

emissions

standards

★ Note:

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language in

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pg.

3.2-65

construction equipment meeting

Construction of the Proposed Project has the potential to temporarily emit air pollutants through the use of heavy-duty construction equipment, through vehicle trips generated from workers and haul trucks traveling to and from the Project Site, from demolition and various soil-handling activities, and from the use of diesel powered on-and off-road vehicles and equipment. In addition, fugitive dust emissions would result. Because of the size and number of overlapping construction activities, even with implementation of construction project design features, such as use of Tier 4 Final or equivalent construction equipment, dust control measures, and maximizing the use of electric-powered construction equipment, construction-related daily emissions would exceed the SCAQMD significance threshold for NOx.

The type and magnitude of the significance threshold exceedances as a result of project operations would depend on the type of event-day at the Proposed Project. On event days when a plaza event or a civic or corporate event takes place at the Project Site, there would be no exceedances of regional daily significance thresholds. Similarly, there would be no exceedances of these thresholds on non-event days, with the exception of two non-event days per month when the Proposed Project backup generators would be tested. The testing of these generators, in combination with the Proposed Project emissions associated with a non-event day, would result in an exceedance of the threshold for NOx, an ozone and nitrogen dioxide (NO2) precursor. On the less frequent days with larger events additional thresholds would be exceeded; on days with NBA basketball games or major concerts (approximately 62 per year), the thresholds for ozone precursors (VOC and NOx), CO, PM10, and PM2.5 would be exceeded.

A detailed analysis of the health effects of the increases in ozone precursors and PM2.5 was undertaken using the best available tools designed to predict the health effects of changes in air basin-wide emissions. On a percentage basis, the increased emissions from the Proposed Project would be extremely small in the context of the South Coast Air Basin. The analysis finds that no statistically significant changes in health conditions would occur, and that no meaningful conclusion can be drawn with respect to potential health effects from the criteria pollutant emissions of the Proposed Project.

The vast majority of air pollutant emissions are generated by the operation of vehicles and off-road equipment, including passenger cars and light trucks, delivery trucks and service vehicles, and construction equipment in varying degrees throughout the construction and operational phases. As proposed, the Proposed Project would implement all feasible construction emissions reduction measures, including use of Tier 4 Final or equivalent construction equipment, use of electric and alternative-fueled construction equipment where possible, regular application of water to areas where soil is disturbed or on roads, and stoppage of emission generating construction activity during State 2 smog alerts. Mitigation of operational emissions is focused on decreasing use of private vehicles for travel to and from the Proposed Project. As described in further detail below, under Transportation, the mitigation measure for operational emissions requires a comprehensive Transportation Demand Management program that support increased use of transit, carpool and vanpool, and other alternative modes of transportation, thereby reducing the motor vehicle emissions associated with the Proposed Project.

match edit above

along with implementation of a construction emissions minimization plan.

## Hazards and Hazardous Materials

The Hazards and Hazardous Materials section addresses potential effects of the Proposed Project that could result in exposure of people to hazards or hazardous materials that may be present in or on the Project Site or as a result of construction or operation of the Proposed Project. Based on searches of environmental database and collection of on-site soil and soil gas samples, the Project Site is located in an area that includes a number of former land uses with a history of hazardous materials uses and some instances of unauthorized releases. Soil sampling undertaken for this Draft EIR confirms the potential for encountering contaminants of concern that could result in adverse health effects if not handled appropriately. In addition, structures on the Project Site that would be demolished prior to construction of the Proposed Project could contain hazardous building materials that would require appropriate identification, handling and disposal. The potential exposure of construction workers or nearby residents and workers to these existing hazards would be mitigated through compliance with existing State and federal laws and regulations, and through implementation of a Soil Management Plan approved by the Los Angeles County Health Hazardous Materials Division (HHMD) prior to initiating any demolition or ground disturbing activities on the Project Site.

The Project Site is located within the planning boundary/Airport Influence Area for LAX, but not for Hawthorne Municipal Airport (HHR). ~~The Proposed Project would be designed, constructed, and operated to adhere to FAA regulations, with the exceptions that the height of the Arena Structure (up to 150 feet above grade) and the arena construction cranes (up to approximately 290 feet above mean sea level) would penetrate imaginary surfaces that are used by the FAA to ensure the safety of aircraft operations at the two airports. The EIR includes mitigation that would require the applicant to submit a Notice of Proposed Construction or Alteration to the FAA, after which the FAA would prepare an aeronautical study to determine whether the Proposed Project would include obstructions to the airspace that would constitute a hazard to air navigation. The Proposed Project would be required to implement all FAA requirements, and to provide the City with a copy of the FAA "Determination of No Hazard to Air Navigation", and a consistency determination by the Airport Land Use Commission prior to the issuance of building permits. Because the Proposed Project would be constructed to be consistent with the requirements of the FAA, the impact on aviation hazards would be less than significant.~~

*credit*

*credits for consistency with final haz section.*

## Hydrology and Water Quality

The Hydrology and Water Quality section describes impacts of the Proposed Project on flooding and ground- and surface-water quality. The existing storm drainage facilities in the vicinity of the Project Site lead to the Los Angeles River and do not flood during intense storms. The Proposed Project's drainage systems have not yet been designed, and it is possible that the Proposed Project could exacerbate existing conditions. Mitigation measures requiring the Proposed Project stormwater systems to be designed consistent with local regulations and ensuring that runoff from the Project Site entering the City's drainage systems would not exceed current peak flows would reduce this potential impact to insignificance.

(18,000 persons) NBA basketball game, and weekday post-event condition for a sold-out (18,500 persons) concert. These periods were selected for evaluation because they represent the most concentrated estimated arrival and departure patterns for major events at the Proposed Project.

