

CHAPTER 1

Introduction

Murphy’s Bowl LLC (the project applicant) proposes entitlement, construction and operation of the proposed Inglewood Basketball and Entertainment Center (IBEC), which would include an approximately 915,000-square-foot (sf), 18,000-fixed-seat arena (Arena Structure or Arena) suitable for National Basketball Association (NBA) games, with up to 500 additional temporary seats for other sports or entertainment events; an approximately 85,000-sf team practice and athletic training facility; approximately 71,000 sf of Los Angeles (LA) Clippers team office space; an approximately 25,000 sf sports medicine clinic for team and potential general public use; approximately 48,000 sf of commercial uses; a hotel with up to 150 guest rooms; up to 15,000 sf of community uses; an outdoor plaza with landscaped areas, and community gathering space; removal and relocation of an existing City of Inglewood (City)-owned water well; and surface- and structured-parking facilities to serve the proposed development. These activities are referred to collectively as the Proposed Project. For a detailed description and exhibits of the Proposed Project, please see Chapter 2, Project Description.

This Environmental Impact Report (EIR) has been prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code (PRC) section 21000 et seq.) and CEQA Guidelines (Title 14, section 15000 et seq. of the California Code of Regulations) (CEQA Guidelines) in order to disclose the potential environmental consequences of implementing the Proposed Project (State Clearinghouse Number 2018021056). As required under CEQA, the EIR evaluates and describes potentially significant environmental impacts, identifies potentially feasible mitigation measures to avoid or reduce the significance of potential impacts, and evaluates the comparative effects of potentially feasible alternatives to the Proposed Project.

1.1 Background

The Project Site is located in the southwestern portion of the City of Inglewood within Los Angeles County, approximately 10 miles south/southwest of downtown Los Angeles. The main portion of the Project Site, referred to as the Arena Site, is bounded by West Century Boulevard on the north, South Prairie Avenue on the west, South Doty Avenue on the east, and a straight line extending east from West 103rd Street to South Doty Avenue to the south. The Arena Site is approximately 16.71 acres. Chapter 2, Project Description, presents exhibits of the Project Site, the surrounding area, and surrounding land uses.

The Project Site encompasses four, specific locations where different features of the Proposed Project would be located:

- *Arena Site:* The central part of the Project Site. The features located on the Arena Site include the Arena, privately owned outdoor plaza, community space, practice facility, sports medicine clinic, team offices, retail/restaurants, a parking structure, and related development;
- *West Parking Garage Site:* The part of the Project Site west of the Arena Site. The features located on the West Parking Garage Site include a multi-level parking structure to serve patrons of the Arena Site;
- *East Transportation and Hotel Site:* The portion of the Project Site east of the Arena Site, across South Doty Avenue. The East Transportation and Hotel Site includes a three story parking garage located on a portion of the site fronting West Century Boulevard, along with a paved surface lot area on a portion of the site fronting West 102nd Street. The ground floor of the parking garage and the surface lot area will serve as a transportation hub. The transportation hub includes a staging and parking area for coach buses and microtransit vehicles, a passenger loading area, and a staging/queuing area for transportation network company (TNC) vehicles such as Uber and Lyft vehicles, and taxis serving the Arena Site.¹ The second and third floors of the garage would provide parking for patrons of the Arena Site. The east side of the East Transportation and Hotel Site would include a limited service hotel and associated parking facilities; and
- *Well Relocation Site:* The portion of the Project Site immediately east of the Arena Site. The Well Location Site would contain a City-owned and -operated potable water well.

A portion of West 101st Street, west of South Prairie Avenue, would be vacated and replaced by the first floor of the parking garage. A portion of West 102nd Street between South Prairie Avenue and South Doty Avenue would be vacated and developed with the Arena Structure and related development.

All but six of the parcels that make up the Project Site are currently vacant or undeveloped. The six developed parcels, approximately 2.9 acres all within the Arena Site, include a fast food restaurant (on a privately-owned parcel), a motel (on a privately-owned parcel), a warehouse and light manufacturing facility (on two privately-owned parcels), a commercial catering business (on a privately-owned parcel), and a groundwater well and related facilities (on a City-owned parcel).

