

3.13 Public Services

This section describes and evaluates potential adverse physical environmental impacts related to public services that could result from implementation of the Proposed Project. Public services analyzed within this section include fire protection and emergency medical services, police protection, parks or recreational services, and public schools. This section contains: (1) a description of the existing environmental setting for public services; (2) a description of the Adjusted Baseline Environmental Setting that serves as the basis for impact analysis; (3) a summary of the regulations related to public services; and (4) an analysis that addresses whether potential impacts to public services would require the need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. This section also includes an analysis of whether the Proposed Project would result in significant environmental impacts related to parks and recreational resources.

Comments received in response to the NOP for the EIR regarding public services can be found in Appendix B. Any applicable issues and concerns regarding potential impacts related to public services as a result of implementation of the Proposed Project are analyzed within this section.

The analysis in this section was developed based on information provided in correspondence with the Los Angeles County Fire Department (LACFD), the City of Inglewood Police Department (Inglewood PD or Police Department), the City of Inglewood Parks, Recreation and Library Services (Parks Department), and the Inglewood Unified School District (IUSD). Letters of correspondence with these agencies are contained in Draft EIR Appendix X.

Fire Protection and Emergency Medical Services

3.13.1 Environmental Setting

Regional and Local Setting

Fire Protection, Facilities, and Emergency Medical Services

Los Angeles County Fire Department Resources

In the City of Inglewood, fire protection and emergency medical services are provided by the LACFD. The LACFD provides 24-hour, all-risk emergency services to a population of over four million residents living and working in 59 cities and all unincorporated communities within Los Angeles County. The LACFD provides emergency services and response to a wide range of incidents including structure fires, wildfires, commercial fires, hazardous materials incidents, urban search and rescue, and swift water rescue. There are three major geographic regions (the North Regional Operations Bureau, the Central Regional Operations Bureau, and the East Regional Operations Bureau), nine emergency operation divisions, and 22 battalions within the LACFD service area. The LACFD is comprised of 173 fire stations, 9 wildland fire camps, and 159 lifeguard towers and includes 109 paramedic squads/units and 8 helicopters of which three would be designated as paramedic air squads. LACFD staff consists of 4,696 total emergency

responders and business professionals, including 3,157 firefighters, who are also trained in infectious disease response, and 681 paramedics. There are approximately 1,100 emergency responders on duty each day.¹

The Project Site is located within Division VI, Battalion 20, of LACFD's Central Regional Operations Bureau.² Division VI consists of Battalions 13 and 20 with 14 fire stations which serve six cities including Cudahy, Huntington Park, Inglewood, Lynwood, Maywood, and South Gate. Battalion 20 operates six fire stations; five of which have first due-in jurisdiction within the City, and four of which are located within the City. These fire stations have primary responsibility for the City.³ In addition, 10 fire stations are located within a three-mile radius of the City and are located within the cities of Hawthorne and Lawndale, and within the unincorporated communities of Lennox, Westmont, Baldwin Hills, and Ladera Heights. The Battalion 20 Headquarters is located within Fire Station 171 at 141 W. Regent Street, Inglewood.⁴

LAFCD Stations Serving the Project Site

The LACFD operates under a regional concept in its approach to providing fire protection and emergency medical services. Emergency response units are dispatched as needed to an incident anywhere in the Division's service territory based on distance and availability without regard to jurisdictional or municipal boundaries. Specifically, calls received by the dispatch center are dispatched to the jurisdictional engine company for the incident location. If the jurisdictional engine company is not available, the next nearest available unit will respond. Depending on the incident type, several units may be dispatched to an incident in accordance with the level of service required. For instance, an emergency medical service incident will require the nearest available basic life support unit (i.e., engine), the nearest advance life support unit (i.e., paramedic squad) and an ambulance.⁵

There are three fire stations that provide primary fire protection and emergency medical services to the Project Site (i.e., the Arena Site, the West Parking Garage Site, the East Parking and Hotel Site, and the Well Relocation Site), the locations of which are shown in **Figure 3.13-1**.

Table 3.13-1 includes the fire station number and location, approximate drive distance/direction from the Project Site, staffing, and equipment.

¹ Los Angeles County Fire Department, 2016. *Strategic Plan, Annual Report 2013-2015*, 2016.

² Los Angeles County Fire Department, *Regional Inspection Offices, Central Region Offices*, <http://www.fire.lacounty.gov/fire-prevention-division/regional-inspection-offices-cl/>. Accessed October 11, 2018.

³ Los Angeles County Fire Department, 2016. *Strategic Plan, Annual Report, 2013-2015*, 2016.

⁴ Los Angeles County Fire Department, *Los Angeles County Fire Department – Station 171 (Battalion 20 Headquarter)*, <https://locator.lacounty.gov/fire/Location/3056898/los-angeles-county-fire-department---station-171-battalion-20-headquarters>. Accessed August 2018.

⁵ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018.

**TABLE 3.13-1
 LACFD FIRE STATIONS LOCATED IN THE PROJECT VICINITY**

Station No. and Location	Approximate Drive Distance/ Direction From Project Site^a	Staffing (24-hour duty)	Equipment
LACFD Fire Station 170 10701 South Crenshaw Boulevard, Inglewood	1.3 miles southeast	Quint ^b : 1 captain, 1 fire fighter specialist, 1 fire fighter paramedic, 1 fire fighter. Engine: 1 fire fighter specialist, 1 fire fighter.	4-person assessment quint and a 2-person engine.
LACFD Fire Station 18 4518 West Lennox Boulevard, Inglewood	1.3 miles southwest	Engine: 1 captain, 1 fire fighter specialist, 2 fire fighter paramedics.	4-person paramedic engine company.
LACFD Fire Station 173 9001 South Crenshaw Boulevard, Inglewood	1.5 miles northeast	Engine: 1 captain, 1 fire fighter specialist, 1 fire fighter paramedic Squad: 2 fire fighter paramedics.	3-person engine company and a 2-person paramedic squad.

NOTES:

^a Approximate drive distance was measured from the approximate center of the Arena Site.

^b A quintuple combination pumper or "quint" is a fire apparatus that serves the dual purpose of an engine and a ladder truck.

SOURCE: Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018; Los Angeles County Fire Department, Fire Station Locator, <https://locator.lacounty.gov/fire/Search?find=&near=3900+W+Century+Blvd+Inglewood%2C+CA+90303&cat=&tag=&loc=&lat=33.944963505492886&lon=-118.34210286941102>. Accessed October 2018.

As shown in Table 3.13-1 and Figure 3.13-1, there are three fire stations located within 1.5 miles of the Project Site.⁶ These three fire stations would be the first stations to respond to an incident at the Project Site. Fire Station 170, located at 10701 S. Crenshaw Boulevard, is the jurisdictional station and first due-in fire station,⁷ which is the fire station with primary responsibility, for the portions of the Project Site east of Prairie Avenue, including the Arena Site, the East Parking and Hotel Site, and the Well Relocation Site. Fire Station 170 is the second due-in fire station for the West Parking Garage Site. Fire Station 18 at 4518 W. Lennox Boulevard, is the jurisdictional station and first due-in fire station for the West Parking Garage Site and is the second due-in fire station for the Arena Site, the East Parking and Hotel Site, and the Well Relocation Site. Fire Station 173 at 9001 S. Crenshaw Boulevard, is the third due-in fire station for the for all portions of the Project Site.

Fire Station 173 is the jurisdictional station and the first due-in fire station for the Hollywood Park Specific Plan area, including the NFL Stadium, as well as for The Forum. If needed and available, Fire Station 170 could be dispatched to provide back-up service to an incident in Fire Station 173's jurisdiction. Additionally, Fire Stations 162, 171, 161, and 172, all located within approximately 2.5 miles of the Project Site, would provide further backup in the event of a major fire at the Arena Site.^{8,9}

⁶ Approximate drive distance was measured from the approximate center of the Arena Site.

⁷ The term "due-in" is used to establish the order of response. So the first due-in station would respond first, the second due-in station would respond next, and so on depending on the magnitude of the incident and corresponding need for LACFD response.

⁸ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018.

⁹ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated January 24, 2019.

In the event that Fire Station 170 could not meet the immediate needs of a call for services independently or does not have the capability to address the full extent of a larger incident, the nearest available LACFD resources would respond to provide support.¹⁰ [Note to City: Information to come about specialized equipment available at Fire Station 170.] The LACFD dispatches multiple units from multiple fire stations in the event of a large incident. An acceptable equipment level is maintained throughout the Department's jurisdictional boundaries to enable the appropriate response to all incidents. For similar venues, the LACFD's first response to a fire incident would be five engines, 2 quints (which are combination engine/ladder truck apparatus), 1 squad, and 2 battalion chiefs. Additional resources would be deployed as needed.¹¹

LAFCD Response Times

The LACFD uses the national guidelines of a 5-minute response time for the first arriving unit for fire and emergency medical service responses and an 8-minute response time for the advanced life support (paramedic) unit in urban areas.¹² According to the LACFD, Fire Station 170, the first due-in station for the Project Site east of Prairie Avenue, is estimated to have an emergency average response time of 5 minutes to the Arena Site, the East Parking and Hotel Site, and the Well Relocation Site. Fire Station 18, the first due-in station for the Project Site west of Prairie Avenue, is estimated to have an emergency average response time of 5 minutes to the West Parking Garage Site. Therefore, both Fire Stations 170 and 18, the first due-in stations for the entirety of the Project Site, are currently meeting the response time guidelines of the LACFD.^{13,14}

Average response times are not necessarily representative of the actual time required to reach a site from a fire station, but are an indication of the average time needed to reach any given destination within each station's respective service area. Actual response time to a given location depends on individual factors such as distance between a fire station and a location, traffic volumes, roadway characteristics, and topography.