Based on the analysis under the Adjusted Baseline scenario, major events at the Proposed Project, added onto the traffic from ancillary uses, would result in significant impacts at 40 intersections during the weekday pre-event peak hour, 11 intersections in the weekday post-event peak hour, and 26 intersections in the weekend pre-event peak hour. The major events would also result in significant impacts to four neighborhood street segments. Major events at the proposed arena were also predicted to result in significant impacts on up to six freeway components in a single peak hour on I-405 and on I-105, and queuing impacts on three freeway off-ramps.

Impact  
3.14-3

Says

42

intersections

Under the cumulative conditions the number of impacts of major events at the Proposed Project, added onto the traffic from ancillary uses, would increase, resulting in significant impacts at 60 intersections during the weekday pre-event peak hour, 21 intersections in the weekday post-event peak hour, and 40 intersections in the weekend pre-event peak hour. The major events under cumulative conditions would also result in significant impacts to six neighborhood street segments. Major events at the Proposed Project were also predicted to result in significant impacts on up to eight freeway components in a single peak hour on I-405 and I-105, and queuing impacts on three freeway off-ramps.

Traffic congestion from major events could significantly impact the on-time performance of local buses during pre- and post-event periods. However, while the capacity of local bus routes and the Green Line could be exceeded in the post-event period, because the effects would be limited to increased wait time and not involve safety or operational issues, those would not be considered to be significant impacts.

The local pedestrian system, made up of sidewalks and crosswalks that would connect the proposed arena and plaza to nearby parking and other businesses would be heavily used before and after a major event at the Proposed Project. Based on the analysis, all aspects of the pedestrian system would operate acceptably, except for where there could be substantial crowding on the West Century Boulevard south sidewalk, between the proposed arena plaza and South Doty Avenue, as well as on the east leg crosswalk at West Century Boulevard and South Prairie Avenue, and the south leg crosswalk at West Century Boulevard and South Doty Avenue. Crowding on the east leg crosswalk at West Century Boulevard and South Prairie Avenue would be considered a significant impact.

Traffic congestion from major events could have a significant impact on emergency access by resulting in slower travel times for emergency vehicles and other persons in private vehicles to access the emergency room at the Centinela Hospital Medical Center during pre- and post-event periods. The EIR includes a mitigation measure requiring the Proposed Project to develop and implement a Local Hospital Access Plan, and specific components thereof, to ensure that safe and timely routes to the hospital are provided in all pre- and post-event scenarios. These include, but

are not limited to, a system of wayfinding signs and other communications to direct drivers to alternative routes to Centinela Hospital, and ongoing coordination between the City, Centinela Hospital, and the Proposed Project arena operator.

Key conclusions regarding the transportation impacts of major events can be found in Tables 3.14-31 through 3.14-34 for the Adjusted Baseline scenarios, and Tables 3.14-52 through 3.14-55 for the Cumulative scenarios.

### **Concurrent Events**

One of the unique aspects of the Proposed Project is the proximity of the Project Site to other major sports and entertainment venues: the NFL Stadium being constructed in the HPSP area, and The Forum located near the intersection of South Prairie Avenue and Manchester Boulevard. In other cities, where NBA arenas are located in close proximity to NFL stadiums, the NBA and NFL avoid scheduling basketball games on the same day as NFL games. However, it cannot be assumed that such coordination would take place between concert promoters and at other times circumstances could result in overlapping or concurrent events. While the overlap of NBA and NFL games would occur extremely rarely, if ever, in order to account for the possibility of such conditions, the Draft EIR analyzes the Proposed Project assuming that one or more events at the nearby NFL Stadium and/or the Forum would occur on the same day as a major event at the proposed Arena.

The analysis addresses five concurrent or overlapping event scenarios, including a major event at the Proposed Project and (1) a sold out concert at The Forum on a weekday or weekend evening; (2) a sold out NFL football game at the NFL Stadium on a weekend day; (3) a 25,000 attendee event at the NFL Stadium on a weekday evening; (4) a sold out concert at The Forum and a 25,000 attendee event at the NFL Stadium on a weekday evening; and (5) a sold out concert at The Forum and a sold out NFL football game at the NFL Stadium on a weekend day.

The results of analyses of each of these concurrent and overlapping event scenarios are presented in the Transportation section. Key findings from the study of the Proposed Project effects when combined with other major events at the NFL Stadium and/or The Forum include:

With respect to intersections:

- Proposed Project significant intersection impacts would be more frequent during the weekday pre-event peak hour than during the other two study periods regardless of other types of events or conditions.
- The number of intersections significantly impacted by the Proposed Project would increase substantially (from 40 to 60 during the weekday pre-event peak hour, from 11 to 45 during the weekday post-event peak hour, and from 26 to 41 during the weekend pre-event peak hour) when the background condition includes an event at The Forum.
- The number of intersections significantly impacted by the Proposed Project during the weekday pre-event and post-event peak hours would be less when the background condition consists of a mid-sized weekday event at the NFL Stadium versus an event at The Forum.

47 to 67 [see text after Table 78]

This is because the mid-sized event at the NFL Stadium would utilize all of the surrounding parking in the HPSP area. The result would be that a greater number of project attendees would be required to park remotely and be shuttled to the Proposed Project, thereby adding fewer trips in the immediate vicinity of the Project Site and the NFL Stadium and causing fewer impacts.

- The overall operation of the street system in the study area would be substantially worse under each concurrent event scenario than for the Proposed Project alone.