The Project Site is located approximately 2 miles east of Los Angeles International Airport (LAX) and approximately 1.5 miles north of Jack Northrop Field/Hawthorne Municipal Airport (HHR). This places a portion of the Project Site within the Planning Boundary/Airport Influence Area for LAX as designated in the Airport Land Use Plan (ALUP). The Project Site's location within the ALUP limits the nature and type of development that can occur. Additionally, the Aircraft Noise Mitigation Program (ANMP), which arises from federal and state regulations, established two strategies to manage the impacts of aircraft noise, including (1) sound insulation of structures, and (2) property acquisition followed by the conversion of an incompatible land use

¹ The East Transportation and Hotel Site could accommodate pick-ups and drop-offs of employees and attendees using private buses, charter buses, microtransit, TNCs, taxis, or other private vehicles. It would not be used as a connection point for public transportation options such as Metro buses.

to compatible land uses. In the 1990s, pursuant to the ANMP and the Federal Aviation Regulation (FAR) Part 150, the Los Angeles World Airports implemented a comprehensive program to provide residential sound proofing to homes that are impacted by an average noise level of 65 dB or more and also relocated hundreds of residential homes east of LAX, including homes east of LAX in the Manchester Square and Airport/Belford areas near LAX. LAX has also adopted a Federal Aviation Administration (FAA)-approved Noise Control/Land Use Compatibility Program, which makes certain residential areas in the City of Inglewood and other surrounding jurisdictions near LAX eligible for FAA funding.

Beginning in the mid-1980s, the FAA issued noise grants to the City of Inglewood as part of the LAX Noise Control/Land Use Compatibility Program, with the objective of recycling incompatible land uses to land uses which are compatible with the noise levels of airport operations. Under that program, the FAA and the City of Inglewood approved the acquisition of a number of parcels on the Project Site. In compliance with FAA grant agreements, the City must dispose of the land purchased under the grant at the earliest practicable time for fair market value, and use its best efforts to dispose of such land subject to the retention or reservation of any interest or right therein necessary to ensure that such land is used only for purposes which are compatible with the noise levels of operation of the airport. The FAA has stated that the Proposed Project appears to be a compatible use of the properties acquired in compliance with the FAA grant program, and that residential development of these noise-impacted properties is “inherently inconsistent with the intent of the City’s land acquisition/noise mitigation program, approved and funded by the FAA,” and that residential use of the properties “may be inconsistent with Grant Assurance #21, Compatible Land Use; and Grant Assurance 31, Disposal of Land.”²

The City of Inglewood Redevelopment Agency was established in 1969. On January 10, 2012, the City elected to become the Successor Agency of the former Inglewood Redevelopment Agency. All but 10 of the 41 parcels within the Arena Site are owned by the City or the Successor Agency. The remaining parcels within the Arena Site are privately-owned. Future uses on all parcels within the Arena Site are subject to review pursuant to the ALUP. The Well Relocation Site is owned by the City. All but one of the parcels within the West Parking Garage Site are owned by the City, with one owned by the Successor Agency. The East Transportation and Hotel Site is entirely owned by the Successor Agency.

In 1984, the LA Clippers relocated from San Diego to Los Angeles and played in the downtown Los Angeles Sports Arena for 15 years. In 1999, the LA Clippers moved to the nearby Staples Center which the team shares with the NBA’s Los Angeles Lakers, the National Hockey League’s Los Angeles Kings, and the Women’s National Basketball Association’s Los Angeles Sparks.³ Sharing the Staples Center with other organizations has created scheduling conflicts in the past. The LA Clippers’ team offices and practice and athletic training facilities are currently

² David F. Cushing, Manager, Los Angeles Airports District Office, U.S. Department of Transportation, Federal Aviation Administration, August 26, 2019.

³ Los Angeles Times, 1998. Clippers to Join Kings, Lakers in New Arena. Available: <http://articles.latimes.com/1998/apr/17/local/me-40174>. Accessed October 15, 2018.

located in downtown Los Angeles and in Playa Vista, respectively. The LA Clippers organization has stated its desire to consolidate its operations and facilities in a single location, along with a state-of-the-art, multi-purpose sports and entertainment center. Additionally, the LA Clippers organization seeks an opportunity to play home games in its own arena, where it has scheduling priority to maximize fan attendance and interest.