Emergency Access

The Project Site is generally accessible by LAFCD emergency vehicles from a number of major roadways (i.e., West Century Boulevard, South Doty Avenue, West 102nd Street, and South Prairie Avenue), as described below.

- Fire Station 170 has access to the Project Site from South Crenshaw Boulevard to West Century Boulevard, from South Crenshaw Boulevard to West 104th Street to South Prairie Avenue, or from South Crenshaw Boulevard to West 104th Street to South Doty Avenue to West 102nd Street.

¹⁰ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated January 24, 2019.

¹¹ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated January 24, 2019.

¹² Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018.

¹³ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018.

¹⁴ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated January 24, 2019.

- Fire Station 18 has access to both the Project Site from West Lennox Boulevard to Hawthorne Boulevard to West Century Boulevard, or from West Lennox Boulevard to South Prairie Avenue.
- Fire Station 173 has access to the Project Site from South Crenshaw Boulevard to West Century Boulevard, from South Crenshaw Boulevard to West Century Boulevard to South Doty Avenue to West 102nd Street, or from South Crenshaw Boulevard to West Century Boulevard to South Prairie Avenue.

Water Infrastructure/Fire Flow for Firefighting Services

All but six of the parcels that make up the Project Site are currently vacant. The six developed parcels include a fast food restaurant, a motel, a light manufacturing/warehouse facility, a warehouse, a commercial catering business, and a groundwater well and related facilities, all of which are currently operational and in use. The existing water infrastructure serving the Project Site consists of water mains located within West Century Boulevard, West 101st Street, West 102nd Street, West 103rd Street, and South Prairie Avenue.¹⁵ Specifically, three existing water mains with diameters of 8 inches, 36 inches, and 54 inches are located within West Century Boulevard north of the Project Site. Additional existing water mains located within the vicinity of the Project Site include an 8-inch line within West 101st Street, a 27-inch line and 6-inch line within West 102nd Street, an 8-inch line within West 103rd Street, and an 8-inch line within South Prairie Avenue. The existing structures on the Project Site are currently protected by existing public fire hydrants located in the nearby vicinity. Seven existing fire hydrants are located on the south side of West Century Boulevard which includes one hydrant located immediately north of the West Parking Garage Site; one hydrant located immediately west of South Prairie Avenue; three hydrants located north of the Arena Site; and two hydrants located east of South Doty Avenue and immediately north of the East Parking and Hotel Site. One fire hydrant is located on the south side of West 101st Street west of South Prairie Avenue. Two hydrants are located on the south side of West 102nd Street west of South Prairie Avenue with two additional hydrants located on the south side of West 102nd Street east of South Doty Avenue. Three existing fire hydrants are located on the west side of South Prairie Avenue which includes one hydrant located immediately south of West 101st Street; one hydrant located north of West 103rd Street; and one hydrant located north of West 104th Street.

Water for firefighting purposes is supplied to the Project Site by the Golden State Water Company (GSWC) Southwest District water system located in Los Angeles County. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type of occupancy, and degree of fire hazard.

3.13.2 Adjusted Baseline Environmental Setting

As described in Chapter 3.0, Section 3.0.5, Section 3.13, Public Services, assumes the Adjusted Baseline Environmental Setting. Related to Fire Protection, the changes associated with the

¹⁵ [Confirming letter in transit](#)

Hollywood Park Specific Plan Adjusted Baseline development include provision of fire protection infrastructure to serve the HPSP development (water mains, fire hydrants, code-required sprinkler systems, etc.). No other changes to the existing environmental setting would occur under the Adjusted Baseline.

3.13.3 Regulatory Setting

Federal

There are no federal regulations, plans, or policies applicable to fire protection and emergency medical services relevant to the Proposed Project.

State

California Code of Regulations, Title 24, Part 2, 2016 California Building Code; Part 9, 2016 California Fire Code

The California Code of Regulations (CCR), Title 24, Part 2, 2016 California Building Code (2016 CBC) is a compilation of building and fire safety standards.¹⁶ The 2016 CBC standards comprise a combination of building standards that have been adopted by State agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature, not covered by the national model code.

The CCR, Title 24, Part 9, 2016 California Fire Code (2016 CFC) is part of the 2016 CBC.¹⁷ The purpose of the 2016 CFC is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety and general welfare from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. Typical fire safety requirements of the 2016 CFC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction. The 2016 CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific 2016 CFC regulations have been incorporated by reference with amendments in the Los Angeles County Fire Code, which has been adopted by the City of Inglewood and discussed further below.

California Occupational Safety and Health Administration

In accordance with California Code of Regulations, Title 8 Sections 1270 “Fire Prevention” and 6773 “Fire Protection and Fire Equipment,” the California Occupational Safety and Health Administration (Cal OSHA) has established minimum standards for fire suppression and

¹⁶ California Building Standards Commission, 2016. *California Building Code, California Code of Regulations, Title 24, Part 2, Volumes 1 and 2*. Available at: [HYPERLINK "http://www.bsc.ca.gov/Codes.aspx"]. Accessed August 2018.

¹⁷ California Building Standards Commission, 2016. *California Fire Code, California Code of Regulations, Title 24, Part 9*, July 2017. Available at: <http://www.bsc.ca.gov/Codes.aspx> and <http://www.citymb.info/home/showdocument?id=28089>. Accessed August 2018.

emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose size requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance and use of all firefighting and emergency medical equipment.

Local

Los Angeles County Fire Department Strategic Plan 2017-2021

The 2017-2021 LACFD Strategic Plan (Strategic Plan)¹⁸ serves as a roadmap to communicate the LACFD's goals and actions needed to achieve the goals. The Strategic Plan is designed to address short and long term challenges and to carry out the County's public safety mission in meeting the current and future needs of over four million residents living and working in communities throughout the County.

Los Angeles County Developer Fee Detailed Fire Station Plan

The 2017 LACFD Developer Fee Detailed Fire Station Plan (Plan)¹⁹ reflects the Consolidated Fire Protection District's (Fire District) fire service requirements as of September 2017 based upon growth projections and contacts with cities and developers who have shared their development plans with the Fire District. The Plan identifies 18 additional fire stations, one replacement station, one station expansion, two helispots, and the necessary capital equipment that will be required in the areas of benefit. The Plan also identifies the anticipated costs and time frames of development. The anticipated costs identified in the Plan will be funded by developer fee revenues or funds which the Fire District has advanced from Fire District general revenues or certificates or participation. These advances will be repaid to the Fire District when sufficient developer fee revenue is generated. If no amount is budgeted, the development of the fire stations may be delayed until developer fee revenues are sufficient to fund the site acquisition and/or construction of the fire station.

Los Angeles County, Code of Ordinances, Title 32, Fire Code

The Los Angeles County, Title 32, Fire Code,²⁰ establishes regulations affecting or relating to structures, processes, premises, and safeguards regarding: conditions affecting the safety of the firefighters and emergency responders during emergency operations; and fire hydrant systems, water supply, fire equipment access, posting of fire equipment access, parking, lot identification, weed abatement, abatement of combustible brush and vegetation that represents an imminent fire hazard, debris abatement, combustible storage abatement including flammable liquid storage,

¹⁸ Los Angeles County Fire Department, 2016 and 2017. *Strategic Plan, 2015-2017 and the Strategic Plan Accomplishments 2015-2017*. March 2016, and September 2017.

¹⁹ Los Angeles County Fire Department, 2017. *Strategic Plan Accomplishments 2015-2017, September 2017*.
¹⁹ Los Angeles County Fire Department, 2017. *Developer Fee Detailed Fire Station Plan for the County of Los Angeles Developer Fee Program for the Benefit of the Consolidated Fire Protection District of Los Angeles County*, November 28, 2017.

²⁰ Los Angeles County. *Los Angeles County Code, A Codification of the General Ordinances of Los Angeles County, California, Title 32, Fire Code*. Available at: https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT32FICO. Accessed August 2018.

hazardous material storage and use, open-flame and open-burning, and burglar bars at State-regulated mobile home and special occupancy parks within the jurisdiction of the LACFD.

City of Inglewood Municipal Code, Chapter 6, Fire Prevention

Per Chapter 6, Fire Prevention, Article 1, Fire Code and Amendments, Section 6-1, Los Angeles County Fire Code Adopted,²¹ of the City of Inglewood Municipal Code (Municipal Code), the City has adopted by reference and incorporated the Los Angeles County, Title 32, Fire Code, as the City's Fire Code. Section 6-2 of the City's Fire Code includes additions to the Los Angeles County Fire Code.