With respect to freeway facilities:

- Generally, the Proposed Project would generate more extensive significant impacts on freeway segments during the weekday pre-event peak hour than during either the weekday post-event or weekend pre-event peak hour, regardless of which background condition is being studied (the exception being the weekday post-event hour with concurrent events at both The Forum and the NFL Stadium).

With respect to freeway off-ramp queuing:

- Off-ramp queues longer than the applicable standard are expected at three off-ramps during the weekday pre-event hour and at two off-ramps during the weekend pre-event hour with the Proposed Project but without events at the other two venues. The estimated queues would be longer with each added concurrent event. Off-ramp queues would be projected to exceed the applicable standard at up to two additional off-ramps depending on the concurrent event.

Key conclusions regarding the transportation impacts related to concurrent events can be found in Tables 3.14-31 through 3.14-34 for the Adjusted Baseline scenarios, and Tables 3.14-64 through 3.14-69 for the Cumulative scenarios.

### **Vehicle Miles Traveled**

VMT is a measure of the total miles traveled by all of the trips associated with a particular project, measured as travel distance from the origin of the trip to the Proposed Project, and back again. It can be measured in total miles or in miles per capita (resident, employee, attendee, etc.). In recent years, VMT has been recognized as an important metric to understand the environmental consequences of driving, because often a longer trip has greater environmental impact than a shorter trip.

VMT impacts of the office, practice facility, and sports medicine clinic components of the Proposed Project would be considered less than significant because the daily work VMT per employee is estimated at 15.0, less than the 15.8 threshold (15 percent less than the regional daily work VMT value of 18.6). Since the regional patronage associated with events is considered as part of the event VMT impacts, the VMT from restaurant uses are considered to be less than significant. However, VMT from the proposed hotel would be considered significant as it would generate a net increase in daily VMT.

For NBA games at the Proposed Project there would be a net increase of 4.4 to 4.9 VMT per attendee compared to the per attendee VMT for games at Staples Center, and for major concerts at the Proposed Project there would be a net increase of VMT of 4.8 to 5.3 miles per attendee

compared to a similar concert elsewhere in the region. For sold out events, this would result in an increase of approximately 80,000 to 90,000 VMT per NBA game, and 90,000 to 100,000 VMT per major concert. These impacts are considered significant.

Key conclusions regarding the VMT impacts of the Proposed Project can be found in Tables 3.14-40 through 3.14-43.

## Mitigation Measures

The evaluation in the Draft EIR identifies a broad number of significant impacts at intersections, on neighborhood streets, on freeways, and on freeway off-ramps. It also identifies a limited number of significant impacts on transit systems, and pedestrian sidewalk and crosswalk facilities. Further, it identifies impacts related to increases in total and per attendee VMT. As required under CEQA, where significant impacts are identified, the EIR must describe potentially feasible mitigation measures that can substantially lessen or avoid those impacts.

The Draft EIR describes a variety of feasible mitigation measures, each of which falls into one of the following four categories:

- **Physical Improvements** – The majority of the study area is developed, which limits the locations, magnitude, and type of physical improvements that could be constructed on surface streets. However, in some instances, minor improvements are possible through restriping, converting medians to turn lanes, and widening (particularly on freeway off-ramps). Where such improvements are being proposed, the mitigation measure discusses the extent to which additional right-of-way may be necessary and the agency responsible for approving the physical improvement.
- **Signal Timing Improvements** – Some, but not all, of the signalized intersections along study corridors currently feature coordinated operations that enable large platoons of vehicles to progress from one intersection to the next with minimal stopping. Further, few, if any, signals operate with special event signal timings, which provide increased green time to high-volume movements. The preferred means for accomplishing signal timing improvements is through the Citywide Intelligent Transportation Systems (ITS) program versus an isolated, intersection by intersection approach. ITS would provide a fully responsive traffic signal system based on real time traffic conditions that can provide instantaneous traffic information and predictive time information to users along access corridors. Additionally, this would enable the City to better accommodate event-related traffic.
- **TDM Strategies** – In order to reduce single-occupant vehicle trips and encourage other modes of travel, which has the effect of mitigating congestion, as well as other environmental impacts of vehicular travel such as criteria air pollutant and GHG emissions, transportation energy use, traffic noise, and the like, the Draft EIR includes the requirement for the project applicant to implement the ~~IBEC Project Transportation Demand Management Program included in the project AB 987 application (see Mitigation Measure 3.14-2(b)).~~

a comprehensive TDM program.

The event-related environmental characteristics of the Forum Alternative are similar to the conditions that exist today during events at The Forum. However, the estimated number of events (approximately 243 per year) would be increased compared to recent activity levels at The Forum (approximately 115 per year). Non-event day impacts would be similar to those described for the Proposed Project, and would be greater than exist today because the existing Forum building and site do not include any of the ancillary uses that would be included in this alternative. Impacts related to views and shadows, biological and cultural resources, hazardous materials and airport hazards, noise and vibration, and public services would be similar to those of the Proposed Project.

Construction air emissions would be somewhat increased under this alternative due to the increased demolition associated with the removal of the existing Forum building. Because this alternative would not include a hotel, the operational air pollutant and GHG emissions, water demand, wastewater generation, and energy demand would be reduced under the Forum Alternative. It is expected that lighting impacts of Alternative 7 would be less than those described for the Proposed Project, but with mitigation the effects would be similar.

Because the Forum Alternative arena and ancillary uses would be of similar size and in a similar setting as the Proposed Project, the trip generation and related impacts on intersections, local roadways, and freeways, as well as impacts related to emergency access to Centinela Hospital would be similar to those described for the Proposed Project. Since the on-site parking development in Alternative 7 is similar to the Proposed Project, a similar number of employees and event attendees would park off site, resulting in similar impacts related to pedestrian flows to and from the Alternative 7 site. Mitigation measures that would be the same or similar as the Proposed Project would be required to lessen the significant traffic impacts of the Forum, with a similar number of significant and unavoidable impacts.