Initially approved on June 15, 2017, the City of Inglewood, the Successor Agency, the Inglewood Parking Authority, and Murphy's Bowl LLC entered into an Exclusive Negotiating Agreement (ENA) regarding the purchase of various parcels within the Project Site to allow the project applicant to propose and for the City to review and consider approval of the development of an NBA basketball arena complex that would become the new home of the LA Clippers.⁴ The ENA was amended and restated on August 15, 2017.

1.2 Purpose and Use of this EIR

As described in CEQA Guidelines section 15121(a), an EIR is a public information document that assesses potential environmental effects of a proposed project, as well as identifies mitigation measures and alternatives to a proposed project that could reduce or avoid adverse environmental impacts. CEQA requires that state and local government agencies consider the environmental consequences of projects over which they have discretionary authority. The Proposed Project, as defined in Chapter 2, Project Description, would require a discretionary action under CEQA and is the subject of this EIR. The EIR is an informational document used in the planning and decision-making process. The purpose of an EIR is not to advocate or recommend either approval or denial of a proposed project.

1.3 Recent Relevant Legislation

Assembly Bill 987 (AB 987)

AB 987 was signed by Governor Jerry Brown on September 30, 2018. The bill added section 21168.6.8 to the Public Resources Code (PRC section 21168.6.8) and provides for expedited judicial review in the event that the certification of this EIR or the granting of project approvals are challenged, so long as certain requirements are met. The provisions of PRC section 21168.6.8 are similar to the provisions of the Jobs and Economic Improvement through Environmental Leadership Act of 2011 (AB 900; PRC sections 21178 through 21189.3), which established expedited judicial review of certified Environmental Leadership Development Projects. In order to qualify for expedited judicial review under AB 987, the Proposed Project must implement a transportation demand management program that will achieve a 15 percent reduction in vehicle trips, and must not result in any net additional greenhouse gas emissions. Additionally, as a condition of approval of the Proposed Project, the City must require the project

⁴ City of Inglewood Office of the City Manager, 2017. Exclusive Negotiating Agreement with Murphy's Bowl LLC, a Delaware Limited Liability Corporation. Available: <https://www.cityofinglewood.org/AgendaCenter/ViewFile/Item/782?fileID=748>. Published June 15, 2017. Accessed October 3, 2018.

applicant to implement measures that will achieve reductions of specified amounts of certain criteria pollutants and toxic air contaminants.⁵ The Proposed Project has demonstrated that it meets the requirements of AB 987 (listed below), and was therefore certified as qualifying for expedited judicial review under AB 987 by the Governor on September XX, 2019.

The Proposed Project must:

- A. Receive Leadership in Energy and Environmental Design (LEED) gold certification for new construction within one year of the completion of the first NBA season.
- B. Implement trip reduction measures including the following:
 - i. Implementation of a transportation demand management plan that, upon full implementation, will achieve and maintain a 15 percent reduction in the number of vehicle trips, collectively, by attendees, employees, visitors, and customers as compared to operations absent the transportation demand management program;
 - ii. To accelerate and maximize vehicle trip reduction, each measure in the transportation demand management program shall be implemented as soon as feasible, so that no less than a 7.5 percent reduction in vehicle trips is achieved and maintained by the end of the first NBA season during which an NBA team has played at the arena;
 - iii. A 15 percent reduction in vehicle trips shall be achieved and maintained as soon as feasible, but not later than January 1, 2030. The applicant shall verify achievement to the lead agency and the Office of Planning and Research; and
 - iv. If the applicant fails to verify achievement of the reduction require by clause (iii), the lead agency shall impose additional feasible measures to reduce vehicle trips by 17 percent, or, if there is a rail transit line with a stop within one-quarter mile of the arena, 20 percent, by January 1, 2035.
- C. Be located on an infill site.
- D. Be consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of section 65080 of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.