City of Inglewood General Plan

The City of Inglewood General Plan, Land Use Element, adopted in 1980 and amended in 1986, 2009, and 2016, presents a long-range plan for the distribution and future use of land within the City. The Land Use Element analyzes population, existing and future land use requirements, and proposed implementation techniques. It provides a framework upon which the development of public and privately owned land can be based.²²

The City of Inglewood General Plan, Safety Element, adopted in July 1995, is designed to ensure that the citizens of Inglewood can be protected from unreasonable risks caused by natural and manmade disasters. The City's goals are to minimize the dangers associated with natural and manmade hazards by implementing standards, regulations and laws that will reduce loss of life, injuries and property damage resulting from disasters, and to provide for the continuity of governmental operations and civilian life during and after a major disaster.²³

The following goals and objectives from the City of Inglewood General Plan Land Use Element and the Safety Element are applicable to the Proposed Project:

Land Use Element

Goal: Maintain the present high level of police and fire services to the extent it is fiscally prudent.

Safety Element

Goal 6: Public safety personnel provide improved response and services to the community.

Policy: Provide sufficient manpower and equipment to respond adequately to fire emergencies and civil disturbances.

As further discussed below in Impact 3.13-1, three fire stations are located within 1.5 miles of the Project Site while additional four fire stations are located within 2.5 miles of the Project Site. According to the LACFD, the estimated average response time to the Project Site from Fire Station 170, the first due-in station, is 5 minutes, which meets the response time guidelines of the

²¹ City of Inglewood. *Municipal Code, Chapter 6, Fire Prevention*. Available at: <https://www.qcode.us/codes/inglewood/>. Accessed August 2018.

²² City of Inglewood, 2016. *City of Inglewood General Plan, Land Use Element*, September 14, 2016.

²³ City of Inglewood, 1995. *City of Inglewood General Plan, Safety Element*, July 1995.

LACFD. Further, the Proposed Project would generate revenue for both the Los Angeles County Developer Fee Detailed Fire Station Plan and the City's general fund that could be used to fund LACFD expenditures as necessary to offset incremental Proposed Project effects on fire protection manpower or equipment. The Proposed Project has no potential inconsistencies with the above-referenced goals and policies of the City of Inglewood General Plan Land Use and Safety Elements. Ultimately, it is within the authority of the City Council to determine if the Proposed Project is consistent with the City of Inglewood General Plan.

3.13.4 Analysis, Impacts and Mitigation

Significance Criteria

The City has not adopted thresholds of significance for analysis of impacts to fire protection and emergency services. The following thresholds of significance have been adapted from CEQA Guidelines section 15065 and CEQA Guidelines Appendix G. A significant impact would occur if the Proposed Project would:

1. Result in substantial adverse physical impacts associated with the provision of or need for new or physically altered facilities for the provision of fire protection and emergency medical services, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.

Consistent with the requirements of CEQA as articulated in California First District Court of Appeal decision in *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833,²⁴ significant impacts under CEQA involve adverse physical changes in the environment as a result of implementation of a project. Pursuant to this case, "the city has a constitutional obligation to provide adequate fire protection services," and potential effects on public safety services are not in and of themselves an environmental impact that CEQA requires a project applicant to mitigate. The Court stated that "the obligation to provide adequate fire and emergency medical services is the responsibility of the city." (Cal. Const., art. XIII, § 35, subd. (a)(2) ["The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services."].) Thus, the focus of analysis in this section is not on whether the Proposed Project would result in the need for additional fire protection and emergency medical services (i.e., personnel, equipment), per se, but rather is on the question of whether provision of any required resources (e.g., construction of a new fire station) would result in significant physical adverse impacts on the environment.

Methodology and Assumptions

Fire protection and emergency medical service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the physical characteristics

²⁴ Court of Appeal of the State of California, First Appellate District, Division Three, 2015. *City of Hayward v. Board of Trustees* (Alameda County Superior Court No. RG09480852); *Hayward Planning Association et al., v. Board of Trustees of the California State University*, Filed November 30, 2015.

of the City's built environment and infrastructure. Changes in these factors resulting from construction and operation of the Proposed Project may increase demand for or delivery of public services. The LACFD evaluates the demand for fire protection and emergency medical services on a project-by-project basis, including review of a project's emergency features and/or design features, to determine if a project would require additional equipment, personnel, new facilities, or alterations to existing facilities. Beyond the standards included in the City's Fire Code, consideration is given to the size (height and physical configuration) of a project, uses proposed, fire flow necessary to accommodate a project, distance to the site for engine and truck companies, response time, fire hydrant sizing and placement standards, access, and the project's potential to use or store hazardous materials. The proposed closure of portions of West 101st and West 102nd Streets is also considered in the analysis.

The LACFD was consulted for this analysis and the responses provided regarding the Proposed Project were incorporated. In addition, the LACFD website and applicable provisions of the City of Inglewood's Fire Code were reviewed. Based on this information and consultation with the LACFD, a determination was made as to whether the LACFD would require new or physically altered facilities for the provision of fire protection and emergency medical services in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. If such facilities would be required, the analysis considers whether the LACFD's construction of such facilities would reasonably be expected to cause significant environmental impacts. The potential impacts associated with use or storage of hazardous materials are discussed in Section 3.8, Hazards and Hazardous Materials. For a discussion of the effects of projected future traffic and transportation conditions on emergency access, please refer to Section 3.14, Transportation and Circulation. The letter of correspondence with the LACFD is contained in the Draft EIR Appendix X.

Impacts and Mitigation Measures

Impact 3.13-1: Implementation of the Proposed Project could result in substantial adverse physical impacts associated with the provision of new or physically altered facilities for the provision of fire protection and emergency medical services, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. (Less than Significant)

Construction

There are a number of ways in which construction of the Proposed Project could result in increased demand for fire protection and emergency medical services as discussed further below.

Response to Construction Accidents

Construction of the Proposed Project would occur over approximately 36 months starting in 2021 and concluding in 2024. Approximately 1,140 construction workers would be employed during construction of the Proposed Project. The number of construction workers present on-site daily would vary, depending on the specific construction activities being performed and the overlap between construction phases. It is estimated that ~~up to a maximum of approximately 600~~ or more

construction workers would be active on the site ~~at any one time~~ during the most intense periods of construction of the Proposed Project.

The risks associated with construction activities would vary depending on the nature of the activity that is occurring. Construction activities associated with the demolition of the existing on-site structures, excavation, and construction of the Proposed Project could result in accidents that could require fire protection and emergency medical services response. Construction accidents could result from occasional exposure of workers to combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. Construction accidents could also occur in the use of construction equipment, or as a result of falls or other mishaps. Although the Proposed Project is relatively large in size and scope, the construction activities, methods, and equipment that would be employed are typical for the construction of large projects, ~~and there is nothing about the Proposed Project that presents a heightened construction risk.~~

In compliance with the Cal OSHA and fire and building requirements of the City's Fire Code, all of which are regularly enforced through the City's Building Safety Division building inspection services, construction personnel for the Proposed Project would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction vehicles would be maintained on-site. Additionally, construction of the Proposed Project would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials.

Through compliance with City and State regulations, which would be enforced and monitored by City building inspectors, the Proposed Project would avoid creating a new material demand for fire protection and emergency medical services that could require construction of new facilities that could adversely affect the environment. Further, according to the LACFD, an acceptable equipment level is maintained throughout the Department's jurisdictional boundaries to enable the appropriate response to all incidents.²⁵ It should be noted that the LAFCD has provided emergency response through the construction of the Stadium at the Los Angeles Entertainment and Sports District, without need for augmented services. The Proposed Project is a smaller structure with a smaller construction staff and shorter construction period than the Stadium. There is no evidence in the record to suggest that existing LAFCD capacity is insufficient to meet the needs of construction accidents that could occur during construction of the Proposed Project.

Operation

Demand for Fire Protection, Facilities, and Emergency Medical Services

The adequacy of fire protection and emergency medical services for a given area is based on the size of a project, the uses proposed, operational-related traffic congestion, the number of people who intermittently or permanently occupy the Project Site, the fire flow necessary to

²⁵ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated January 24, 2019.

accommodate a project, the distance to the site for engine and truck companies, the response time, fire hydrant sizing and placement standards, access, and the project's potential to use or store hazardous materials. According to the LACFD, there are no planned improvements to fire stations in the immediate area of the Project Site or Project area.²⁶

Patron, Employee, Customer, and Visitor Effects on Demand

The Proposed Project would result in an increased number of people at and in the vicinity of the Project Site, including patrons attending LA Clippers homes games and other events such as concerts, conventions, family shows, corporate/community events, plaza events and other events; employees of the LA Clippers; temporary event-related employees; LA Clippers employees, as well as customers and employees of the restaurant, retail, sports medicine clinic, and hotel uses; and visitors to the community uses and plaza. Because the Proposed Project would not include residential uses, there would be no permanent increase in residential population at the Project Site.

The average attendance at LA Clippers home basketball games is anticipated to be 16,000 with a maximum attendance of 18,000 attendees and up to 1,320 event-related employees. Other events such as concerts, family shows, conventions and corporate or civic events, and non-LA Clippers sporting events would take place in the proposed arena throughout the year, with attendance ranging from small events of approximately 300-2,000 attendees to large center-stage concert capacity of 18,500 attendees. Intermittent increases in pedestrian activity and the number of people at and in the vicinity of the Project Site, as well as the potential increase in vehicle/pedestrian conflicts and accidents before, during and after events, would likely result in periodic increases in demand for fire protection and emergency medical services from the LACFD compared to baseline conditions. ~~As explained below, however~~Based on discussions with the LAFCD, District's regional approach to service delivery, which allows for the response from any number of available fire stations in the project vicinity (the closest are Stations 170, 18, and 173), the periodic increase in demand would be accommodated by existing service providers the LAFCD without causing the need for new or physically altered facilities.²⁷

Project Design

The Proposed Project would be designed and operated in compliance with the City's Fire Code. New construction would also be subject to other requirements of the City's Fire Code, the City's Building Code, and the LACFD that address structure and plaza design and building materials. The Proposed Project design would include fire resistant doors and materials, as well as walkways, stairwells, and elevator systems (including emergency and fire control elevators) that meet code requirements. The Proposed Project's fire safety features would include the installation of automatic fire sprinkler systems, smoke detectors, fire extinguishers, a fire alarm system,

²⁶ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018.