Impacts related to effects on neighborhood streets south and east of the Project Site would be diminished with Alternative 7 due to the lack of connectivity in the local roadway network near the Forum site. In addition, because Alternative 7 would not include a hotel, it would not have a significant impact as a result of hotel-related VMT. Because this alternative involves the demolition of the historic Forum building, it would eliminate the potential for some concurrent event scenarios, including concurrent events at The Forum and the Proposed Project, as well as concurrent events at The Forum, the NFL Stadium, and the Proposed Project.

The Forum Alternative would result in a significant impact on historic resources <sup>and aesthetics</sup> as a result of the demolition of the National Register and California Register listed Forum building, an impact that would not occur with the Proposed Project. As explained above, the demolition of the historic Forum building would be a necessary element of this alternative because (1) there is no feasible method of adaptively reusing the historic structure to accommodate the construction of a modern NBA arena, and (2) there is insufficient land on the Forum Alternative site for the development of such an arena without demolition of the existing Forum building. Required mitigation measures would include documentation under the Historic American Building Survey (HABS), development and implementation of a salvage plan, and development of displays that tell the

**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.4 Cultural and Tribal Cultural Resources (cont.)</b>			
<b>3.4-5:</b> Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to result in cumulatively considerable impacts to historical resources.	PS	<b>Mitigation Measure 3.4-5</b> Implement Mitigation Measure 3.4-1.	LS
<b>3.4-6:</b> Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on archaeological resources.	PS	<b>Mitigation Measure 3.4-6</b> Implement Mitigation Measure 3.4-1.	LS
<b>3.4-7:</b> Construction of the Proposed Project, in conjunction with construction of other cumulative development, could have the potential to contribute to cumulative impacts on the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074.	PS	<b>Mitigation Measure 3.4-7</b> Implement Mitigation Measure 3.4-1.	LS
<b>3.4-8:</b> Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on human remains including those interred outside of dedicated cemeteries.	PS	<b>Mitigation Measure 3.4-8</b> Implement Mitigation Measure 3.4-4.	LS
<b>3.5 Energy Demand and Conservation</b>			
<b>3.5-1:</b> Construction and operation of the Proposed Project could cause wasteful, inefficient, or unnecessary consumption of energy resources.	LS	None required.	NA
<b>3.5-2:</b> Construction and operation of the Proposed Project could conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	LS	None required.	NA

MISSING 3.5-3: (Relocation/Construction of new facilities)  
(See Energy ch. p 3.5-36)

NOTES:  
LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable



**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.5 Energy Demand and Conservation (cont.)</b>			
<p><b>3.5-3:</b> Construction and operation of the Proposed Project, in conjunction with other cumulative development, could cause wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation of the Proposed Project.</p>	LS	None required.	NA
<p><b>3.5-4:</b> Construction and operation of the Proposed Project, in conjunction with other cumulative development, could conflict with or obstruct a State or local plan for renewable energy or energy efficiency.</p>	LS	None required.	NA
<b>3.6 Geology and Soils</b>			
<p><b>3.6-1:</b> Construction and operation of the Proposed Project could have the potential to result in the substantial erosion or the loss of topsoil.</p>	PS	<p><b>Mitigation Measure 3.6-1</b> Implement Mitigation Measure 3.9-1(a). Comply with Applicable Regulations as Approved by the City and the Los Angeles RWQCB.</p>	LS
<p><b>3.6-2:</b> Construction of the Proposed Project could have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p>	PS	<p><b>Mitigation Measure 3.6-2</b> A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) shall be retained by the project applicant and approved by the City prior to the approval of grading permits. The qualified paleontologist shall:</p> <ul style="list-style-type: none"> <li>a) Prepare, design, and implement a monitoring and mitigation program for the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project Site, data recovery (including halting or diverting construction so that fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines that the Project-related grading and excavation activity will not affect Older Quaternary Alluvium, then no further mitigation is required.</li> <li>b) Conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Plan as outlined in (a). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall provide instruction on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the qualified paleontologist demonstrating that the appropriate construction personnel attended the training.</li> </ul>	LS

