEC TDM Scenario, as shown in Table 7 below.

**Mode Share Percentages for Events**

This supplemental trip generation analysis also incorporates more conservative assumptions regarding mode share percentages as compared to the IBEC Project Trip Generation Memorandum submitted in January 2019 to account for the use of additional off-site parking lots in the area by event employees and attendees. These changes are represented in refined Table 5. In particular, the drive mode share has been substantially increased to a more conservative value, with corresponding reductions in mode share percentages for public transit (rail and bus), charter coaches (“park-n-ride”), vanpools, minibuses/microtransit, and walking modes. These refinements reflect a one-third (33%) reduction in mode share for these non-drive modes as compared to the application submitted in January 2019, with the difference being shifted directly to an increased drive mode share.

With these refinements, the IBEC project continues to show a decrease in the drive mode share (and increases in the share of transit and other modes) in the IBEC Project With IBEC TDM Program Scenario relative to the IBEC Project Without IBEC TDM Scenario, but with more conservative assumptions overall for mode split. A fan survey conducted by the LA Clippers organization during the 2018/19 season indicates a drive mode share of 77% and a public transit mode share of 9% among fans attending LA Clippers games at the Staples Center. With the mode split shown in the refined Table 5, the supplemental analysis assumes a higher overall drive mode share and lower public transit mode share for the IBEC Project—even with implementation of the IBEC TDM Program—than for the Staples Center, even though there is no formal TDM program (nor are there other similar measures) currently in effect for LA Clippers games at the Staples Center.

<b>Table 5 – IBEC Project With IBEC TDM Program Transportation Mode Shares</b>				
Modes of Transportation	Basketball Games / Concerts		Other Events	
	Employee	Attendee	Employee	Attendee
Drive % (Auto)	77%	74%	77%	85%
Transit – Metro Rail %	7%	7%	7%	3%
Transit - Public Bus %	7%	1%	7%	1%
Charter Coaches %	0%	7%	0%	0%
Vanpool %	3%	0%	3%	0%
Minibuses / Microtransit %	3%	1%	3%	1%
Shared Mobility (TNC) %	1%	10%	1%	10%
Walk %	1%	0%	1%	0%
Bike %	1%	0%	1%	0%
Total of Other Modes of Transportation	23%	26%	23%	15%
Total Mode Share Percentage	100%	100%	100%	100%

Yellow shading indicates values or assumptions that are different from the IBEC Project Trip Generation Memorandum included as Attachment D to the IBEC Project AB 987 Application as submitted in January 2019.

### Supplemental Analysis Project Vehicle Trip Generation

Based on the refinements discussed above, the refined trip generation estimates for the IBEC Project Without IBEC TDM Program Scenario and the IBEC Project With IBEC TDM Program Scenario are represented in refined Table 7 below. Results are tabulated by land use and day (weekday or weekend).

As shown in refined Table 7, the refinements and corrections to the trip generation analysis described above result in changes to the annual trip generation for all proposed land uses included in the IBEC Project as compared to the January 2019 IBEC Project Trip Generation Memorandum. The annual vehicle trip generation is 3,841,388 vehicle trips for the IBEC Project Without IBEC TDM Program Scenario, and 3,238,459 vehicle trips for the IBEC Project With IBEC TDM Program Scenario.

<b>Table 7 – IBEC Project Vehicle Trip Generation Summary</b>						
<b>IBEC Project Without IBEC TDM Program</b>						
IBEC Project	Size	Estimated Annual Trips				Total
		Weekday		Weekend		
		Days with Events	Days without Events	Days with Events	Days without Events	
Arena (employees)	Varies	116,284	0	72,996	0	189,280
Arena (attendees)	Varies	1,120,738	0	726,298	0	1,847,036
LA Clippers Office	71 TSF	67,779	48,159	0	0	115,938
LA Clippers Practice & Training Facility	54 EMP	12,969	6,740	0	0	19,709
Sports Medicine Clinic	25 TSF	114,556	81,395	0	0	195,951
Community Space	15 TSF	51,911	36,884	0	0	88,795
Full-Service Restaurant/Bar	7 TSF	47,618	45,065	33,716	6,416	132,815
Full-Service Restaurant/Lounge	8 TSF	54,420	51,503	38,533	7,332	151,788
Coffee Shop	5 TSF	135,818	121,006	90,527	16,216	363,567
Quick-Service Restaurant (no drive thru)	4 TSF	102,288	96,805	68,178	12,973	280,244
LA Clippers Team Store	7 TSF	22,090	21,501	14,564	2,850	61,005
Other General Retail & Service	17 TSF	53,647	52,216	35,370	6,922	148,155
Hotel (limited service no restaurant)	150 RM	91,656	65,124	79,034	11,291	247,105
	<b>Total</b>	<b>1,991,774</b>	<b>626,398</b>	<b>1,159,216</b>	<b>64,000</b>	<b>3,841,388</b>

<b>Table 7 – IBEC Project Vehicle Trip Generation Summary (cont'd)</b>						
<b>IBEC Project With IBEC TDM Program</b>						
IBEC Project	Size	Estimated Annual Trips				Total
		Weekday		Weekend		
		Days with Events	Days without Events	Days with Events	Days without Events	
Arena (employees)	Varies	79,952	0	50,186	0	130,138
Arena (attendees)	Varies	867,034	0	513,130	0	1,380,164
LA Clippers Office	71 TSF	64,390	45,751	0	0	110,141
LA Clippers Practice & Training Facility	54 EMP	12,969	6,740	0	0	19,709
Sports Medicine Clinic	25 TSF	108,828	77,325	0	0	186,153
Community Space	15 TSF	49,315	35,040	0	0	84,355
Full-Service Restaurant/Bar	7 TSF	45,237	42,812	32,030	6,095	126,174
Full-Service Restaurant/Lounge	8 TSF	51,699	48,928	36,607	6,965	144,199
Coffee Shop	5 TSF	129,027	114,956	86,000	15,405	345,388
Quick-Service Restaurant (no drive thru)	4 TSF	97,173	91,965	64,769	12,324	266,231
LA Clippers Team Store	7 TSF	20,985	20,426	13,836	2,708	57,955
Other General Retail & Service	17 TSF	50,965	49,605	33,601	6,576	140,747
Hotel (limited service; no restaurant)	150 RM	91,656	65,124	79,034	11,291	247,105
	<b>Total</b>	<b>1,669,230</b>	<b>598,672</b>	<b>909,193</b>	<b>61,364</b>	<b>3,238,459</b>

As a result of the refinements and changes to the analyses described in this supplemental technical memorandum, the calculation of annual trip reduction resulting from implementation of the IBEC TDM Program as shown in Table 8 of the January 2019 IBEC Project Trip Generation Memorandum has changed. As shown in refined Table 8 below, the proposed IBEC TDM program would result in an annual reduction of approximately 602,929 vehicle trips (15.696%), and would continue to meet the 15% trip reduction target required by AB 987.