²⁷ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated January 24, 2019.

building emergency communication system and smoke control system, and appropriate signage and internal exit routes to facilitate a building evacuation if necessary.

Arena operations would include procedures that would be in place to assist the LACFD during an emergency incident. These procedures would include (1) a drill procedure to prepare for emergency incidents; and (2) an on-site emergency assistance center/first aid station with emergency equipment and on-site medical personnel to provide first aid to game/event patrons or employees that may require medical assistance. Further, ambulance services would be on-site and available during all large sporting events and other large events, as may be determined appropriate by the LACFD.

The Arena design would include two locations within the Arena Structure that would be used by the LACFD, Inglewood PD, and/or the Arena operator's private security and emergency medical personnel for security/command center functions, including coordination of incident response, communication and surveillance, and deployment of traffic control officers and/or City public works personnel prior to, during, and after events. The two security and command center spaces would include:

- A 3,000 square-foot security space included on the event level (below grade), which would be designed to serve as the command center and primary security area for staging, vehicle and equipment storage, and performing security checks for entry at the event level; and
- A second 4,000 square-foot security space included on the plaza level (at grade) which would be designed to serve as the secondary staging area for security personnel, along with providing employee and press check-in.

The Proposed Project would provide access for LACFD apparatus and personnel to the Project Site in accordance with LACFD requirements, inclusive of standards regarding fire lane widths, driveways and turning radii and with capacities needed to support fire fighting vehicles, and markings and on-site vehicle restrictions to ensure safe access. All water systems and driveways would be completed to the satisfaction of the LACFD prior to issuance of building permits. LACFD approval of plot plans showing the fire hydrants and access for each phase of the Proposed Project would be required prior to the recording of the final map for that phase. LACFD approval of definitive plans and specifications, and any associated permits, would be required prior to commencement of any portion of the Proposed Project. Each phase would be required to comply independently with code requirements.

Implementation of the Proposed Project would include the vacation of portions of two existing City streets:

- An approximately 800-foot linear section of West 102nd Street between South Prairie Avenue to be developed as part of the Arena Site; and
- An approximately 300-foot linear section of West 101st Street between South Prairie Avenue and South Freeman Avenue to be developed with a portion of the parking garage building within the West Parking Garage Site.

As discussed above, the estimated response time to the Project Site from the first due-in Fire Stations 170 and 18 meet the 5-minute response time guidelines of the LACFD. According to the LACFD, as the street vacations would not change the response times from Fire Stations 170, 18 and other responding fire stations to the Project Site.²⁸

Due to the building design, fire safety features, emergency safety provisions, LACFD access, construction measures, water system improvements, and hydrant spacing,²⁹ the design of the Proposed Project would not result in a substantial increase in demand for additional fire protection and emergency medical services that would exceed the capability of the LACFD to serve the Proposed Project such that it would require construction of new fire facilities.

As discussed above, because of current and anticipated construction schedules, the City is reasonably assured that the Hollywood Park Specific Plan Adjusted Baseline projects will be built and operational by 2024 when the Proposed Project is expected to be opened. Thus, the consideration of the Proposed Project effects must be viewed assuming construction and operation of the assumed parts of the HPSP, including the Stadium. Based on review of submitted plans and discussions with the LAFCD, it is anticipated that the HPSP Adjusted Baseline projects would include safety features similar to those described for the Proposed Project. Input provided by the LAFCD indicates that no additional fire protection or emergency service facilities would be necessary to serve both the Proposed Project and the HPSP Adjusted Baseline projects.³⁰

As such, under the Adjusted Baseline conditions, it is not anticipated that the Proposed Project would result in a substantial increase in demand for additional fire protection and emergency medical services that would exceed the capability of the LACFD such that it would require construction of new fire protection or emergency service facilities.

Traffic Effects on Emergency Response

A discussion of the effects of projected future traffic and transportation conditions on emergency access, including a discussion of the Event Transportation Management Plan (TMP), please refer to Section 3.14, Transportation and Circulation. For informational purposes, the TMP is discussed summarily here, and in further detail in section 3.14, Transportation and Circulation, and is included in Appendix X in this Draft EIR.

The arena operator would coordinate with the LACFD, the Inglewood PD, and the City of Inglewood Public Works Department to implement the traffic control measures included in the Event Transportation Management Plan (TMP). The Event TMP is a management and operating plan designed to facilitate multi-modal travel to and from events at the Project Site in a safe and efficient manner during event days. Pursuant to approvals by the City Public Works and Police

²⁸ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated January 24, 2019.

²⁹ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018. (Draft EIR Appendix X)

³⁰ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated January 24, 2019.

Departments, the arena operator would provide traffic control personnel and services on public streets in the vicinity of the Project Site, as necessary to facilitate safe movement of pedestrians, bicycles, and vehicles. The Event TMP would be designed to ensure access to/from the Project Site and project vicinity through techniques potentially including, but not limited to, traffic signal controls and timing, traffic control officers positioned in key locations around the Project Site, temporary lane or street closures, and/or changeable message signs. The Event TMP would be a working document that could be adaptively managed and refined over time by the arena operator, the LACFD, the Inglewood PD, and the City of Inglewood Public Works Department. The Event TMP is further described in Section 3.14.

Water Infrastructure/Fire Flow for Firefighting Services

As discussed above under Environmental Setting, the local water distribution network includes water mains beneath West Century Boulevard, West 103rd Street, South Prairie Avenue, and South Doty Avenue. There are 16 existing public fire hydrants located in public rights-of-way adjacent to the Project Site. Under the Adjusted Baseline, there are existing public fire hydrants and proposed public and private fire hydrants located within the Hollywood Park Specific Plan area. The fire flows and location/spacing of the proposed private and public fire hydrants of the Hollywood Park Specific Plan Adjusted Baseline projects would meet the requirements of the City's Fire Code and the LACFD.

Water infrastructure for the Proposed Project would involve a combination of tying into existing water lines, removing and relocating water lines, and construction of new water mains and lines. A new 27-inch water transmission line would be constructed from the intersection of South Prairie Avenue/West 102nd Street southward to the driveway to the Arena Site. The new water transmission line would wrap around the Arena Site within a new roadway right-of way, and would connect with an existing water line at the intersection of the new roadway/West 102nd Street, immediately east of the Arena Structure. Six-, 10- and 12-inch domestic water lines would be extended from existing water lines into the Project Site. Water line connections would occur on the Project Site or within public rights-of-way. On the West Parking Garage Site, approximately 340 linear feet of water main line within West 101st Street would be abandoned and re-routed to continue serving surrounding users. An existing water line in the section of West 102nd Street to be vacated would be removed and relocated. Impacts associated with the construction of these water facilities are analyzed in Section 3.15, Utilities and Service Systems.

The Proposed Project would include seven new private, on-site fire hydrants along the proposed internal roadway and five new public fire hydrants along South Prairie Avenue. In addition, the Proposed Project would include two public, on-site fire hydrants along the westerly edge of the West Parking Garage Site. No additional fire hydrants are proposed for the East Parking and Hotel Site or the Well Relocation Site as there are existing public hydrants located on West Century Boulevard and West 102nd Street.

The required flow demand of the Proposed Project is 4,000 gpm. According to the LACFD, through the 16 existing public fire hydrants, the five proposed new public fire hydrants, and the

seven proposed private fire hydrants, there would be adequate capacity to meet the estimated fire flow demand of the Proposed Project. Further, fire flow would be in compliance with the requirements of the City's Fire Code and subject to the review and approval of the LACFD. Because the Proposed Project would include fire flows and additional private and public fire hydrants that would meet the requirements of the City's Fire Code and the LACFD, there would be no need for new or physically altered facilities beyond those included in the Proposed Project.

As discussed above, the Hollywood Park Specific Plan Adjusted Baseline development includes existing and proposed public fire hydrants as well as proposed private fire hydrants. The fire flows and location/spacing of the proposed private and public fire hydrants of the Hollywood Park Specific Plan Adjusted Baseline projects would meet the requirements of the City's Fire Code and the LACFD. Thus, operation of the Proposed Project under Adjusted Baseline conditions would not require the need for new or physically altered facilities for the provision of fire protection and emergency medical services, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency medical services. Therefore, the Proposed Project's operational impacts on fire protection, facilities, and emergency medical services would be **less than significant**.

Mitigation Measures

None required.