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**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.7 Greenhouse Gas Emissions (cont.)</b>			
3.7-1 (cont.)		<p>The purpose of the Plan is to document the Project's GHG emissions, including emissions after Project-specific GHG reduction measures are implemented, and to determine the net incremental emission reductions required to meet the "no net new" GHG emissions threshold over the 30-year life of the Project. The Plan shall include a detailed description of the GHG emissions footprint for all operational components of the Project based on the best available operational and energy use data at time of approval and the latest and most up to date emissions modeling and estimation protocols and methods.</p> <p>The GHG Reduction Plan shall include the following elements:</p> <ol style="list-style-type: none"> <li>1) Project GHG Emissions. Estimate the Project's net new GHG emissions over the 30-year operational life of the Project. The estimate shall be based on final design, project-specific traffic generation, actual energy use estimates, equipment to be used on site, and other emission factors appropriate for the Project, using the best available emissions factors for electricity, transportation engines, and other GHG emission sources commonly used at the time the GHG Reduction Plan is completed, reflecting existing vehicle emission standards and building energy standards. Net operational (incremental) emissions shall be derived by adding the annual operational emissions and backfill emissions and then subtracting from that total existing emissions and emissions from relocated LA Clippers games and market shifted non-NBA events, as illustrated in Table 3.7-9. The estimate shall include the Project's construction GHG emissions, which shall be amortized over the 30-year operational life of the Project, shown in Table 3.7-7 to be 603 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e)/year.</li> <li>2) GHG Mitigation. Include reduction measures that are sufficient to reduce or offset incremental emissions over the net neutral threshold, are verifiable, and are feasible to implement over project life. At a minimum, the GHG Reduction Plan shall include: (i) implementation of all measures identified in the Project's application under AB 987 as necessary to meet the local, direct GHG emissions requirements under Public Resources Code section 21168.6.8(j)(3), as set forth under Section A. below; and (ii) emissions reductions associated with implementation of Project Design Features 3.2-1 and 3.2-2 and Mitigation Measures 3.2-2(b) and 3.14-2(b) regarding the reduction of NOx and PM2.5 emissions, to the extent these features and measures have co-benefits in the form of quantifiable GHG emissions reductions. The project applicant shall be required to implement a combination of measures identified in Section B below to achieve any remaining GHG emission reductions beyond those identified in (i) and (ii) above necessary to meet the no net new GHG emissions threshold over the 30-year operational life of the Project.             <ol style="list-style-type: none"> <li>A. Required GHG Reduction Measures.                 <ol style="list-style-type: none"> <li>a. Minimize the IBEC Project's energy demand through physical design features. Minimize electricity and natural gas demand through implementation of LEED Gold certification design features.</li> <li>b. Implement a transportation demand management (TDM) program that includes the following, subject to further refinement and revision through coordination between the City and the project applicant at the time of project approval:                     <ol style="list-style-type: none"> <li>i. TDM 1 – Encourage Alternative Modes of Transportation (Rail, Public Bus, and Vanpool). The IBEC Project shall encourage alternative modes of transportation use by providing monetary incentives and bus stop improvements near the Project Site such as, but not limited to:</li> </ol> </li> </ol> </li> </ol> </li> </ol>	

*Include edits corresponding to sponsor GHG edits, if accepted.*

**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.13 Public Services (cont.)</b>			
<b>3.13-11:</b> Construction and operation of the Proposed Project could result in substantial adverse physical impacts associated with the need for or provision of new or physically altered schools, the construction of which could cause significant environmental impacts.	LS	None required.	NA
<b>3.13-12:</b> Construction and operation of the Proposed Project, in conjunction with other cumulative development, could contribute to cumulative substantial adverse physical impacts associated with the need for or provision of new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.	LS	None required.	NA
<b>3.14 Transportation and Circulation</b>			
<b>3.14-1:</b> Operation of the Proposed Project ancillary land uses would cause significant impacts at intersections under Adjusted Baseline conditions.	S	<b>Mitigation Measure 3.14-1(a)</b> The project applicant shall implement elements of the Transportation Demand Management (TDM) Program described in Mitigation Measure 3.14-2(b) including strategies, incentives and tools to provide opportunities for daytime and non-event employees to reduce single-occupancy vehicle trips and use other modes besides automobile to travel to and from the Project Site. These elements include:	SU
<p>a) TDM 1/Encourage Alternative Modes of Transportation (Rail, Public Bus, and Vanpool) – The Project shall encourage alternative modes of transportation use by providing monetary incentives and bus stop improvements near the Project Site such as:</p> <ul style="list-style-type: none"> <li>• Bus stop facilities improvements: The Project would provide on-site and/or off-site improvements such as lighting, new benches and overhead canopies, added bench capacity if needed, and real-time arrival information for an improved user experience for bus stops that are relocated as a result of the Project.</li> <li>• Transit and/or Multi-Modal Subsidy: The Project would provide pre-tax commuter benefits for employees.</li> <li>• Vanpool Subsidy: This would provide pre-tax commuter benefits for employees.</li> <li>• Marketing and outreach campaign for transit usage.</li> </ul> <p>b) TDM 3/Encourage Carpools and Zero-Emission Vehicles – The Project shall provide several incentives that would encourage carpooling and zero-emission vehicles as a means for sharing access to and from the Project Site including the following:</p> <ul style="list-style-type: none"> <li>• Provide incentives for carpools or zero-emission vehicles, including preferential parking with the number of parking spots in excess of applicable requirements, reduced parking costs, or other discounts/benefits.</li> </ul>			

S

This and all other "S" notes in Transpo should be "PS" for consistency.

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**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.14 Transportation and Circulation (cont.)</b>			
3.14-2 (cont.)		<p><b>Mitigation Measure 3.14-2(j)</b> The project applicant shall work with the City of Inglewood, the City of Hawthorne, and Caltrans to widen the I-105 westbound off-ramp at Crenshaw Boulevard to consist of one left, one left/through, and two right-turn lanes. This would require complying with the Caltrans project development process as a local agency-sponsored project. Depending on the complexity and cost of the improvement, this could include (but is not limited to) a cooperative agreement, permit engineering evaluation report, project study report, project report, environmental and engineering studies, project design, construction, etc.</p>	
		<p><b>Mitigation Measure 3.14-2(k)</b> The project applicant shall work with the City of Hawthorne to remove the median island and restripe the southbound approach of South Prairie Avenue at 120th Street to provide a second left-turn lane, resulting in two left-turn lanes, two through lanes and one shared through/right-turn lane.</p>	
		<p><b>Mitigation Measure 3.14-2(l)</b> The project applicant shall work with the City of Hawthorne to implement a southbound right-turn overlap signal phase at the intersection of Crenshaw Boulevard and 120th Street.</p>	
		<p><b>Mitigation Measure 3.14-2(m)</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).</p>	
		<p><b>Mitigation Measure 3.14-2(n)</b> The project applicant shall construct a second left-turn lane on southbound La Brea Avenue at Centinela Avenue and implement protected left turns for the northbound and southbound approaches.</p>	
		<p><b>Mitigation Measure 3.14-2(o)</b> The project applicant shall make a funding contribution to the City of Inglewood Public Works Traffic Division to help fund and implement Intelligent Transportation Systems (ITS) improvements at intersections in which the Project causes a significant impact for which a specific mitigation that would reduce this impact to less than significant could not be identified.</p>	
<p><b>3.14-3:</b> Major events at the Proposed Project Arena would cause significant impacts at intersections under Adjusted Baseline conditions.</p>	S	<p><b>Mitigation Measure 3.14-3(a)</b> Implement Mitigation Measure <b>3.14-2(a)</b> (Implement Event TMP). <i>bolding</i></p> <p><b>Mitigation Measure 3.14-3(b)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).</p> <p><b>Mitigation Measure 3.14-3(c)</b> The project applicant shall work with the City of Inglewood and Caltrans to restripe the center lane on the I-405 NB Off-Ramp at West Century Boulevard to permit both left and right-turn movements. This would require complying with the Caltrans project development process as a local agency-sponsored project. This could include (but is not limited to) a cooperative agreement, permit engineering evaluation report, encroachment permit, project design, construction, etc.</p>	SU