<b>Table 8 – IBEC TDM Program Vehicle Trip Reduction</b>					
Scenario	Estimated Annual Vehicle Trips				Total
	Weekday		Weekend		
	Days With Events	Days Without Events	Days With Events	Days Without Events	
IBEC Project Without TDM	1,991,774	626,398	1,159,216	64,000	3,841,388
IBEC Project With TDM	1,669,230	598,672	909,193	61,364	3,238,459
Annual Vehicle Trips Reduced	-322,544	-27,726	-250,023	-2,636	-602,929
<b>% Vehicle Trips Reduced =</b>					<b>-15.696%</b>

**Attachment 3**

**IBEC Project Greenhouse Gas Analysis Supplemental  
Technical Memorandum**

## Attachment 3: GHG Analysis Supplemental Technical Memorandum

**To** Office of Planning and Research, California Air Resources Board

---

**Subject** IBEC Project Greenhouse Gas Analysis Supplemental Technical Memorandum

---

**From** AECOM, 300 California Street, Suite 600, San Francisco, California, 94104

---

**Date** June 4, 2019

---

### Introduction

This technical memorandum describes refinements to Attachment G: IBEC Project Greenhouse Gas (GHG) Analysis to the Assembly Bill (AB) 987 Application for the Inglewood Basketball and Event Center Project (IBEC; IBEC Project) submitted in January 2019 (IBEC Project AB 987 Application). The refinements are a result of updated information regarding the parking configuration of the proposed IBEC Project, additional research and analysis, and revisions made in consideration of correspondence regarding the IBEC Project AB 987 Application. A separate supplemental memorandum with a refined trip generation analysis has been prepared and included in this submittal as Attachment 2: IBEC Project Trip Generation Supplemental Technical Memorandum. The refined trip generation analysis is reflected in this refined GHG analysis.

This technical memorandum identifies the refinements to the GHG analysis for the IBEC Project and presents updated emissions results, which include the following main items:

- Baseline emissions calculations for LA Clippers games hosted at the Staples Center were updated to reflect recent average historical reported attendance at Staples Center for the average annual number of preseason, regular season, and post-season games rather than the projected attendance at IBEC.
- Based on an analysis prepared by Conventions, Sports & Leisure International ("CSL"), experts in the sports, entertainment, convention, and visitor industries, it is reasonably anticipated that, of the existing LA Clippers game days at Staples Center that will be made available by the relocation of the LA Clippers to the IBEC Project, seven event days would be utilized for non-National Basketball Association (NBA) events, with an average attendance of 10,500.
- Based on the information provided in an analysis prepared by industry experts CSL, instead of assuming that 50 percent of non-NBA events at the IBEC Project would be market-shifted (i.e., otherwise would occur at other existing venues) and 50 percent would be new to the regional market, it is now assumed that 59 percent of the 78 major non-NBA events will be market-shifted events and 41 percent will be net new to the Los Angeles regional market. In addition, baseline emissions from market-shifted events were updated to reflect actual average historical reported attendance at surrounding event centers, rather than relying on projected attendance at IBEC for these existing market-shifted events.



- It is now assumed that, after the LA Clippers move to the IBEC Project, the existing LA Clippers Training Center will be reoccupied by a replacement use that would result in the same level of GHG emissions as the existing Training Center.
- The analysis now assumes maximum attendance of approximately 18,000 for regular and post-season NBA games hosted at the IBEC Project, rather than average attendance of approximately 16,000 for regular and post-season games to provide a conservative estimate of IBEC Project emissions. The analysis also now assumes the maximum attendance, rather than the average anticipated attendance, for the annual average number of non-NBA events anticipated to be hosted at IBEC.
- The previous analysis provided an estimate of water demand based on projected water demand for similar uses and CalEEMod default assumptions. Stetson Engineers, Inc. has prepared a water demand study that uses project-specific data, which was used to refine the GHG analysis based on this updated, project-specific estimated water demand.
- As a result of changes in the IBEC Project's parking configuration to construct a third parking structure instead of a surface parking lot, the construction emissions analysis was revised to account for additional concrete deliveries during construction and other construction activities associated with the additional parking structure.
- Trip generation data, including mode splits, sports medicine clinic and office trip rates, and average vehicle occupancy were refined in the IBEC Project Trip Generation Supplemental Technical Memorandum, included as Attachment 2 to this submittal, to reflect more recent survey data and further refinements to assumptions, which are incorporated into the refined GHG analysis. Please refer to that memo for specific details.
- The refined analysis also updates the electricity emissions factors for the surrounding utilities based on recent data that became available after the IBEC Project AB 987 Application was submitted in January 2019. The electricity emissions factors for Southern California Edison, Anaheim Public Utilities, and Los Angeles Department of Water and Power were updated to be 549 pounds per megawatt-hour (lb/MWh), 1,112 lb/MWh, and 770 lb/MWh, respectively. Additional details are provided in Appendix A. Similar to the IBEC Project AB 987 Application, the electricity emission factors associated with the IBEC Project were adjusted for future years, consistent with Renewables Portfolio Standard mandates.

### Supplemental GHG Analysis

The following section details the refined IBEC Project GHG analysis and presents updated GHG emissions results. This technical memorandum includes updates to some of the tables included in Attachment G to reflect the refined analysis that are included below (Tables 3, 5, 6, 7, 8, 9, and 10 through 16). Tables 1, 2 and 4 of the IBEC Project GHG Analysis included as Attachment G to the IBEC Project AB 987 Application do not change and are therefore not included in this memorandum.

### **Baseline Conditions**

As presented in the IBEC Project AB 987 Application, the baseline annual emissions include operational emissions from the existing LA Clippers Team Offices and LA Clippers Training Center (collectively referred to as the LA Clippers Facilities), LA Clippers games at the Staples Center, market-shifted non-NBA events, and the existing on-site structures that would be removed and replaced with construction of the IBEC Project and IBEC Project Variants. The following updates to the baseline emissions are included in this supplemental submittal. For reference, the following subsections state the corresponding pages of the IBEC Project GHG Analysis included as Attachment G to the IBEC Project AB 987 Application.

### Existing LA Clippers Games at Staples Center (Attachment G, Page 9)

Baseline emissions associated with the existing LA Clippers games at Staples Center were updated to reflect historical attendance and the average annual number of events. The baseline emissions were updated to revise the annual number of existing LA Clippers games from 5 to 3 pre-season games<sup>1</sup> (estimated average attendance of 12,700 attendees). The baseline emissions calculations were also updated to utilize the average reported attendance at Staples Center for the 41 regular season games (average reported attendance of 18,736 attendees), and annual average of 3 post-season games (average reported attendance of 19,355 attendees), based on historical attendance data, with attendee travel characteristics based on recent survey data. Table 5 below presents the refined emission estimates associated with the existing LA Clippers games at Staples Center.