Cumulative Impacts

The geographic scope of analysis for cumulative impacts related to fire protection and emergency medical services includes those past, present, and reasonably foreseeable cumulative projects located within the LACFD service area, with a focus on the areas served by the same three LACFD fire stations that would primarily serve the Proposed Project (e.g., Fire Station 170, Fire Station 18, and Fire Station 173). As described further below, Fire Stations 170, 18, and 173 would serve a total of 110 cumulative projects, in addition to the Proposed Project. The development of the 110 cumulative projects consists of approximately 6,713 residential units, 1,235,363 sf of commercial uses, 679,683 sf of retail uses, 8,753 sf of restaurant uses, 4,346,866 sf of office uses, 657,704 sf of industrial/warehouse uses, 128,402 sf of hotel uses which would include 1,705 hotel rooms, 64,500 sf of school uses, 1,234,725 sf of miscellaneous uses (i.e., ~~auto service bays, athletic training facility, recreation center, community center, conference center, education center, ice skating rink, civic site, bus facility, and a church~~), and 13 acres of open space.

Impact 3.13-2: Implementation of the Proposed Project, in combination with related cumulative projects, could result in substantial adverse physical impacts associated with the provision of or need for new or physically altered facilities for the provision of fire protection and emergency medical services, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. (Less than Significant)

Construction

Because the LACFD operates under a regional concept in its approach to providing fire protection and emergency medical services, it is conservatively assumed the LACFD would provide either first due-in or back-up services to all 146 cumulative projects included in Table 3.0-2 (see Section 3.0, Introduction to the Analysis). Of these 146 cumulative projects, 110 projects would be located within the LACFD service areas of the same three LACFD fire stations that would primarily serve the Proposed Project (e.g., Fire Station 170, Fire Station 18, and Fire Station 173). **Table 3.13-2**, below, provides the list of those cumulative projects located in the City of Inglewood within the LACFD service area of Fire Stations 170, 18, and 173 and the distances from the cumulative projects to the respective servicing fire stations.

In compliance with the requirements of Cal OSHA and the City's Fire Code, all construction personnel working on cumulative projects would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction vehicles would be maintained within individual project sites of the cumulative projects. Construction of the cumulative projects would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Similar to the Proposed Project, when a building or grading permit is required, ~~construction management plans would be prepared, by the project applicants and approved by the City's Department of Public Works and the LACFD review construction plans and determine appropriate requirements to ensure that construction avoids creating major traffic congestion or adverse effects on adjacent properties.~~ Truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the City prior to construction activities of cumulative development. Construction of the Proposed Project, in combination with the construction of other cumulative development, would not increase demand for fire protection and emergency medical services that could require construction of new or expanded facilities.

There are multiple routes from multiple fire stations to the cumulative development of which LACFD can use in the event of heavy roadway congestion. All road closures and detours should be approved by the LACFD so as not to adversely impact emergency responses.³¹ Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternative routes, and multiple emergency vehicle response. According to the LACFD, there are no planned

³¹ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, *letter correspondence* dated January 24, 2019.

improvements to fire stations in the immediate area of the Project Site or Project area.³² The LACFD dispatches multiple units from multiple fire stations in the event of a large fire. An acceptable equipment level is maintained throughout the Department’s jurisdictional boundaries to enable the appropriate response to all incidents.³³ Because the related cumulative projects would not exacerbate the effect of the Proposed Project, the Proposed Project’s contribution to a significant cumulative impact would not be considerable, and therefore, impacts would be **less than significant**.

Operations

As discussed above, the LACFD provides services to a population of over four million residents living and working in 59 cities and all unincorporated communities within Los Angeles County. It is conservatively assumed the LACFD would provide either first due-in or back-up services to all 146 cumulative projects. Of these 146 cumulative projects, 110 projects are located within the service areas of the same three LACFD fire stations that would be the primary responders to emergencies at the Proposed Project (e.g., Fire Station 170, Fire Station 18, and Fire Station 173); refer to Table 3.13-2.

Fire Station 170 would provide fire protection and emergency medical services to 59 cumulative projects; Fire Station 18 would provide service 78 cumulative projects; and Fire Station 173 would service 72 cumulative projects. Operation of the Proposed Project, along with the operations of past, present, and reasonably foreseeable future projects, including the HPSP Adjusted Baseline projects and projects on the cumulative list, would increase the demand for fire protection and emergency medical services.

**TABLE 3.13-2
 CUMULATIVE PROJECTS WITHIN THE LACFD SERVICE AREA OF FIRE STATIONS 170, 18, AND 173**

Cumulative Project Number	Location	Jurisdiction	Project Development Characteristics	LACFD Fire Station Providing Service ^a (Distance in miles from LACFD Fire Station)
5	888, 892, and 898 N. Sepulveda Boulevard	El Segundo	190-room hotel	FS 18 (2.4)
9	400 Duley Road	El Segundo	73,000 sf office	FS 18 (2.0)
10	2275 Mariposa Avenue	El Segundo	52,000 sf corporate office, 68,300 athletic training facility	FS 18 (1.0)
11	201 N. Douglas	El Segundo	High school (-90,000 sf) (1,200 students)	FS 18 (2.1)
12	2125 Campus Drive	El Segundo	121,450 sf hotel, 63,550 sf office	FS 18 (2.0)
14	1700 E. Imperial Avenue	El Segundo	96,898 sf office	FS 18 (2.5)
15	710 N. Nash Street	El Segundo	611,545 sf office, 13,660 sf retail	FS 18 (2.0)

³² Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, *letter correspondence* dated October 25, 2018.

³³ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, *letter correspondence* dated January 24, 2019.

TABLE 3.13-2
CUMULATIVE PROJECTS WITHIN THE LACFD SERVICE AREA OF FIRE STATIONS 170, 18, AND 173

Cumulative Project Number	Location	Jurisdiction	Project Development Characteristics	LACFD Fire Station Providing Service ^a (Distance in miles from LACFD Fire Station)
17	445 N. Douglas Street	El Segundo	106,000 sf office, 117,000 sf warehouse industrial data center	FS 18 (2.0)
19	444 N. Nash Street	El Segundo	180,422 sf data center	FS 18 (2.1)
20	SE Aviation Boulevard	El Segundo	525 condominiums, -835,000 sf office	FS 18 (2.5)
25	525 N. Sepulveda Boulevard	El Segundo	6,952 sf hotel expansion	FS 18 (2.6)
26	900, 950 Sepulveda Boulevard	El Segundo	20,819 sf warehouse, 139,558 sf office, 14,025 sf manufacturing	FS 18 (2.4)
27	600-630 N. Sepulveda Boulevard	El Segundo	3,714 sf fast food restaurant with drive-through	FS 18 (2.5)
28	2130 E. Maple Avenue	El Segundo	20,955 sf office	FS 18 (2.1)
29	555 N. Nash Street	El Segundo	17,315 sf ice skating rink	FS 18 (2.2)
30	14321 Van Ness Avenue	Gardena	40 townhomes	FS 170 (2.6)
31	1720 West 135 th Street	Gardena	100,438 sf industrial	FS 170 (2.4)
32	13919 Normandie Avenue	Gardena	20 dwelling units	FS 170 (2.7)
34	Aviation Boulevard/El Segundo Boulevard	Hawthorne	610 condominiums	FS 18 (2.0)
35	4500 West 116 th Street	Hawthorne	116 condominiums	FS 18 (0.6), FS 170 (1.7), FS 173 (2.4)
36	13806 Hawthorne Boulevard	Hawthorne	171 apartments, 32,500 sf office	FS 18 (2.2), FS 170 (2.6)
37	Crenshaw Boulevard/ Jack Northrop Avenue	Hawthorne	230 dwelling units	FS 18 (2.1), FS 170 (1.3), FS 2.5)
38	14000 Yukon Avenue	Hawthorne	6 apartments	FS 18 (2.6), FS 170 (2.4)
39	4427 El Segundo Boulevard	Hawthorne	350-room hotel	FS 18 (1.5), FS 170 (2.1)
40	11519 Acacia Avenue	Hawthorne	119-room hotel	FS 18 (0.6), FS 170 (1.6), FS 173 (2.3)
41	14135 Cersie Avenue	Hawthorne	241 apartments	FS 170 (2.5), FS 18 (2.8)
42	664 E. Manchester Terrace	Inglewood	4 condominiums	FS 173 (1.1), FS 18 (1.8), FS 170 (1.9)
43	844 N. Centinela Avenue	Inglewood	4 apartments	FS 173 (2.1)
44	501 E. 99th Street	Inglewood	12 condominiums	FS 18 (0.7), FS 170 (1.4), FS 173 (1.4)
45	921 N. Edgewood Street	Inglewood	38 apartments	FS 173 (2.1)
46	222 W. Spruce Avenue	Inglewood	10 apartments	FS 18 (1.2), FS 173 (1.8), FS 170 (2.2)