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**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.14 Transportation and Circulation (cont.)</b>			
3.14-3 (cont.)		<p><b>Mitigation Measure 3.14-3(d)</b> Implement Mitigation Measure 3.14-2(d) (West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard Improvements).</p> <p><b>Mitigation Measure 3.14-3(e)</b> The project applicant shall convert the signal control system at the intersection of South Prairie Avenue and Pincay Drive to provide protected or protected-permissive westbound and eastbound left-turn phasing.</p> <p><b>Mitigation Measure 3.14-3(f)</b> The project applicant shall widen the east side of South Prairie Avenue to extend the proposed shuttle bus pull-out on the east side of South Prairie Avenue to the intersection to serve as an exclusive right-turn lane. Additionally, implement a northbound right-turn signal overlap phase. During pre-event and post-event periods, TCOs shall be positioned at this location as part of the Event TMP to manage the interaction of northbound right-turning traffic and pedestrians in the east leg crosswalk and to permit the lane to also operate as a bus queue jumper for shuttle buses departing the shuttle bus pull-out and traveling north through the intersection.</p> <p><b>Mitigation Measure 3.14-3(g)</b> Implement Mitigation Measure 3.14-2(g) (I-105 Off-Ramp Widening at South Prairie Avenue).</p> <p><b>Mitigation Measure 3.14-3(h)</b> Implement Mitigation Measure 3.14-2(j) (I-105 Westbound Off-Ramp Widening at Crenshaw Boulevard).</p> <p><b>Mitigation Measure 3.14-3(i)</b> Implement Mitigation Measure 3.14-2(l) (Crenshaw Boulevard/120th Street Improvements).</p> <p><b>Mitigation Measure 3.14-3(j)</b> The project applicant shall work with the City of Inglewood and the City of Los Angeles to remove the median island on the north leg and construct a second left-turn lane on southbound La Cienega Boulevard at Centinela Avenue.</p> <p><b>Mitigation Measure 3.14-3(k)</b> Implement Mitigation Measure 3.14-2(n) (La Brea Avenue/Centinela Avenue Improvements).</p> <p><b>Mitigation Measure 3.14-3(l)</b> The project applicant shall implement protected or protected/permissive left-turn phasing on northbound and southbound South Prairie Avenue at West 104th Street.</p> <p><b>Mitigation Measure 3.14-3(m)</b> Implement Mitigation Measure 3.14-2(e) (Restripe the westbound West 104th Street approach to Yukon Avenue to consist of a left/through lane and a dedicated right-turn lane).</p> <p><b>Mitigation Measure 3.14-3(n)</b> Implement Mitigation Measure 3.14-2(j) (Manchester Boulevard/Crenshaw Boulevard Improvements).</p>	

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Should be  
"i"*

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**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.14 Transportation and Circulation (cont.)</b>			
<b>3.14-17:</b> Daytime events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions.	S	<p><b>Mitigation Measure 3.14-17a</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP).</p> <p><b>Mitigation Measure 3.14-17(b)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).</p> <p><b>Mitigation Measure 3.14-17(c)</b> Implement Mitigation Measure 3.14-2(c) (West Century Boulevard/La Cienega Boulevard Improvements).</p> <p><b>Mitigation Measure 3.14-17(d)</b> Implement Mitigation Measure 3.14-2(d) (West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard Improvements).</p> <p><b>Mitigation Measure 3.14-17(e)</b> Implement Mitigation Measure 3.14-3(f) (South Prairie Avenue/West Century Boulevard Improvements).</p> <p><b>Mitigation Measure 3.14-17(f)</b> Implement Mitigation Measure 3.14-2(f) (West 104th Street/Yukon Avenue Improvements).</p> <p><b>Mitigation Measure 3.14-17(g)</b> Implement Mitigation Measure 3.14-2(g) (I-105 Off-ramp Widening at South Prairie Avenue).</p> <p><b>Mitigation Measure 3.14-17(h)</b> Implement Mitigation Measure 3.14-2(h) (Manchester Boulevard/La Brea Avenue Improvements).</p> <p><b>Mitigation Measure 3.14-17(i)</b> Implement Mitigation Measure 3.14-2(i) (Manchester Boulevard/Crenshaw Boulevard Avenue Improvements).</p> <p><b>Mitigation Measure 3.14-17(j)</b> Implement Mitigation Measure 3.14-2(j) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard).</p> <p><b>Mitigation Measure 3.14-17(k)</b> Implement Mitigation Measure 3.14-2(k) (South Prairie Avenue/120th Street Improvements).</p> <p><b>Mitigation Measure 3.14-17(l)</b> Implement Mitigation Measure 3.14-2(l) (Crenshaw Boulevard/120th Street Improvements).</p> <p><b>Mitigation Measure 3.14-17(m)</b> Implement Mitigation Measure 3.14-2(m) (Provide TCOs on Crenshaw Boulevard at 120th Street during post-event period as part of Event TMP).</p> <p><b>Mitigation Measure 3.14-17(n)</b> Implement Mitigation Measure 3.14-2(n) (La Brea Avenue/Centinel Avenue Improvements).</p>	SU