In addition, the emissions calculations have been updated to account for the potential “backfill” of the Staples Center (i.e., utilization of vacated LA Clippers event days to host non-NBA events). As described in more detail in the CSL May 2019 Memorandum (Subject: Staples Center LA Clippers Vacated Event Days Analysis; CSL 2019a) (**Exhibit 1**), based on the number of event days at Staples Center that would be made available for a non-NBA event by the relocation of the LA Clippers to the IBEC Project, and the historical rate at which available event days are booked for non-NBA/non-NHL events at Staples Center during the NBA season, it is reasonably estimated that the maximum potential use of vacated LA Clippers game days at Staples Center would total seven event days. As the type of event that might utilize a vacated LA Clippers game cannot be known, this analysis uses the historical average attendance for non-NBA/non-NHL events at Staples Center, as reported to industry tracker Pollstar (10,440 attendees), to estimate attendance for these seven events. Therefore, this analysis assumes that, after the LA Clippers move to the IBEC Project site, the Staples Center could host an annual average of up to 7 additional events of 10,500 attendees. The emissions associated with use of vacated LA Clippers game days are treated as indirect emissions associated with the IBEC Project. Indirect emissions associated with the potential reuse of the existing LA Clippers Team Offices and LA Clippers vacated event days at Staples Center are now summarized in Table 7a below.

### Existing LA Clippers Facilities (Attachment G, Page 8)

This supplemental memo assumes the existing LA Clippers Training Center facilities in the Playa Vista neighborhood of Los Angeles would be backfilled with a replacement use after the LA Clippers relocate to the IBEC Project. Due to the unique characteristics of the facilities and existing zoning of the site, the future use of the facilities is uncertain; however, this supplemental memo assumes that the Training Center would be backfilled by a use of the same intensity as existing operations. Therefore, these emissions are no longer subtracted to estimate the net new emissions associated with the project. Table 3 on page 15 of Attachment G: IBEC Project GHG Analysis in the IBEC Project AB 987 Application presents the operational emissions associated with the existing LA Clippers Facilities that would be relocated to the IBEC Project Site, including both the LA Clippers Training Center and the LA Clippers Team Offices. The refined Table 3, which replaces that table to include only emissions associated with the existing Team Offices, is included below. In addition, the emissions associated with the potential re-use of the Team Offices are treated as indirect emissions associated with the IBEC Project (see Table 7a below).

<sup>1</sup> Up to 5 pre-season LA Clippers games per year potentially will occur at the IBEC Project arena, but a maximum of 3 pre-season LA Clippers per year are hosted at the Staples Center.

**Table 3. Existing LA Clippers Facilities  
(LA Clippers Team Offices)**

<b>Emissions Source</b>	<b>Operational Emissions (MT CO<sub>2</sub>e)</b>
Area	<0.1
Energy	115
Mobile	212
Waste	9
Water and Wastewater	28
<b>Total</b>	<b>364</b>

Notes: Totals may not add due to rounding.

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent.

Source: Modeled by AECOM in 2019

The refined Table 5 presents the baseline emissions associated with the existing LA Clippers games at Staples Center. As explained previously, the emissions associated with use of vacated LA Clippers event days are treated as indirect emissions associated with the IBEC Project (see Table 7a below).

**Table 5. Existing NBA Games**

<b>Emissions Source</b>	<b>Operational Emissions (MT CO<sub>2</sub>e)</b>
Energy	998
Mobile	5,364
Waste	122
Water and Wastewater	487
<b>Total Baseline Emissions Associated with Existing LA Clippers Games</b>	<b>6,971</b>

Notes: Totals may not add due to rounding.

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent.

Source: Modeled by AECOM in 2019

**Market-Shifted Events (Attachment G, Page 9)**

As stated in the IBEC Project AB 987 Application, it is anticipated that the IBEC Project will host approximately 194 non-NBA events on an average annual basis, including an average of up to 5 large concerts, 8 medium concerts, and 10 small concerts, an average of 20 family shows, and an average of up to 35 other sporting or entertainment events, as well as an average of up to 100 community or corporate events and 16 plaza events. These totals represent the maximum number and type of non-NBA events reasonably anticipated to be hosted at the IBEC Project site on an average annual basis, though the actual total number and type of events may vary year to year. The projections of average annual events at IBEC assume that, in order for the IBEC Project to host this number of events, a portion of the total number of non-NBA events anticipated to be hosted at the IBEC Project site that would otherwise occur at a different venue in the Los Angeles regional market would be “market-shifted” to IBEC, and that some portion of those events would be net new to the Los Angeles regional market and would not otherwise occur absent construction of the IBEC Project.

The analysis included in Attachment G to the IBEC Project AB 987 Application, based on a preliminary assessment by CSL, assumed that 50 percent of all non-NBA events anticipated to be hosted at the IBEC Project would be market-shifted from other existing venues in the region, and 50 percent of the non-NBA events would be new to the regional market. Since submittal of the application, CSL has prepared a more refined market analysis. As discussed in more detail in the CSL report included as

**Exhibit 2** (Los Angeles Incremental Events Analysis, CSL 2019b), based on IBEC utilization projections, an analysis of historical data, and feedback from event promoters, it is estimated that 41 percent of the 78 major non-NBA events anticipated to be hosted at the IBEC Project site would be net new to the market. The CSL analysis states that the event type most likely to be new to the market are the other sporting and entertainment events, followed by concerts, with family shows determined to be relatively stable and the least likely type of new to market event. In addition, the CSL analysis states that the IBEC Project is not anticipated to significantly contribute to growth in the number of corporate or community events in the market, and it is expected that the IBEC Project would host events of those types that would otherwise occur at other locations.

Based on the CSL analysis, this supplemental analysis revises the number of market-shifted events in the baseline from 50 percent to 59 percent for the major non-NBA events and plaza events anticipated to be hosted at IBEC, and 80 percent for corporate and community events, as follows:

Event Type	Number of Anticipated Annual Average Events at IBEC	Percent Market-Shifted	Number of Market-Shifted Events	Percent Net New	Number of Net New Events
Large Concert	5	60%	3	40%	2
Medium Concert	8	60%	5	40%	3
Small Concert	10	60%	6	40%	4
Family Show	20	70%	14	30%	6
Other Sporting or Entertainment Event	35	50%	18	50%	17
Total Major Third-Party Events	78	59%	46	41%	32
Corporate or Community Event	100	80%	80	20%	20
Plaza Event	16	59%	9	41%	7

The refined Table 6, below, presents the operational emissions associated with the existing market-shifted events in the baseline.

Table 6. Market-Shifted Events

Emissions Source	Operational Emissions (MT CO <sub>2</sub> e)
Mobile	2,630
Energy	1,503
Waste	114
Water and Wastewater	497
<b>Total</b>	<b>4,744</b>

Notes: Totals may not add due to rounding.

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent.

Source: Modeled by AECOM in 2019

The refined Table 7, below, presents the total baseline operational emissions estimates with the updates described above.