**TABLE 3.13-2
 CUMULATIVE PROJECTS WITHIN THE LACFD SERVICE AREA OF FIRE STATIONS 170, 18, AND 173**

Cumulative Project Number	Location	Jurisdiction	Project Development Characteristics	LACFD Fire Station Providing Service ^a (Distance in miles from LACFD Fire Station)
47	961 E. 68th Street	Inglewood	3 condominiums	FS 173 (1.5)
48	417 N. Market Street	Inglewood	12 condominiums	FS 173 (1.8), FS 18 (2.1)
49	819 E. La Palma Drive	Inglewood	5 apartments	FS 18 (1.3), FS 173 (1.3), FS 170 (1.8)
50	814 N. Market Street	Inglewood	18 bed congregate living facility	FS 173 (2.1), FS 18 (2.5)
51	411 E. Hazel Street	Inglewood	18 apartments	FS 173 (1.8), FS 18 (2.4)
52	329 E. Hazel Street	Inglewood	4 condominiums	FS 173 (1.8), FS 18 (2.3)
53	11111 S. Prairie Avenue	Inglewood	120-room hotel	FS 18 (1.0), FS 173 (1.1), FS 170 (1.2)
54	3920 W. 108th Street	Inglewood	3 apartments	FS 18 (0.8), FS 170 (0.9), FS 173 (1.5)
55	125 E. Spruce Avenue	Inglewood	7 apartments	FS 18 (1.2), FS 173 (1.6), FS 170 (2.0)
56	704 N. Market Street	Inglewood	12 apartments	FS 173 (2.0), FS 18 (2.4)
57	408 E. Warren Lane	Inglewood	2,542 sf commercial	FS 173 (1.7), FS 18 (2.3)
58	508 S. Eucalyptus Avenue	Inglewood	40-unit senior affordable housing development	FS 18 (1.3), FS 173 (1.9), FS 170 (2.3)
59	417-433 Centinela Avenue	Inglewood	116 apartments	FS 173 (1.7), FS 18 (2.4)
60	721 N. La Brea Avenue	Inglewood	1,312 sf commercial, -1,210 sf commercial	FS 173 (2.1), FS 18 (2.4),
61	101, 125, 139, 140, 150 Market Street	Inglewood	40,000 sf retail	FS 18 (1.7), FS 173 (1.5), FS 170 (2.2)
62	113-133 Plymouth Street	Inglewood	20 townhomes	FS 173 (2.3), FS 18 (2.5)
63	333 N. Prairie Avenue	Inglewood	310 townhomes	FS 173 (1.3), FS 18 (2.1), FS 170 (2.2)
64	705-715 N. Centinela Avenue	Inglewood	81,613 sf self-storage	FS 173 (2.0), FS 18 (2.5)
65	3660 W. 107th Street	Inglewood	3 dwelling units	FS 170 (0.6), FS 18 (1.1), FS 173 (1.3)
66	614 E. Hyde Park Boulevard	Inglewood	18-bed congregate living facility	FS 173 (1.8)
67 ^b	1050 S. Prairie Avenue	Inglewood	371,923 sf retail; 3,567,314 sf office; 2,186 residential units; 300-room hotel; 13.06 acres open space/park; and 4 acres of civic site.	FS 173 (1.0), FS 18 (1.1), FS 170 (1.3)
68	D3 Site (La Brea Avenue/Florence Avenue)	Inglewood	243 apartments, 40,000 sf retail	FS 173 (1.7), FS 18 (1.8), FS 170 (2.4)
69	101 S. La Brea	Inglewood	Philharmonic Association 25,500 sf	FS 173 (1.6), FS 18 (1.7), FS 170 (2.3)
70	316 Hardy Street	Inglewood	5 condominiums	FS 18 (0.8), FS 173 (2.0), FS 170 (2.0)

**TABLE 3.13-2
 CUMULATIVE PROJECTS WITHIN THE LACFD SERVICE AREA OF FIRE STATIONS 170, 18, AND 173**

Cumulative Project Number	Location	Jurisdiction	Project Development Characteristics	LACFD Fire Station Providing Service ^a (Distance in miles from LACFD Fire Station)
71	943-959 W. Hyde Park Boulevard	Inglewood	159,498 sf 5-story self-storage facility	FS 173 (1.8)
72	8911 Aviation Boulevard	Inglewood	173,804 sf car rental	FS 18 (1.8)
73	3900 W. Century Boulevard	Inglewood	4 hotel rooms ^f	FS 18 (0.9), FS 170 (1.0), FS 173 (1.2)
74	5206 W. Thornburn Street	Los Angeles	Elementary to Middle Private School (50 Students)	FS 18 (2.3), FS 173 (2.7)
75	9800 S. Sepulveda Boulevard	Los Angeles	178-room hotel	FS 18 (2.4),
76	10701 S. La Cienega Boulevard	Los Angeles	1,006,236 sf bus facility	FS 18 (0.8), FS 170 (2.5),
77	7407 S. La Tijera Boulevard	Los Angeles	140 apartments, 2,600 sf retail	FS 18 (2.6)
78	8740 S. La Tijera Boulevard	Los Angeles	137 apartments	FS 18 (2.6)
79	8521 S. Sepulveda Boulevard	Los Angeles	3,399 sf fast food restaurant with drive-through	FS 18 (2.8)
81	1 World Way	Los Angeles	Land Access Modernization Program	FS 18 (2.5)
82	8721 S. Broadway	Los Angeles	108-unit senior housing, 4,000 sf retail	FS 173 (2.8), FS 170 (3.1)
83	5975 S. Western Avenue	Los Angeles	225,000 sf industrial	FS 173 (2.3)
84	1636 W. Manchester Avenue	Los Angeles	68,250 sf office	FS 173 (1.2), FS 170 (1.9)
85	8540 S. La Tijera Boulevard	Los Angeles	Middle School (525 students)	FS 18 (2.5)
86	8705 S. Western Avenue	Los Angeles	Middle School (616 students)	FS 173 (1.0), FS 170 (1.7)
87	8400 S. Vermont Avenue	Los Angeles	740,000 sf shopping center	FS 173 (2.1), FS 170 (2.6)
88	9402 S. Broadway	Los Angeles	49-unit senior housing	FS 173 (2.8), FS 170 (2.9)
89	8415 S. Hoover Street	Los Angeles	142 condominiums, 57 apartments, 11,550 sf recreational center, 7,500 sf retail, 1,500 sf bank, 15,400 sf office	FS 173 (2.8), FS 170 (2.9)
90	5816 S. Western Avenue	Los Angeles	4 fueling positions, 1,835 sf convenience store	FS 173 (2.5)
91	505 W. Century Boulevard	Los Angeles	6 fueling positions	FS 170 (2.6), FS 173 (2.6)
95	6855 S. La Cienega Boulevard	Los Angeles	22,590 sf supermarket	FS 18 (2.7), FS 173 (2.9)
96	11604 Aviation Boulevard	Los Angeles	281 condominiums, 26,500 sf retail/commercial, 112 apartments	FS 18 (1.4)

TABLE 3.13-2
CUMULATIVE PROJECTS WITHIN THE LACFD SERVICE AREA OF FIRE STATIONS 170, 18, AND 173

Cumulative Project Number	Location	Jurisdiction	Project Development Characteristics	LACFD Fire Station Providing Service ^a (Distance in miles from LACFD Fire Station)
97	1248 W. 105 th Street	Los Angeles	74 apartments	FS 170 (1.7), FS 173 (2.0)
98	3816 W. 54 th Street	Los Angeles	1,196 sf office expansions	FS 173 (2.7)
99	1252 W. 105 th Street	Los Angeles	74 apartments	FS 170 (1.7), FS 173 (2.0)
100	11814 Aviation Boulevard	Los Angeles	128-room hotel	FS 18 (1.5)
101	11034 S. Western Avenue	Los Angeles	4,983 sf laundromat	FS 18 (1.5)
103	12000 S. Western Avenue	Los Angeles	44-room hotel	FS 170 (1.4), FS 173 (2.4), FS 18 (2.9)
104	1743 Imperial Highway	Los Angeles	39 apartments	FS 170 (1.2), FS 173 (2.0), FS 18 (2.8)
105	10601 S. Vermont Street	Los Angeles	4,500 laundromat	FS 170 (2.0), FS 173 (2.6)
106	1423 W. 120 th Street	Los Angeles	57 condominiums	FS 170 (1.8), FS 173 (2.6)
107	1509 W. 102 nd Street	Los Angeles	12 apartments	FS 18 (3.1), FS 170 (1.4), FS 173 (1.6)
108	1539 102 nd Street	Los Angeles	10 apartments	FS 170 (1.4), FS 173 (1.5), FS 18 (3.0)
109	10501 S. Buford Avenue	Los Angeles	11 townhomes	FS 18 (0.5), FS 170 (2.1), FS 173 (2.3)
110	11824 Aviation Boulevard	Los Angeles	36 apartments	FS 18 (1.5)
111	10505 Hawthorne Boulevard	Los Angeles	32 apartments	FS 18 (0.2), FS 170 (1.5), FS 173 (1.8)
112	10609 S. Inglewood Avenue	Los Angeles	9 apartments	FS 18 (0.4), FS 170 (2.0), FS 173 (2.3)
113	10907 S. Inglewood Avenue	Los Angeles	4 apartments	FS 18 (0.3), FS 170 (2.0), FS 173 (2.4)
114	8910 S. Normandie Avenue	Los Angeles	6 apartments	FS 173 (1.5), FS 170 (2.0)
115	10136 Felton Avenue	Los Angeles	19 apartments	FS 18 (0.7), FS 170 (2.3), FS 173 (2.4)
116	5053 E. 109 Street	Los Angeles	17 condominiums	FS 18 (0.7), FS 170 (2.3)
117	9223 S. Vermont Avenue	Los Angeles	2,858 sf auto repair	FS 173 (2.0), FS 170 (2.)
118	5301 W. Centinela Avenue	Los Angeles	1,640 sf restaurant	FS 18 (2.9), FS 173 (3.0)
119	3838 W. Slauson Avenue	Los Angeles	1,060 sf convenience store	FS 173 (2.4)
121	1240 W. 105 th Street	Los Angeles	42 apartments	FS 170 (1.7), FS 173 (2.0), FS 18 (3.3)
122	6109 Overhill Drive	Los Angeles	2 duplex units	FS 173 (2.6)