*holding*

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**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.14 Transportation and Circulation (cont.)</b>			
3.14-17 (cont.)		<p><b>Mitigation Measure 3.14-17(o)</b> Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS Program).</p> <p><b>Mitigation Measure 3.14-17(p)</b> Implement Mitigation Measure 3.14-3(c) (I-405 NB Off-Ramp Restripe at West Century Boulevard).</p> <p><b>Mitigation Measure 3.14-17(q)</b> The project applicant shall restripe the northbound approach of Felton Avenue at West Century Boulevard from a single left-through-right lane to one left/through lane and one right-turn lane.</p>	
<p><b>3.14-18:</b> Major events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions.</p>	S	<p><b>Mitigation Measure 3.14-18a</b> Implement Mitigation Measure <b>3.14-2(a)</b> (Implement Event TMP). <i>bolding</i></p> <p><b>Mitigation Measure 3.14-18(b)</b> Implement Mitigation Measure 3.14-2(b) (Implement TDM Program).</p> <p><b>Mitigation Measure 3.14-18(c)</b> Implement Mitigation Measure 3.14-3(c) (I-405 NB Off-Ramp Restripe at West Century Boulevard).</p> <p><b>Mitigation Measure 3.14-18(d)</b> Implement Mitigation Measure 3.14-2(d) (West Century Boulevard/Hawthorne Boulevard/La Brea Boulevard Improvements).</p> <p><b>Mitigation Measure 3.14-18(e)</b> Implement Mitigation Measure 3.14-3(e) (Protected or protected/permissive eastbound/westbound left turns at South Prairie Avenue/Pincay Drive).</p> <p><b>Mitigation Measure 3.14-18(f)</b> Implement Mitigation Measure 3.14-3(f) (Northbound Exclusive Right-turn Lane and TCO support at South Prairie Avenue/West Century Boulevard).</p> <p><b>Mitigation Measure 3.14-18(g)</b> Implement Mitigation Measure 3.14-2(g) (I-105 Off-Ramp Widening at South Prairie Avenue).</p> <p><b>Mitigation Measure 3.14-18(h)</b> Implement Mitigation Measure 3.14-2(j) (I-105 Off-ramp Widening at Crenshaw Boulevard).</p> <p><b>Mitigation Measure 3.14-18(i)</b> Implement Mitigation Measure 3.14-2(l) (Crenshaw Boulevard/120th Street Improvements).</p> <p><b>Mitigation Measure 3.14-18(j)</b> Implement Mitigation Measure 3.14-3(j) (La Cienega Boulevard/Centinela Avenue Improvements).</p> <p><b>Mitigation Measure 3.14-18(k)</b> Implement Mitigation Measure 3.14-2(n) (La Brea Avenue/Centinela Avenue Improvements).</p>	SU

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**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.14 Transportation and Circulation (cont.)</b>			
3.14-18 (cont.)		<p><b>Mitigation Measure 3.14-18(l)</b> Implement Mitigation Measure 3.14-3(l) (South Prairie Avenue/West 104th Street Improvements).</p> <p><b>Mitigation Measure 3.14-18(m)</b> Implement Mitigation Measure 3.14-2(e) (West 104th Street/Yukon Avenue Improvements).</p> <p><b>Mitigation Measure 3.14-18(n)</b> Implement Mitigation Measure 3.14-2(i) (Manchester Boulevard/Crenshaw Boulevard Improvements).</p> <p><b>Mitigation Measure 3.14-18(o)</b> Implement Mitigation Measure 3.14-3(o) (Coordinate and Optimize Traffic Signals).</p> <p><b>Mitigation Measure 3.14-18(p)</b> Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS program).</p> <p><b>Mitigation Measure 3.14-18(q)</b> Implement Mitigation Measure 3.14-17(q) (Felton Avenue/West Century Boulevard Improvements).</p> <p><b>Mitigation Measure 3.14-18(r)</b> Implement Mitigation Measure 3.14-2(h) (Manchester Boulevard La Brea Avenue Improvements).</p>	
<p><b>3.14-19:</b> Operation of the Proposed Project ancillary land uses would cause significant impacts on neighborhood streets under cumulative conditions.</p>	S	<p><b>Mitigation Measure 3.14-19(a)</b> Implement Neighborhood Traffic Management Plan component of Event TMP, which is contained in Mitigation Measure <b>3.14-2(a)</b>.</p> <p>The Event TMP, which can be found in Appendix K.4, includes a chapter on neighborhood traffic protection including the need for the project applicant to develop and implement a NTMP. The NTMP would cover the area bounded by Hawthorne Boulevard, Hardy Boulevard, Crenshaw Boulevard, and Imperial Highway (excluding the Hollywood Park Specific Plan area). It outlines the process by which the applicant and City would engage neighborhood groups, businesses, and stakeholders to develop a plan that has broad consensus and protects the neighborhood from unwanted traffic intrusion during events at the Project. It was not possible for the Draft EIR to identify a solution with broad consensus among stakeholders that would fully address and mitigate the traffic levels expected on the impacted streets. Such an effort would require extensive public outreach, as well as detailed study of how various measures could be implemented to reduce volumes on street segments identified as having significant street impacts without causing additional impacts on nearby streets. The NTMP lays out the process to be undertaken to complete this assessment.</p>	SU
<p><b>3.14-20:</b> Daytime events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions.</p>	S	<p><b>Mitigation Measure 3.14-20</b> Implement Mitigation Measure <b>3.14-2(a)</b> (Implement Event TMP).</p>	SU