Table 7. Baseline Emissions Summary

Emissions Source	Proposed IBEC Project	Variants
Area	<0.1	1.35
Energy	2,828	2,836
Mobile	9,130	9,177
Waste	282	283
Water and Wastewater	1,050	1,051
<b>Total</b>	<b>13,289</b>	<b>13,349</b>

Notes: Totals may not add due to rounding.

IBEC = Inglewood Basketball and Event Center

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent.

Source: Modeled by AECOM in 2019

As shown in Table 7, the overall existing baseline emissions would be approximately 13,289 metric tons of carbon dioxide equivalent (MT CO<sub>2</sub>e) for the IBEC Project and 13,349 for the IBEC Project Variants.

Further, as explained previously, emissions associated with the potential reuse of the existing LA Clippers Team Offices and use of the LA Clippers vacated event days after the LA Clippers relocate to the IBEC site are treated as indirect emissions associated with the IBEC Project. Table 7a presents the indirect emissions with these uses year by year.

Table 7a. IBEC Project Indirect Emissions

Emissions Year	IBEC Project Indirect Emissions Re-Use of Team Offices and Vacated NBA Events (MT CO <sub>2</sub> e)
2024 <sup>a</sup>	463
2025	898
2026	872
2027	847
2028	824
2029	802
2030	781
2031	761
2032	742
2033	723
2034	705
2035	688
2036	671
2037	655
2038	639
2039	624
2040	609
2041	594
2042	580
2043	566
2044	552
2045	538
2046	537
2047	537
2048	537
2049	537
2050	536
2051	536
2052	536
2053	536
2054	536
<b>Total</b>	<b>19,960</b>

Notes:

IBEC = Inglewood Basketball and Event Center

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent.

<sup>a</sup> IBEC Project operations are anticipated to start July 1, 2024; thus, the net new emission estimates for 2024 include six months of construction emissions and six months of operational emissions. Similarly, backfill emissions for 2024 only include half of the annual operational emissions associated with the potential reuse of the existing Team Offices and vacated event nights.

**IBEC Project Operations**

As presented in the submitted application, operational emissions associated with the IBEC Project and IBEC Project Variants include emissions from energy (electricity and natural gas), on-road motor vehicles (mobile), solid waste, water and wastewater, and area sources. Given recent information and updated technical analyses, the following emissions sources were refined. For reference, the following subsections state the corresponding pages in the submitted application.

**Mobile Sources (Attachment G, Page 18)**

Mobile source emissions associated with the IBEC Project are based on a project-specific trip generation analysis. As described in more detail in Attachment 2, IBEC Trip Generation Supplemental Technical Memorandum, trip generation rates were refined to reflect more recent survey data and changed conditions. For example, updates to the trip generation analysis included adjustments to

mode splits for attendees and employees to assume less transit and charter bus use considering the availability of additional off-site parking near the IBEC Project. Additionally, the trip generation analysis for the trips at the LA Clippers Team Offices was updated to utilize the Institute of Transportation Engineers (ITE) land use code for Corporate Headquarters. The trip generation analysis also was updated to use the correct ITE trip generation rate for the sports medicine clinic. Further, the GHG analysis has been revised to utilize the maximum, rather than average, number of attendees across all event types to provide a conservative estimate of operational emissions. This supplemental analysis utilizes the maximum attendance numbers as follows:

Event Type	Maximum Number of Attendees
LA Clippers Pre-Season Home Games	18,000
LA Clippers Regular Home Games	18,000
LA Clippers Post-Season Home Games	18,000
Large Concert	18,500
Medium Concert	14,500
Small Concert	9,500
Family Show	8,500
Other Sporting or Entertainment Event	7,500
Corporate or Community Event	2,000
Plaza Event	4,000

Energy (Attachment G, Page 17)

Operational GHG emissions associated with the use of energy in the IBEC Project AB 987 Application were based on projected energy demand at the IBEC Project based on average estimates of attendance. In order to account for the maximum attendance scenario, the projected energy demand has been adjusted in this refined supplemental analysis to an increased estimate of 54 kilo-British thermal units per square foot for components of the IBEC Project expected to experience increased levels of activity assuming maximum event attendance. In addition, the GHG intensity value for Southern California Edison (SCE) in CalEEMod has been updated to reflect recent, publicly available information for projected SCE GHG intensity values for future operational years, consistent with Renewables Portfolio Standard mandates.

Water and Wastewater (Attachment G, Page 19)

Operational GHG emissions associated with the use of energy to supply, distribute, and treat water and wastewater have been updated based on recently available, project-specific data. Water demands in the IBEC Project AB 987 Application were based on projected water use at the IBEC Project based on demand estimates for similar projects and CalEEMod defaults, estimated to be approximately 44 million gallons for indoor water use and 16 million gallons for outdoor water use, absent application of the IBEC Project design features to reduce water demand. Since the January 2019 submittal, Stetson Engineers, Inc. prepared a water demand study for the IBEC Project that includes project-specific data and water demands – both with Leadership in Energy and Environmental Design (LEED) Gold features and without LEED Gold features. (**Exhibit 3**). The project-specific water demand is approximately 22.6 million gallons and 4.8 million gallons of indoor and outdoor water usage, respectively. It is anticipated that the IBEC Project’s LEED design features will result in an indoor and outdoor water demand reduction of 41 percent and 51 percent, respectively (Stetson 2019).

**IBEC Project Operational Emissions Results**

Annual operational emissions have been updated, as discussed above. Emissions sources and estimates in Attachment G that are not mentioned above have not been refined or updated. The refined Table 8 below presents the emissions associated with operation of the IBEC Project and IBEC Project Variants with and without GHG Reduction Measures for the first year of operation. The emissions presented in the table below represent the total emissions if the IBEC Project were operational for the entirety of 2024. However, the first day of operation of the IBEC Project is anticipated to be July 1, 2024. As noted in Attachment G to the IBEC Project AB 987 Application, for the calculation of total net new emissions for the life of the IBEC Project, emissions for 2024 are reduced by 50 percent to estimate the emissions for the actual operations of the IBEC Project for that year. Tables 10 through 13 below show the the operations of the IBEC Project over the project lifetime. Updated appendix materials are included in Appendix A.

Table 8. IBEC Project Operational GHG Emissions – 2024

<b>Emissions Source</b>	<b>Operational Emissions without GHG Reduction Measures (MT CO<sub>2</sub>e)</b>	<b>Operational Emissions with Local Direct GHG Reduction Measures <sup>1</sup> (MT CO<sub>2</sub>e)</b>	<b>Operational Emissions with All GHG Reduction Measures <sup>2</sup> (MT CO<sub>2</sub>e)</b>
Area	0.1	0.1	0.1
Energy	5,679	5,472	5,265
Mobile	16,883	13,643	13,643
Stationary	87	87	87
Waste	1,207	1,207	1,207
Water and Wastewater	136	110	84
<b>Total Operational Emissions</b>	<b>23,992</b>	<b>20,520</b>	<b>20,287</b>

Notes: Totals may not add due to rounding.

<sup>1</sup> Includes reductions associated with implementation of the TDM Program and 50% of the reductions achieved through LEED Gold.