AB 987 also requires that the Governor certify that the following conditions are met in order for the Proposed Project to qualify for expedited judicial review:

- (1) The Proposed Project will result in a minimum investment of one hundred million dollars (\$100,000,000) in California upon completion of construction.
- (2) The Proposed Project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, employs a skilled and trained workforce, as defined in subdivision (d) of Section 2601 of the Public Contract Code, provides construction jobs and permanent jobs for Californians, and helps reduce unemployment.

⁵ Office of the Governor, 2018. Assembly Bill 987 Signing Message. September 30. A copy of PRC section 21168.6.8 is contained in Appendix N of this Draft EIR.

(3) Compliance with AB 987 would require the Proposed Project to result in no net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation, as determined by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code. Not less than 50 percent of the greenhouse gas emissions reductions necessary to achieve this requirement must be from local, direct greenhouse gas emissions reduction measures, and the project applicant may obtain offset credits for up to 50 percent of the greenhouse gas emissions reductions necessary to achieve it.

(4) The project applicant demonstrates compliance with the solid waste and recycling requirements of Chapters 12.8 (commencing with Section 42649) and 12.9 (commencing with Section 42649.8) of Part 3 of Division 30, as applicable.

(5) The project applicant has entered into a binding and enforceable agreement that all mitigation measures required pursuant to CEQA and any other environmental measures required by AB 987 to certify the Proposed Project under AB 987 shall be conditions of approval of the Proposed Project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency.

(6) The project applicant agrees to pay any additional costs incurred by the courts in hearing and deciding any case subject to AB 987.

(7) The project applicant agrees to pay the costs of preparing the record of proceedings for the Proposed Project concurrent with review and consideration of the Proposed Project pursuant to CEQA.

AB 987 also requires that, as a condition of approval of the project, the lead agency shall require the project applicant, in consultation with the South Coast Air Quality Management District, to implement measures that will achieve criteria pollutant and toxic air contaminant reductions over and above any emission reductions required by other laws or regulations in communities surrounding the project. At a minimum, these measures must achieve reductions of a minimum of 400 tons of NO_x and 10 tons of PM_{2.5} over the 10 years following the commencement of construction of the Proposed Project. Of these amounts, a minimum of 130 tons of NO_x and 3 tons of PM_{2.5} would be achieved within the first year following commencement of construction of the Proposed Project. If the project applicant can demonstrate and verify to the South Coast Air Quality Management District that it has invested at least thirty million dollars (\$30,000,000) to achieve the requirements of this subdivision, the requirements of this subdivision shall be deemed met, so long as one-half of the reductions described above are met. Greenhouse gas emissions reductions achieved through these NO_x and PM_{2.5} reduction measures shall count toward the applicant's obligations to achieve 50 percent of the greenhouse gas reductions through local, direct greenhouse gas reduction measures.

In accordance with PRC section 21168.6.8(g), the City has prepared the record of proceedings concurrently with the preparation of the Draft EIR, is making the Draft EIR and all other documents submitted to or relied upon by the City in preparing the Draft EIR readily accessible in electronic format on the date of release of the Draft EIR. Further, as required, the City will make any documents prepared by the City or submitted to the City by the applicant after the release of the Draft EIR available to the public in a readily accessible electronic format within 5 days of release or receipt. Comments on the project received by the City in an electronic format will be made available within 5 days of receipt, and any comments not in electronic format will be converted and

made available in electronic format within 14 business days. These documents may be accessed from www.IBECProject.com. The Draft EIR will be circulated for a 48-day review public review and comment period beginning on September 17, 2019, and ending on November 4, 2019. A copy of PRC section 21168.6.8 is contained in Appendix N of this Draft EIR.

Finally, if the project is approved, the City must certify the final record of proceedings within 5 days of filing a Notice of Determination.

1.4 Environmental Review

1.4.1 Preliminary Project Evaluation

In its preliminary review of the application for the Proposed Project, the City, as the Lead Agency under CEQA, determined that the Proposed Project is subject to CEQA and determined that an EIR pursuant to CEQA Guidelines section 15161 is the appropriate environmental document. Having determined an EIR is required to evaluate changes in the environment that would result from construction and operation of the Proposed Project, the City elected not to prepare an Initial Study Checklist, as permitted by CEQA Guidelines section 15060(d).