*why is this here?  
Not part of the MM, right?*

*bolding*



**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

<b>Impact</b>	<b>Significance Before Mitigation</b>	<b>Mitigation Measure</b>	<b>Significance After Mitigation</b>
<b>3.14 Transportation and Circulation (cont.)</b>			
<b>3.14-21:</b> Major events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions.	S	<b>Mitigation Measure 3.14-21</b> Implement Mitigation Measure <b>3.14-2(a)</b> (Implement Event TMP).	SU
<b>3.14-22:</b> Operation of the Proposed Project ancillary land uses could have the potential to cause significant impacts on freeway facilities under cumulative conditions.	LS	None required.	NA
<b>3.14-23:</b> Daytime events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions.	S	<b>Mitigation Measure 3.14-23(a)</b> Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b). <b>Mitigation Measure 3.14-23(b)</b> Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).	SU
<b>3.14-24:</b> Major events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions.	S	<b>Mitigation Measure 3.14-24(a)</b> Implement mitigation measure 3.14-3(h) (I-105 Westbound Off-ramp Widening at Crenshaw Boulevard). <b>Mitigation Measure 3.14-24(b)</b> Implement Mitigation Measure 3.14-3(c) (Restripe I-405 NB Off-Ramp at West Century Boulevard). <b>Mitigation Measure 3.14-24(c)</b> Implement Mitigation Measure 3.14-3(o) (Retime and optimize traffic signals on Inglewood streets). <b>Mitigation Measure 3.14-24(d)</b> Implement Mitigation Measure 3.14-3(g) (I-105 Off-ramp Widening at South Prairie Avenue). <b>Mitigation Measure 3.14-24(e)</b> Implement Mitigation Measure 3.14-2(a) (Implement Event TMP). <b>Mitigation Measure 3.14-24(f)</b> Implement the trip reduction measures included in the Project TDM Program described in Mitigation Measure 3.14-2(b). <b>Mitigation Measure 3.14-24(g)</b> Implement Mitigation Measure 3.14-8(b) (Work with Caltrans to implement traffic management system improvements along the I-105 corridor).	SU

*Handwritten notes:*  
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 The word "holding" written vertically in the second row.

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**TABLE S-2  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

*shall*

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<b>3.14 Transportation and Circulation (cont.)</b>			
<b>3.14-25:</b> The Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions.	S	<p><b>Mitigation Measure 3.14-25(a)</b> The project applicant shall implement Mitigation Measures 3.14-2(a) (Event Transportation Management Plan), 3.14-2(b) (TDM Program), and the entirety of the intersection improvements in Mitigation Measures 3.14-2 and 3.14-3.</p> <p><b>Mitigation Measure 3.14-25(b)</b> The project applicant shall implement Mitigation Measures 3.14-11(b) to lengthen the proposed shuttle pull-out.</p>	SU
<b>3.14-26:</b> The Proposed Project could have the potential to result in inadequate emergency access under cumulative conditions	PS	<p><b>Mitigation Measure 3.14-26</b> Implement Mitigation Measure 3.14-14 (Local Hospital Access Plan).</p>	LS
<b>3.14-27:</b> The Proposed Project would substantially affect circulation for a substantial duration of construction under cumulative conditions.	S	<p><b>Mitigation Measure 3.14-27</b> The project applicant shall implement Mitigation Measure 3.14-15, Construction Traffic Management Plan.</p>	SU
<b>3.14-28:</b> Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts at intersections under Adjusted Baseline conditions.	S	<p><b>Mitigation Measure 3.14-28(a)</b> Implement Mitigation Measures 3.14-3(a) through 3.14-3(o).</p> <p><b>Mitigation Measure 3.14-28(b)</b> The project applicant shall make a funding contribution to the City of Inglewood Public Works Traffic Division to help fund and implement Intelligent Transportation Systems (ITS) improvements at intersections in which the Project causes a significant impact for which a specific mitigation that would reduce this impact to less than significant could not be identified.</p> <p><b>Mitigation Measure 3.14-28(c)</b> On days with concurrent events at The Forum, the City shall coordinate the Event TMP with the operator of The Forum to expand traffic control officer coverage and implement temporary lane assignments through the use of cones as follows:</p> <ul style="list-style-type: none"> <li>• At South Prairie Avenue and Arbor Vitae Street under pre-event conditions, through the use of cones and signs temporarily suspend curb parking to allow approximately 150' eastbound right turn pocket; lane widths may be reduced to approximately 11' to accommodate the turn pocket. This modification reduces a bottleneck during the pre-event peak hour that affects upstream traffic.</li> <li>• At Hawthorne Boulevard and West Century Boulevard, through the placement of a TCO and cones, temporarily reassign the northbound approach as 2 left turn lanes, 2 through lanes, and 2 right turn lanes, allowing a northbound right turn phase overlap with the westbound left turns.</li> </ul> <p><b>Mitigation Measure 3.14-28(d)</b> On days with concurrent events at the NFL Stadium, the City shall coordinate the Event TMP with the operator of the NFL Stadium Transportation Management and Operations Plan (TMOP).</p>	SU

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