<sup>2</sup> Includes reductions associated with implementation of the TDM Program and 100% of the reductions achieved through LEED Gold.

GHG = greenhouse gas

LEED = Leadership in Energy and Environmental Design

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent

PDF = project design features

TDM = Transportation Demand Management

Source: Modeled by AECOM in 2019

**IBEC Project Construction**

Due to recent refinements in the project parking configuration, construction emissions associated with the IBEC Project were also revised. Attachment G to the IBEC Project AB 987 Application included emissions for construction of two parking structures and one surface parking lot. The design now includes construction of a third parking structure instead of the surface parking lot, which would provide two additional levels of parking. As such, the construction emissions in this supplemental analysis were revised to account for the minor changes in parking spaces and the additional concrete deliveries during construction of the third parking structure and other construction activities associated with the additional parking structure. The refined Table 9 below presents the construction-related GHG emissions for the IBEC Project and IBEC Project Variants.



Table 9. Construction-Related GHG Emissions

Construction Year	IBEC Project GHG Emissions (MT CO <sub>2</sub> e)	IBEC Project Variants GHG Emissions (MT CO <sub>2</sub> e)
2021 <sup>a</sup>	3,834	3,860
2022	8,373	8,373
2023	7,437	7,437
2024 <sup>b</sup>	1,188	1,188
<b>Total</b>	<b>20,833</b>	<b>20,859</b>

Notes: Totals may not add due to rounding.

GHG = greenhouse gas

IBEC = Inglewood Basketball and Event Center

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent.

<sup>a</sup> Construction in 2021 is anticipated to only occur July through December.

<sup>b</sup> Construction in 2024 is anticipated to only occur January through June.

Source: Modeled by AECOM in 2019

### Emission Results

As discussed above, this supplemental refined analysis includes updates to baseline emission estimates and methodology, indirect emissions from backfill of the existing LA Clippers team office space and events during vacated LA Clippers event days at the Staples Center, IBEC Project water, mobile, and energy source emission estimates, and updates to construction-related estimates. The following tables present the net GHG emissions by year for the IBEC Project and IBEC Project Variants.

#### IBEC Project Emission Results

The refined Table 10 shows the adjusted change in GHG emissions by year for the IBEC Project between 2021 and 2054 without GHG Reduction Measures. The refined Table 11 shows the net change in emissions with the GHG Reduction Measures.

As shown in refined Table 11, the emissions generated by the IBEC Project when considering the Transportation Demand Management (TDM) Program and project design features, would result in a net increase of 76,324 MT CO<sub>2</sub>e in emissions when compared to the baseline.

Table 10. IBEC Project - Net GHG Emissions by Year without GHG Reduction Measures

Emissions Year	IBEC Project (MT CO <sub>2</sub> e)	Baseline Emissions (MT CO <sub>2</sub> e)	Net Emissions IBEC Project (MT CO <sub>2</sub> e)
2021 <sup>a,b</sup>	3,834	1,209	2,625
2022 <sup>a,b</sup>	8,373	1,209	7,164
2023 <sup>a,b</sup>	7,437	1,209	6,228
2024 <sup>c</sup>	13,647	7,249	6,398
2025	24,141	13,289	10,852
2026	23,466	13,289	10,177
2027	22,861	13,289	9,572
2028	22,316	13,289	9,027
2029	21,822	13,289	8,533
2030	21,373	13,289	8,084
2031	20,795	13,289	7,505
2032	20,222	13,289	6,933
2033	19,684	13,289	6,395
2034	19,178	13,289	5,889
2035	18,702	13,289	5,413
2036	18,254	13,289	4,965
2037	17,831	13,289	4,542
2038	17,431	13,289	4,142
2039	17,049	13,289	3,760
2040	16,684	13,289	3,395
2041	16,333	13,289	3,044
2042	15,994	13,289	2,704
2043	15,663	13,289	2,374
2044	15,340	13,289	2,051
2045	15,023	13,289	1,733
2046	15,004	13,289	1,715
2047	14,989	13,289	1,700
2048	14,977	13,289	1,688
2049	14,967	13,289	1,678
2050	14,959	13,289	1,669
2051	14,959	13,289	1,669
2052	14,959	13,289	1,669
2053	14,959	13,289	1,669
2054	14,959	13,289	1,669
<b>Total</b>	<b>568,187</b>	<b>409,556</b>	<b>158,631</b>

Notes:

Total may not add due to rounding.

<sup>a</sup> Project emission estimates for 2021 through 2023 include only construction-related emissions.

<sup>b</sup> Baseline emission estimates for 2021 through 2023 include only emissions associated with the existing on-site buildings that would be removed at the start of construction.

<sup>c</sup> IBEC Project operations are anticipated to start July 1, 2024; thus, the net new emission estimates for 2024 include six months of construction emissions and six months of operational emissions. Similarly, baseline emissions for 2024 only include half of the existing annual operational emissions associated with the LA Clippers Facilities, existing LA Clippers games, and market-shifted non-NBA events.

GHG = greenhouse gas

IBEC = Inglewood Basketball and Event Center

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent

Source: Modeled by AECOM in 2019

**Table 11. IBEC Project - Net GHG Emissions by Year with GHG Reduction Measures**

<b>Emissions Year</b>	<b>IBEC Project (MT CO<sub>2</sub>e)</b>	<b>Baseline Emissions (MT CO<sub>2</sub>e)</b>	<b>Net Emissions IBEC Project (MT CO<sub>2</sub>e)</b>
2021 <sup>a,b</sup>	3,834	1,209	2,625
2022 <sup>a,b</sup>	8,373	1,209	7,164
2023 <sup>a,b</sup>	7,437	1,209	6,228
2024 <sup>c</sup>	11,795	7,249	4,545
2025	20,575	13,289	7,286
2026	20,020	13,289	6,731
2027	19,522	13,289	6,232
2028	19,071	13,289	5,782
2029	18,661	13,289	5,372
2030	18,288	13,289	4,998
2031	17,787	13,289	4,498
2032	17,291	13,289	4,001
2033	16,823	13,289	3,533
2034	16,380	13,289	3,091
2035	15,961	13,289	2,672
2036	15,566	13,289	2,276
2037	15,190	13,289	1,901
2038	14,833	13,289	1,544
2039	14,514	13,289	1,225
2040	14,181	13,289	892
2041	13,862	13,289	573
2042	13,551	13,289	262
2043	13,248	13,289	-41
2044	12,951	13,289	-338
2045	12,658	13,289	-631
2046	12,642	13,289	-647
2047	12,629	13,289	-660
2048	12,618	13,289	-671
2049	12,609	13,289	-680
2050	12,602	13,289	-688
2051	12,602	13,289	-688
2052	12,602	13,289	-688
2053	12,602	13,289	-688
2054	12,602	13,289	-688
<b>Total</b>	<b>485,880</b>	<b>409,556</b>	<b>76,324</b>

Notes:

Total may not add due to rounding.