**TABLE 3.13-2
 CUMULATIVE PROJECTS WITHIN THE LACFD SERVICE AREA OF FIRE STATIONS 170, 18, AND 173**

Cumulative Project Number	Location	Jurisdiction	Project Development Characteristics	LACFD Fire Station Providing Service ^a (Distance in miles from LACFD Fire Station)
123	1034 W. 109 th Place	Los Angeles	9 apartments	FS 170 (1.9), FS 173 (2.4)
124	11408-11412 S. New Hampshire Avenue	Los Angeles	2,900 sf gas station with convenience store	FS 170 (2.0), FS 173 (2.6)
125	10335 S. Vermont Avenue	Los Angeles	1,342 sf church	FS 170 (2.0), FS 173 (2.2)
126	10401 S. Vermont Avenue	Los Angeles	250 sf commercial, 1 apartment	FS 170 (2.0), FS 173 (2.2)
127	1023 W. 107 th Street	Los Angeles	8 apartments	FS 170 (2.0), FS 173 (2.3)
129	Bounded by Century Boulevard, La Cienega Boulevard, Arbor Vitae Street, and Vicksburg Avenue	Los Angeles	300,000 sf office, 400-room hotel, 200,000 sf retail, 100,000 conference center	FS 18 (1.1), FS 170 (2.6)
138	6100 S. Hoover Street	Los Angeles	2,328 sf self-service car wash	FS 173 (3.0)
141	1743 Imperial Highway	Los Angeles County	39 apartments	FS 18 (2.8), FS 170 (1.2), FS 173 (2.0)
142	12000 S. Western Avenue	Los Angeles County	44-room hotel	FS 170 (1.4), FS 173 (2.4), FS 18 (2.9)

NOTES:
 FS = fire station;
^a Fire stations located within 2.5 miles of the cumulative project were included.
^b Portion of the HPSP not included within the Adjusted Baseline.

SOURCE: County of Los Angeles Fire Department Website, *Fire Station Locator*, Available at: <https://locator.lacounty.gov/fire>, Accessed November 2018; ESA.

Although the cumulative demand on LACFD services would increase, cumulative impacts on fire protection and emergency medical services would be less than significant because each cumulative project would be required to comply with the City and State Fire Codes and LAFCD design review, and include site-specific design and safety features. It is reasonable to assume such compliance because these codes are fully enforced through the City of Inglewood’s and other local communities plan check and building inspection functions. Each cumulative project would be subject to the required review by the LACFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety. Implementation of the Fire Code and Building Code requirements, along with any other LAFCD requirements, combined with the LAFCD’s regional multiple fire station response, the requirement that each cumulative project within the LACFD service area, including the Proposed Project and the HPSP Adjusted Baseline projects, would be required to comply with regulatory requirements related to fire protection and emergency medical services would reduce potential impacts to fire protection and emergency services.

As discussed above for the Proposed Project, the LACFD has ~~no known or proposed plans~~ ~~to indicate that it does not anticipate the need to~~ expand fire or emergency response facilities within the project vicinity, even in consideration of cumulative development within the LACFD service area.³⁴ The LACFD's 2017-2021 Strategic Plan is designed to address short and long term challenges and to carry out the County's public safety mission in meeting the current and future needs. Similar to the Proposed Project, cumulative projects would generate revenue (e.g., developer fees, property and sales tax revenue) that could be used to offset LACFD expenditures necessary to meet increased demand for fire protection and emergency medical services consistent with its Strategic Plan.

Based on the above considerations, the Proposed Project, in conjunction with the HPSP Adjusted Baseline projects and other cumulative development within the LAFCD service area, would not result in the need for the construction of new, or expanded fire facilities in order to maintain acceptable service ratios, response times or other performance objectives. Therefore, the cumulative impact would be **less than significant**.

Mitigation Measures

None required.

Police Protection

3.13.5 Environmental Setting

Regional and Local Setting

Police protection for the City, including the Project Site, is provided by the Inglewood PD, which serves the entire population of the City (estimated at 110,598 persons in 2017).³⁵ The Police Department employs 191 sworn personnel and 92 civilian support personnel. Of the 191 sworn personnel, approximately 56 officers are available in the field throughout the day and another 35 officers are available from the Inglewood Police Station.³⁶ The Inglewood PD also has the ability to call upon mutual assistance from surrounding law enforcement agencies.³⁷ The Inglewood PD operates from a single police station (the Inglewood Police Station) located at 1 West Manchester Boulevard, approximately 1.5 miles northwest of the Project Site. The location of the Inglewood Police Station is shown on Figure 3.13-1.

The Inglewood PD is comprised of multiple resources and special service teams including the special weapons and tactics (SWAT) team, specialty trained canine teams including vapor wake dogs, the crisis negotiation team, the special enforcement team, directed enforcement units, the

³⁴ [REDACTED]

³⁵ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

³⁶ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

³⁷ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

narcotics unit, scientific service investigators, traffic division, bike teams, community affairs, and fiscal services and recruitment. All of these units have assigned emergency vehicles to them for immediate response capabilities.^{38,39}

The Inglewood PD provides traffic control for all large-scale events within the City. Specifically, the Inglewood PD coordinates with Serco, a private traffic control company, to provide traffic control for all large-scale events at The Forum. For all large-scale public and private events at the new NFL Stadium the Inglewood PD will have specific responsibilities for traffic control that will be outlined in a Transportation Management and Operations Plan (TMOP), currently under development by the City.⁴⁰

The Inglewood PD consists of four bureaus: the administrative services bureau, the support services bureau, the detective bureau, and the patrol bureau. The administrative services bureau is the support branch of the Inglewood PD tasked with operating the administrative services, the background unit, grants, fiscal services, the training unit, personnel/recruitment, and the records division. The support services bureau consists of vice/intelligence, emergency services, property, narcotics, policy, and training. The detective bureau includes two divisions, crimes against property and crimes against persons. The detective bureau includes economic crimes, burglary/theft, missing persons, digital forensic, crime analysis, and court liaison. The patrol bureau includes the communications division, the K-9 unit, traffic control, and parking enforcement.⁴¹

The Inglewood PD includes four geographic patrol beats.⁴² The Project Site is located within portions of both Beat 2 and reporting district (RD) 25 and Beat 4 and RD 30. Beat 2 consists of the portion of Inglewood north of West 104th Street and west of South Prairie and Beat 4 consists of the portion of Inglewood south of West Century Boulevard and east of South Prairie Avenue.^{43,44}

The Police Department provides a 24-hour telephone service to the public for information and for routine or emergency assistance. The Inglewood PD uses two-way radio capability, for official use only, which provides continuous communication between the dispatchers and Police Department members in the field.⁴⁵ According to the Inglewood PD, the current average response time citywide is 5 minutes and 12 seconds for emergency calls. A service call is considered an emergency call when there is an immediate or potential threat to life or the infliction of serious

³⁸ City of Inglewood Police Department, *About the Police Department*, Available at: <https://www.cityofinglewood.org/658/About-the-Police-Department>. Accessed August 2018.

³⁹ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

⁴⁰ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

⁴¹ City of Inglewood Police Department, *Divisions*, Available at: <https://www.cityofinglewood.org/540/Divisions>. Accessed August 2018.

⁴² City of Inglewood Police Department, *2007 Beat Map*, dated February 6, 2007, <https://www.cityofinglewood.org/DocumentCenter/View/1074/Beat-Map-PDF?bidId=>. Accessed August 2018.

⁴³ City of Inglewood Police Department, *Beat 4 Map*, dated February 21, 2007, <https://www.cityofinglewood.org/DocumentCenter/View/1073/Beat-4-Map-PDF?bidId=>. Accessed August 2018.

⁴⁴ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

⁴⁵ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

injury. A service call is considered a non-emergency call when it involves a crime against property or other types of crimes that do not meet the criterion for emergency. The Inglewood PD’s goal is to maintain or improve upon the 5 minutes and 12 seconds response time for emergencies for the City of Inglewood as a whole.^{46,47}

Table 3.13-3, below, presents the types and number of crimes reported in the City of Inglewood for 2017 (the latest whole year for which detailed annual crime data is available). As shown, a total of 7,140 crimes were reported in the City, with the crimes most prevalent crimes being property crimes and larceny (theft). In 2018 the City of Inglewood experienced a 2.9 percent decrease in crimes compared to 2017, including an 8 percent decrease in violent crimes. Within the immediate area surrounding the Project Site,⁴⁸ the Inglewood PD reports a 7 percent decrease in crimes from 2017 to 2018.⁴⁹

**TABLE 3.13-3
 INGLEWOOD POLICE DEPARTMENT ANNUAL CRIME STATISTICS (2017)^a**

Crime	Number	Percent of Inglewood Crime
Violent Crimes	791	11%
Homicide	13	0%
Rape	45	1%
Robbery	390	5%
Aggravated Assault	343	5%
Property Crimes	2,779	39%
Burglary	492	7%
Larceny (Theft)	1,469	21%
Auto Theft	802	11%
Arson	16	0%
Total	7,140	100%

NOTE:

^a Crime data for 2017 (the latest whole year for which annual crime data was available).