1.4.2 EIR Scoping

On February 20, 2018, the City issued a Notice of Preparation (NOP) (included in Appendix A). The NOP public comment period ended on March 22, 2018. The NOP was distributed to governmental agencies, organizations, and persons interested in the Proposed Project. The City sent the NOP to agencies with statutory responsibilities in connection with the Proposed Project and requested their input on the scope and content of the environmental information that should be addressed in the EIR. The City Economic and Community Development Department's Planning Division held a Scoping Meeting on March 12, 2018, at Inglewood City Hall to provide information about the Proposed Project and the anticipated CEQA process, and to receive comments regarding the scope of the EIR.

Pursuant to PRC section 21099.4, the City consulted with identified responsible and trustee agencies throughout the preparation of this EIR. This includes meetings with those agencies identified in **Table 1-1**. In addition, the City conducted multiple meetings with other stakeholders to gather input.

In response to the NOP, the City of Inglewood received 75 written comment letters regarding the Proposed Project. All of the comment letters received by the City are provided in Appendix B. Comments pertaining to environmental issues analyzed in this EIR were considered in each technical section of Chapter 3, Environmental Setting, Impacts, and Mitigation Measures. The scope of this EIR includes environmental issues determined to be potentially significant as determined through preparation of the NOP, responses to the NOP, scoping meetings, and discussions with the public, consulting staff, and the City of Inglewood.

**TABLE 1-1
RESPONSIBLE AND TRUSTEE AGENCIES CONTACTED DURING PREPARATION OF THE DRAFT EIR**

Agency	Role
Responsible Agencies	
Federal Aviation Administration (FAA) / Airport Land Use Commission (ALUC)	Review and approval of Form 7460-1.
California Department of Transportation (Caltrans)	Review and consider impact analysis and mitigation measures for Caltrans maintained and operated facilities including freeways and on- and off-ramps.
California Department of Water Resources (DWR)	Approvals related to decommissioning and relocation of water well.
Los Angeles County Metropolitan Transportation Authority (Metro)	Review and consider impact analysis and mitigation measures for Metro-maintained and operated facilities including bus and light-rail facilities.
Los Angeles County Department of Environmental Health	Decommissioning and removal of existing well; remediation of onsite contamination.
Los Angeles Department of Health Services, Division of Drinking Water	Approvals related to decommissioning and relocation of water well.
Los Angeles County Sanitation District	Approvals related to decommissioning and relocation of water well.
Los Angeles County Flood Control District/ Dominguez Channel Watershed Group	Compliance with National Pollution Discharge Elimination System (NPDES) MS4 Permit.
South Coast Air Quality Management District (SCAQMD)	Review and consider impact analysis and mitigation measures related to air quality and potential related health risks.
Trustee Agencies	
California Department of Fish and Wildlife	Review and consider impact analysis and mitigation measures related to protected species, including those protected under the Migratory Bird Treaty Act (MBTA).
Federal Agencies	
Federal Aviation Administration	Review and approval of Form 7460-1.

This process identified potentially significant impacts associated with the construction and/or operation of the Proposed Project in the following issue areas:

- Aesthetics;
- Air Quality;
- Biological Resources;
- Cultural and Tribal Cultural Resources;
- Energy Demand and Conservation;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;

- Noise and Vibration;
- Population, Employment, and Housing;
- Public Services (Fire Protection and Emergency Medical Services and Facilities, Police Protection, Parks or Recreation Services, and Schools);
- Transportation and Circulation; and
- Utilities and Service Systems (Water Supply, Wastewater, Stormwater, and Solid Waste).

1.4.3 Project Variants

The environmental analysis in this EIR includes two Project Variants: the West Century Boulevard Pedestrian Bridge Variant and the Alternate Prairie Access Variant. These Project Variants are analyzed in Chapter 5, Project Variants, and are briefly described in Chapter 2, Project Description. These Project Variants are not proposed as part of the Proposed Project as there is uncertainty about the feasibility of the Project Variants. They are identified and analyzed in this EIR, however, to provide the flexibility to allow the City to approve them as part of the Proposed Project, if desired, and if the uncertainty around the implementation of one or both of the Project Variants can be overcome.