<sup>a</sup> Project emission estimates for 2021 through 2023 include only construction-related emissions.

<sup>b</sup> Baseline emission estimates for 2021 through 2023 include only emissions associated with the existing on-site buildings that would be removed at the start of construction.

<sup>c</sup> IBEC Project operations are anticipated to start July 1, 2024; thus, the net new emission estimates for 2024 include six months of construction emissions and six months of operational emissions. Similarly, baseline emissions for 2024 only include half of the existing annual operational emissions associated with the LA Clippers Facilities, existing LA Clippers games, and market-shifted non-NBA events.

GHG = greenhouse gas

IBEC = Inglewood Basketball and Event Center

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent

Source: Modeled by AECOM in 2019

**IBEC Project Variants Emission Results**

The refined Table 12 shows the adjusted change in GHG emissions by year for the IBEC Project Variants between 2021 and 2054 without GHG Reduction Measures. The refined Table 13 shows the adjusted net change in emissions for the IBEC Project Variants with the GHG Reduction Measures.

Table 12. IBEC Project Variants - Net GHG Emissions by Year without GHG Reduction Measures

Emissions Year	Variants (MT CO <sub>2</sub> e)	Baseline Emissions (MT CO <sub>2</sub> e)	Net Emissions IBEC Project (MT CO <sub>2</sub> e)
2021 <sup>a,b</sup>	3,860	1,269	2,591
2022 <sup>a,b</sup>	8,373	1,269	7,105
2023 <sup>a,b</sup>	7,437	1,269	6,168
2024 <sup>c</sup>	13,647	7,309	6,339
2025	24,141	13,349	10,793
2026	23,466	13,349	10,118
2027	22,861	13,349	9,513
2028	22,316	13,349	8,968
2029	21,822	13,349	8,474
2030	21,373	13,349	8,025
2031	20,795	13,349	7,446
2032	20,222	13,349	6,873
2033	19,684	13,349	6,336
2034	19,178	13,349	5,830
2035	18,702	13,349	5,354
2036	18,254	13,349	4,905
2037	17,831	13,349	4,483
2038	17,431	13,349	4,082
2039	17,049	13,349	3,701
2040	16,684	13,349	3,335
2041	16,333	13,349	2,985
2042	15,994	13,349	2,645
2043	15,663	13,349	2,315
2044	15,340	13,349	1,992
2045	15,023	13,349	1,674
2046	15,004	13,349	1,655
2047	14,989	13,349	1,641
2048	14,977	13,349	1,629
2049	14,967	13,349	1,619
2050	14,959	13,349	1,610
2051	14,959	13,349	1,610
2052	14,959	13,349	1,610
2053	14,959	13,349	1,610
2054	14,959	13,349	1,610
<b>Total</b>	<b>568,213</b>	<b>411,570</b>	<b>156,643</b>

Notes:

Total may not add due to rounding.

<sup>a</sup> Project emission estimates for 2021 through 2023 include only construction-related emissions.

<sup>b</sup> Baseline emission estimates for 2021 through 2023 include only emissions associated with the existing on-site buildings that would be removed at the start of construction.

<sup>c</sup> IBEC Project operations are anticipated to start July 1, 2024; thus, the net new emission estimates for 2024 include six months of construction emissions and six months of operational emissions. Similarly, baseline emissions for 2024 only include half of the existing annual operational emissions associated with the LA Clippers Facilities, existing LA Clippers games, and market-shifted non-NBA events.

GHG = greenhouse gas

IBEC = Inglewood Basketball and Event Center

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent

Source: Modeled by AECOM in 2019

Table 13. IBEC Project Variants - Net GHG Emissions by Year with GHG Reduction Measures

Emissions Year	Variants (MT CO <sub>2</sub> e)	Baseline Emissions (MT CO <sub>2</sub> e)	Net Emissions IBEC Project (MT CO <sub>2</sub> e)
2021 <sup>a,b</sup>	3,860	1,269	2,591
2022 <sup>a,b</sup>	8,373	1,269	7,105
2023 <sup>a,b</sup>	7,437	1,269	6,168
2024 <sup>c</sup>	11,795	7,309	4,486
2025	20,575	13,349	7,227
2026	20,020	13,349	6,672
2027	19,522	13,349	6,173
2028	19,071	13,349	5,723
2029	18,661	13,349	5,313
2030	18,288	13,349	4,939
2031	17,787	13,349	4,438
2032	17,291	13,349	3,942
2033	16,823	13,349	3,474
2034	16,380	13,349	3,031
2035	15,961	13,349	2,613
2036	15,566	13,349	2,217
2037	15,190	13,349	1,842
2038	14,833	13,349	1,484
2039	14,514	13,349	1,165
2040	14,181	13,349	833
2041	13,862	13,349	514
2042	13,551	13,349	203
2043	13,248	13,349	-100
2044	12,951	13,349	-397
2045	12,658	13,349	-690
2046	12,642	13,349	-707
2047	12,629	13,349	-719
2048	12,618	13,349	-730
2049	12,609	13,349	-739
2050	12,602	13,349	-747
2051	12,602	13,349	-747
2052	12,602	13,349	-747
2053	12,602	13,349	-747
2054	12,602	13,349	-747
<b>Total</b>	<b>485,906</b>	<b>411,570</b>	<b>74,335</b>

Notes:

Total may not add due to rounding.

<sup>a</sup> Project emission estimates for 2021 through 2023 include only construction-related emissions.

<sup>b</sup> Baseline emission estimates for 2021 through 2023 include only emissions associated with the existing on-site buildings that would be removed at the start of construction.

<sup>c</sup> IBEC Project operations are anticipated to start July 1, 2024; thus, the net new emission estimates for 2024 include six months of construction emissions and six months of operational emissions. Similarly, baseline emissions for 2024 only include half of the existing annual operational emissions associated with the LA Clippers Facilities, existing LA Clippers games, and market-shifted non-NBA events .

GHG = greenhouse gas

IBEC = Inglewood Basketball and Event Center

MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent

Source: Modeled by AECOM in 2019

As shown in refined Table 13, the emissions generated by the IBEC Project Variants with the GHG Reduction Measures would result in a net increase of 74,335 MT CO<sub>2</sub>e in emissions when compared to the baseline.

#### Net New Project Emissions and AB 987 Requirements

As shown above in refined Tables 10 and 12, the IBEC Project and IBEC Project Variants would result in net new GHG emissions of approximately 158,631 MT CO<sub>2</sub>e and approximately 156,643 MT CO<sub>2</sub>e, respectively, absent implementation of GHG Reduction Measures.

The refined Tables 14 and 15 below show the net new emissions produced by the IBEC Project and the IBEC Project Variants without GHG Reduction Measures (i.e., without implementation of the IBEC TDM Program or any of the project design features and measures used as part of the LEED Gold strategy), the net new emissions produced by the IBEC Project and IBEC Project Variants after applying the reductions resulting from implementation of the local, direct GHG Reduction Measures (i.e., with implementation of the IBEC TDM Program and 50 percent of the project design features and measures used as part of the LEED Gold strategy), and the net new emissions produced by the IBEC Project and IBEC Project Variants after application of all GHG Reduction Measures (i.e., with implementation of the IBEC TDM Program and all of the project design features and measures used as part of the LEED Gold certification strategy).

**IBEC Project Net New Emissions**

Table 14. IBEC Project Net New Emissions Summary

<b>Emissions Year</b>	<b>IBEC Project without GHG Reduction Measures (No TDM or PDFs)</b>	<b>IBEC Project with Local, Direct GHG Reduction Measures (TDM and 50% PDFs)</b>	<b>IBEC Project with GHG Reduction Measures (TDM and 100% PDFs)</b>
2021	2,625	2,625	2,625
2022	7,164	7,164	7,164
2023	6,228	6,228	6,228
2024	6,398	4,662	4,545
2025	10,852	7,516	7,286
2026	10,177	6,958	6,731
2027	9,572	6,456	6,232
2028	9,027	6,002	5,782
2029	8,533	5,589	5,372
2030	8,084	5,213	4,998
2031	7,505	4,701	4,498
2032	6,933	4,193	4,001
2033	6,395	3,714	3,533
2034	5,889	3,260	3,091
2035	5,413	2,831	2,672
2036	4,965	2,424	2,276
2037	4,542	2,037	1,901
2038	4,142	1,669	1,544
2039	3,760	1,339	1,225
2040	3,395	995	892
2041	3,044	665	573
2042	2,704	343	262
2043	2,374	29	-41
2044	2,051	-279	-338
2045	1,733	-584	-631
2046	1,715	-600	-647
2047	1,700	-613	-660
2048	1,688	-623	-671
2049	1,678	-632	-680
2050	1,669	-640	-688
2051	1,669	-640	-688
2052	1,669	-640	-688
2053	1,669	-640	-688
2054	1,669	-640	-688
<b>Total</b>	<b>158,631</b>	<b>80,079</b>	<b>76,324</b>

Notes:

- GHG = greenhouse gas
- LEED = Leadership in Energy and Environmental Design
- PDF = project design features
- TDM = Transportation Demand Management

As shown in the refined Table 14, the emissions generated by the IBEC Project with implementation of the GHG Reduction Measures, would result in a net increase of 76,324 MT CO<sub>2</sub>e in emissions when compared to the baseline.



**IBEC Project Variants Net New Emissions**

Table 15. IBEC Project Variants Project Net New Emissions Summary

Emissions Year	IBEC Project Without GHG Reduction Measures (No TDM or PDFs)	IBEC Project With Local, Direct GHG Reduction Measures (TDM and 50% PDFs)	Project With GHG Reduction Measures (TDM and 100% PDFs)
2021	2,591	2,591	2,591
2022	7,105	7,105	7,105
2023	6,168	6,168	6,168
2024	6,339	4,602	4,486
2025	10,793	7,456	7,227
2026	10,118	6,898	6,672
2027	9,513	6,396	6,173
2028	8,968	5,943	5,723
2029	8,474	5,530	5,313
2030	8,025	5,153	4,939
2031	7,446	4,641	4,438
2032	6,873	4,134	3,942
2033	6,336	3,655	3,474
2034	5,830	3,201	3,031
2035	5,354	2,772	2,613
2036	4,905	2,365	2,217
2037	4,483	1,978	1,842
2038	4,082	1,610	1,484
2039	3,701	1,280	1,165
2040	3,335	936	833
2041	2,985	605	514
2042	2,645	284	203
2043	2,315	-30	-100
2044	1,992	-339	-397
2045	1,674	-643	-690
2046	1,655	-659	-707
2047	1,641	-672	-719
2048	1,629	-683	-730
2049	1,619	-692	-739
2050	1,610	-699	-747
2051	1,610	-699	-747
2052	1,610	-699	-747
2053	1,610	-699	-747
2054	1,610	-699	-747
<b>Total</b>	<b>156,643</b>	<b>78,090</b>	<b>74,335</b>

Notes:  
 GHG = greenhouse gas  
 LEED = Leadership in Energy and Environmental Design  
 PDF = project design features  
 TDM = Transportation Demand Management

As shown in refined Table 15, the emissions generated by the IBEC Project Variants with implementation of the GHG Reduction Measures would result in a net increase of 74,335 MT CO<sub>2</sub>e in emissions when compared to the baseline.

**AB 987 Summary of Reductions**

AB 987 requires that not less than 50 percent of the net new GHG emissions produced by the IBEC Project without GHG Reduction Measures must be reduced by local, direct measures, including the reductions in emissions resulting from implementation of the IBEC TDM Program and 50% of the

reductions resulting from the LEED Gold strategy. The refined Tables 16 and 17 identify the reductions that would be achieved through these local, direct measures and the remaining GHG emission reductions required that would need to be achieved through the additional 50% of LEED Gold measures, purchase of offset credits, and/or co-benefits from emission reduction measures for nitrogen oxides (NO<sub>x</sub>) and particulate matter with aerodynamic diameter less than 2.5 microns (PM<sub>2.5</sub>).

Table 16. IBEC Project Local Direct Measures Emissions Reductions and Offsets Summary

<b>IBEC Project Condition and Reductions</b>	<b>Emissions Estimates (MT CO<sub>2</sub>e)</b>	<b>Percent of Net New Emissions</b>
Total Net New Emissions IBEC Project Without GHG Reduction Measures	158,631	100%
Required GHG Reductions from Local, Direct Measures	79,316	50%
Total Emissions Reductions from LEED Gold	7,510	5%
50% of Total Emission Reductions from LEED Gold Qualifying as Local Direct Measures	3,755	2%
Total Reductions from IBEC TDM Program	74,797	47%
Total Amount of Reductions from Local, Direct Measures (TDM Program and 50% of LEED Gold)	78,552	49.5%
Total Amount of Reductions from GHG Reduction Measures (TDM Program and 100% of LEED Gold)	82,307	52%
Additional Reductions Needed from Offset Credits and/or Co-benefits of NO <sub>x</sub> and PM <sub>2.5</sub> Reduction Measures	76,324	48%
<b>Total Net New Emissions</b>	<b>0</b>	<b>0%</b>

Notes: Totals may not add due to rounding.