1.4.4 Public Review

The Draft EIR is available for public review and comment beginning September 24, 2019, and concluding at 5:00 PM on November 8, 2019. The Draft EIR can be accessed at the following locations:

City of Inglewood Website: <https://www.cityofinglewood.org/1036/Murphys-Bowl-Proposed-NBA-Arena>

Project Website: www.IBECProject.com

Printed copies of the Draft EIR will be available at the following locations:

City of Inglewood Main Library: 101 West Manchester Boulevard, Inglewood CA 90301

Inglewood Crenshaw-Imperial Branch Library: 11141 South Crenshaw Boulevard, Inglewood CA 90303

City of Inglewood Economic and Community Development Department: One West Manchester Boulevard, 4th Floor, Inglewood CA 90301

During the review and comment period, written comments (including email) regarding the Draft EIR may be submitted to the City at the address below.

Mindy Wilcox, AICP, Planning Manager
 City of Inglewood, Planning Division
 One West Manchester Boulevard, 4th Floor
 Inglewood, CA 90301
 Fax: (310) 412-5681
 E-Mail: ibecproject@cityofinglewood.org

1.4.5 Final EIR and EIR Certification

Following the public review and comment period for the Draft EIR, the City will prepare responses that address all substantive written and oral comments on the Draft EIR's environmental analyses received within the specified review period. The responses and any revisions to the Draft EIR will be provided in a Response to Comments document. The Draft EIR and its Appendices, together with the Response to Comments document, will constitute the Final EIR (commonly referred to collectively as the EIR) for the Proposed Project.

1.4.6 Mitigation Monitoring and Reporting Program

Throughout this EIR, mitigation measures have been clearly identified and presented in language that will facilitate establishment of a mitigation monitoring and reporting program. As required under CEQA, a mitigation monitoring and reporting program (MMRP) will be prepared at the time of certification of the Final EIR for the Proposed Project and will identify the specific timing and roles and responsibilities for implementation of adopted mitigation measures.

1.5 Document Organization

This Draft EIR document is organized as follows:

- **Summary** – This chapter provides a summary of the Proposed Project. This chapter includes an overview of the project description, identified areas of controversy, a discussion of key environmental effects, a discussion of significant and unavoidable impacts, a discussion of cumulative effects, an overview of alternatives, and a summary table that includes each environmental impact, level of impact, and all applicable mitigation measures.
- **Chapter 1, Introduction** – This chapter describes the Proposed Project background, other applicable legislation (AB 987), and the purpose and organization of the EIR.
- **Chapter 2, Project Description** – This chapter describes in detail all elements of the Proposed Project. The description includes, with text and graphics, the location and boundaries of the Proposed Project, statements of objectives from the project applicant and the City, and a description of the Proposed Project components and characteristics.
- **Chapter 3, Environmental Setting, Impacts, and Mitigation Measures** – For each environmental issue, this chapter discusses the environmental and regulatory setting, the methodology used, the detailed analysis of potential impacts (including direct, indirect, and cumulative impacts), and, if necessary, a discussion of potentially feasible mitigation measures.
- **Chapter 4, Other CEQA Required Considerations** – This chapter discusses several issues required to be included in an EIR, including effects not found to be significant, significant and unavoidable impacts, significant irreversible environmental changes, and any potential socioeconomic/urban decay-related impacts.
- **Chapter 5, Project Variants** – This chapter discusses and analyzes the potential impacts of the two variants of the Proposed Project.
- **Chapter 6, Alternatives** – This chapter describes potentially feasible alternatives to the Proposed Project that may avoid or substantially reduce one or more significant impacts while attaining most of the basic objectives of the Proposed Project, and evaluates the

comparative environmental effects of the alternatives. It also discloses those alternatives that were considered but rejected from detailed analysis.

- **Chapter 7, List of Preparers and Persons Consulted** – This chapter identifies the agency staff and consultants who prepared the EIR, and agencies or individuals consulted during preparation of the EIR.
- **Appendices** – The appendices include environmental scoping information and technical reports and data used in the preparation of the Draft EIR. These documents are included in electronic format at the back of the Draft EIR and printed copies are available for review at the City offices.

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