- GHG = greenhouse gas
- LEED = Leadership in Energy and Environmental Design
- MT CO<sub>2</sub>e = metric tons carbon dioxide equivalents
- NO<sub>x</sub> = nitrogen oxides
- PDF = project design features
- PM<sub>2.5</sub> = particulate matter with aerodynamic diameter less than 2.5 microns
- TDM = Transportation Demand Management

Table 17. IBEC Project Variants Local Direct Emissions Reductions and Offsets Summary

<b>Project Condition and Reductions</b>	<b>Emissions Estimates (MT CO<sub>2</sub>e)</b>	<b>Percent of Net New Emissions</b>
Total Net New Emissions IBEC Project Variants Without GHG Reduction Measures	156,643	100%
Required GHG Reductions from Local, Direct Measures	78,321	50%
Total Emissions Reductions from LEED Gold	7,510	5%
50% of Total Emission Reductions from LEED Gold Qualifying as Local Direct Measures	3,755	2%
Total Reductions from IBEC TDM Program	74,797	48%
Total Amount of Reductions from Local, Direct Measures (TDM Program and 50% of LEED Gold)	78,552	50.1%
Total Amount of Reductions from GHG Reduction Measures (TDM Program and 100% of LEED Gold)	82,307	53%
Additional Reductions Needed from Offset Credits and/or Co-benefits of NO <sub>x</sub> and PM <sub>2.5</sub> Reduction Measures	74,335	47%
Total Net New Emissions	0	0%

Notes: Totals may not add due to rounding.

- GHG = greenhouse gas
- LEED = Leadership in Energy and Environmental Design
- MT CO<sub>2</sub>e = metric tons carbon dioxide equivalents
- NO<sub>x</sub> = nitrogen oxides
- PDF = project design features
- PM<sub>2.5</sub> = particulate matter with aerodynamic diameter less than 2.5 microns
- TDM = Transportation Demand Management

As shown in refined Table 16, with implementation of the IBEC TDM Program and 50% of the GHG emissions reductions resulting from the LEED Gold strategy, the IBEC Project would be just under the AB 987 requirement that no less than 50 percent of the net new emissions need to be offset by local, direct measures. As shown in Table 17, the IBEC Project Variant would meet the AB 987 requirement that no less than 50 percent of net new emissions need to be offset by local, direct measures. Therefore, the following section discusses potential options that could be implemented by the IBEC Project to meet the AB 987 requirement that no less than 50 percent of the net new emissions need to be offset by local, direct measures.

**Additional Local, Direct Measures**

As shown in Table 16, the IBEC Project would need to implement additional local, direct measures to reduce emissions of approximately 764 MT CO<sub>2</sub>e of GHGs over the project lifetime to meet the AB 987 requirement that no less than 50 percent of net new GHG emissions need to be offset by local, direct measures. The IBEC Project will include one or more additional local, direct measures to meet this requirement, potentially including, but not limited to:

**Additional Renewable Energy Production via Photovoltaic Systems on Carports**

The IBEC Project may install additional photovoltaic systems as carports on the additional third parking structure. It is estimated that an additional 500-kilowatt PV system would generate up to an additional 850,000 kilowatt-hours of clean energy and achieve up to 2,440 MT CO<sub>2</sub>e of GHG emissions reductions over the project lifetime.

## **Southern California Edison (SCE) Green Rate**

The SCE Green Rate allows electricity customers to purchase renewable energy for their onsite energy consumption. To support this effort, SCE purchases renewable energy to meet the needs of Green Rate participants from solar renewable developers within the SCE service territory. Under the SCE Green Rate program, customers may select from two levels of participation, either to meet 50 or 100 percent of electricity usage from solar energy sources. It is estimated that the 100 percent participation level would achieve up to 52,889 MT CO<sub>2</sub>e of GHG emissions reductions over the project lifetime. This reduction strategy would not be part of the LEED process and as such, it would not be subject to the limit of 50% of the LEED Gold certification as a part of the AB 987 local, direct reduction requirement.

## **Renewable Natural Gas**

Another option for meeting the project's required level of GHG emissions reductions from local, direct measures relates to utilizing the proposed Southern California Gas Company renewable gas program that is currently in a review and approval process at the California Energy Commission. If the program is approved, customers served by Southern California Gas Company would be able to specify that a portion or all of their natural gas would come from renewable sources. Renewable natural gas comes from existing waste streams and a variety of biomass sources. If the renewable natural gas comes from sources that would otherwise decay and create methane emissions, this has a direct GHG emissions reduction benefit. The lifecycle emissions for renewable natural gas have the potential to be lower than the emissions associated with conventional natural gas.<sup>2</sup> Assuming the renewable natural gas would be 100 percent carbon neutral and would replace all the natural gas consumption at the IBEC Project site, this measure could achieve up to 31,010 MT CO<sub>2</sub>e over the project lifetime. This reduction strategy would not be part of the LEED Gold certification process and as such, it would not be subject to the limit that no more than 50% of the project design features and measures used as part of the IBEC Project's LEED Gold strategy may be counted as local, direct reduction measures under AB 987.

Other local direct measures could include the identification and incorporation of new emissions-reducing technologies, pursuing strategies to work with local municipalities, transit providers, and others in the area to support vehicle trip or vehicle-miles traveled reductions that would in turn reduce GHG emissions, or other measures that would achieve GHG emissions reductions in the local region.

## **Summary**

Therefore, as required by AB 987, the IBEC Project would implement additional local, direct measures as necessary to meet the requirement that no less than 50 percent of net new emissions need to be offset by local, direct measures. Further, any remaining net new emissions after implementation of the additional local, direct measures would need to be offset by the purchase of carbon credits and/or co-benefits of NO<sub>x</sub> and PM<sub>2.5</sub> reduction measures.

## **References**

AECOM 2019. Attachment 2: IBEC Annual Trip Generation Supplemental Technical Memorandum. June 3, 2019

Exhibit 1: CSL 2019a. Staples Center LA Clippers Vacated Event Days Analysis. May 14, 2019.

Exhibit 2: CSL 2019b. LA Clippers Arena Incremental Event Analysis. May 16, 2019.

Exhibit 3: Stetson Engineers, Inc. 2019. IBEC Project Review of Water Demands. June 3, 2019.

<sup>2</sup> California Air Resources Board (ARB) and the California Environmental Protection Agency (EPA). 2016 (June). The Feasibility of Renewable Natural Gas as a Large-Scale, Low Carbon Substitute. Available: <https://ww3.arb.ca.gov/research/apr/past/13-307.pdf>.

**Attachment 4**

**Letter Confirming Project Labor Agreement**



**RON MILLER**  
*Executive Secretary*

**Los Angeles / Orange Counties  
Building and Construction  
Trades Council**

*Affiliated with the Building & Construction Trades Dept., AFL-CIO*

1626 Beverly Boulevard  
Los Angeles, CA 90026-5784  
Phone (213) 483-4222  
(714) 827-6791  
Fax (213) 483-4419



April 4, 2019

Re: LA Clippers Arena Project Labor Agreement

To whom it may concern:

This is to confirm that the Los Angeles/Orange County Building and Construction Trades Council, on behalf of its affiliated Local Unions and District Councils, has entered into a project labor agreement (PLA) for the construction of the LA Clippers' new NBA arena project in Inglewood. The PLA was entered into with Hunt Construction Group, the project's general contractor selected by Murphy's Bowl LLC, the project owner. The PLA covers the horizontal improvements and the vertical construction of the Inglewood Basketball and Entertainment Center Project.

If you have questions, feel free to give me a call.

Sincerely,

Ron Miller  
Executive Secretary