SOURCE: City of Inglewood Police Department, *Annual Crime Statistics 1978-2017*, <https://www.cityofinglewood.org/DocumentCenter/View/11887/PD-Crime-Stats-2017>, revised July 3, 2018, accessed August 2018.

The Los Angeles County Sheriff’s Department (LASD) and the 47 local police departments within Los Angeles County provide each other mutual aid in the event of a major unplanned event which impacts law enforcement resources. To best utilize mutual aid resources, Los Angeles County is divided into eight geographic areas “A” through “H” which are currently based on disaster management area configurations which were redefined in the mid-1990s. LASD

⁴⁶ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

⁴⁷ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

⁴⁸ Per the letter correspondence from Inglewood PD dated January 10, 2019, the Project Area is described as being located on West Century Boulevard to the north, 355 feet east of South Doty Avenue on the east, 462 feet west of South Prairie Avenue on the west and West 103rd Street on the south between South Prairie Avenue and South Doty Avenue.

⁴⁹ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

maintains “contact” stations within each disaster management area. These contact stations are typically the nearest located station to a particular local police department. The Inglewood PD is located in Area “G” and the following local law enforcement agencies would provide immediate assistance to the Inglewood PD: El Camino College PD, El Segundo PD, Gardena PD, Hawthorne PD, Hermosa Beach PD, Manhattan Beach PD, Palos Verdes Estates PD, Redondo Beach PD, Torrance PD, and California Highway Patrol (CHP) West LA. The LASD contact station would be LASD-South LA station.⁵⁰

3.13.6 Adjusted Baseline Environmental Setting

As described in Chapter 3.0, Section 3.0.5, Section 3.13, Public Services, assumes the Adjusted Baseline Environmental Setting. Related to Police Protection, the changes associated with the HPSP Adjusted Baseline development include construction of an Inglewood PD substation to be located inside one of the HPSP parking structures. The substation will be equipped with offices, an interview room, and work area for use by Inglewood PD officers and personnel. No other changes from the existing setting for Police Protection are anticipated under the Adjusted Baseline.

3.13.7 Regulatory Setting

Federal

There are no federal regulations, plans, or policies applicable to police protection relevant to the Proposed Project.

State

There are no state regulations, plans, or policies applicable to police protection relevant to the Proposed Project.

Local

City of Inglewood General Plan

The following goals and objectives from the City of Inglewood General Plan Land Use Element and the Safety Element are applicable to the Proposed Project:

Land Use Element

Goal: Maintain the present high level of police and fire services to the extent it is fiscally prudent.

Safety Element

Goal 6: Public safety personnel provide improved response and services to the community.

Policy: Provide sufficient manpower and equipment to respond adequately to fire emergencies and civil disturbances.

⁵⁰ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

As further discussed below in Impact 3.13-3, due to the Project Site's close proximity to the Inglewood Police Station, approximately 1.5 miles northwest of the Project Site, emergency responses are not expected to be substantially affected. Further, the Proposed Project would generate revenue for the City's general fund that could be used to fund Inglewood PD expenditures as necessary to offset any incremental Project impact on police services. It is the opinion of City staff that the Proposed Project has no potential inconsistencies with the above-referenced goals and policies of the City of Inglewood General Plan Land Use and Safety Elements. Ultimately, it is within the authority of the City Council to determine if the Proposed Project is consistent with the City of Inglewood General Plan.

3.13.8 Analysis, Impacts and Mitigation

Significance Criteria

The City has not adopted thresholds of significance for analysis of impacts to police protection. The following thresholds of significance have been adapted from CEQA Guidelines section 15065 and CEQA Guidelines Appendix G. A significant impact would occur if the Proposed Project would:

1. Result in substantial adverse physical impacts associated with the provision of or need for new or physically altered facilities for police protection services, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.

Consistent with the requirements of CEQA as articulated in the California First District Court of Appeal decision in *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833,⁵¹ significant impacts under CEQA involve adverse physical changes in the environment as a result of implementation of a project. Pursuant to this case, "the city has a constitutional obligation to provide adequate fire protection services," and potential effects on public safety services are not in and of themselves an environmental impact that CEQA requires a project applicant to mitigate. The Court stated that "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city." (Cal. Const., art. XIII, § 35, subd. (a)(2) ["The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services."].) Although the case focused on fire protection and emergency medical services, its reasoning applies to police protection services. Thus, the focus of analysis in this section is not on whether the Proposed Project would result in the need for additional police protection, per se, but rather is on the question of whether provision of any required resources (e.g., construction of a new police station) would result in significant physical adverse impacts on the environment.

⁵¹ Court of Appeal of the State of California, First Appellate District, Division Three, Filed 11/30/2015, 15; *City of Hayward v. Board of Trustees* (Alameda County Superior Court No. RG09480852); *Hayward Planning Association et al., v. Board of Trustees of the California State University*, November 30, 2015 <http://law.justia.com/cases/california/court-of-appeal/2015//a131412a.html>, accessed October 2018.

Methodology and Assumptions

Police protection needs relate to the size of the population and geographic area served, the number and types of calls for service, and the physical characteristics of the City. Changes in these factors resulting from construction and operation of the Proposed Project may increase the demand for police protection services. The Inglewood PD evaluates the demand for police protection on a project-by-project basis, including review of a project's security and/or design features, to determine if a project would require additional equipment, personnel, new facilities, or alterations to existing facilities.

The Inglewood PD was consulted for this analysis and the responses provided regarding the Proposed Project were incorporated. According to the Inglewood PD, the Police Department does not maintain service ratios such as an officer-to-resident ratio. The Inglewood PD is a data driven law enforcement agency and deploys according to the study of crime and crime trends.⁵² The Police Department does not currently have a strategic plan or long-term master plan. Due to the rapidly evolving and expanding of the entertainment segment of the City, the planning process for the Inglewood PD is ongoing. The Inglewood PD remains engaged with the City's CEQA consultants in regards to traffic forecasting and analysis processes.⁵³ Correspondence with the Inglewood PD is contained in the Draft EIR Appendix X.

Based on this information and in consultation with the Inglewood PD, a determination was made as to whether the Inglewood PD would require new or physically altered facilities for the provision of police protection in order to maintain acceptable response times or other performance objectives for police protection services. If such facilities would be required, the analysis considers whether the Inglewood PD's construction of such facilities would reasonably be expected to cause significant environmental impacts.

Impacts and Mitigation Measures

Impact 3.13-3: Implementation of the Proposed Project could result in substantial adverse physical impacts associated with the provision of or need for new or physically altered facilities for police protection services, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives for police protection. (Less than Significant)

Construction

The Proposed Project could result in increased demand for police protection during project construction phases as a result of theft or vandalism at the construction site, as discussed further below.

Theft or Vandalism of Construction Site

During construction of the Proposed Project, equipment, building materials, vehicles, and temporary offices would be temporarily located on the Project Site. As such, the Project Site, if

⁵² Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

⁵³ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

not properly secured, could be subject to theft or vandalism, potentially requiring Inglewood PD involvement. The Proposed Project would incorporate a number of temporary security measures, including security barriers and fencing, security lighting, and locked entry to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. Regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided to minimize trespassing, vandalism, and short-cut and other attractions. Due to the on-site security measures, construction of the Proposed Project would not result in an increased demand for police protection that could require the construction or expansion of police facilities.

As discussed above, construction of the Proposed Project would not create a demand for increased police protection services that would result in the need for new or physically altered police protection facilities, in order to maintain acceptable response times, or other performance objectives. Therefore, potential impacts on police protection services due to construction activities would be **less than significant**.

Operation

Operation of the Proposed Project could result in increased demand for police protection as a result of increases in pedestrian activity and population density at the Project Site, as discussed further below.

Demand for Police Protection, Facilities, Equipment, and Officers

Patron, Employee, Customer, and Visitor Effects on Demand

The Proposed Project would result in an increase in the level of activity on the Project Site. The increased population at the Project Site would be comprised of patrons attending games/events; employees of the LA Clippers and/or arena operator; temporary event-related employees; customers and employees of the restaurant, retail, sports medicine clinic, and hotel uses; and visitors to the community uses and outdoor plaza. The increase in pedestrian activity and the number of people in and around the Project Site, as well as the potential increase in vehicle/pedestrian conflicts and accidents before, during and after events at the proposed Arena, would result in periodic increases in demand for police protection from the Inglewood PD compared to baseline conditions.

During non-event periods, the Proposed Project would require typical Inglewood PD police protection services, similar to other entertainment, office, commercial, hotel, and parking uses in the City. The arena operator would provide private security personnel to regularly patrol the buildings and grounds. The 3,000 square-foot command center located within the event level of the Arena Structure would be staffed and provide communication resources seven days per week, 24 hours a day. Additionally, private security personnel and/or security equipment (e.g., security lighting, video surveillance, and security gates/locks) would be provided for the office, commercial, hotel, and parking uses.

During LA Clipper games and other large events at the Arena, an increased level of Inglewood PD police protection personnel would be required on- and/or off-site for patrolling and potential response to incidences associated with the large crowds and increase in pedestrian activity. As it does with The Forum, the City would require the provision of traffic control for large-scale events at the Arena. The Inglewood PD and Public Works Department would determine in advance if additional staff would be required based upon attendance at the Arena during game and large events.⁵⁴ It is anticipated that for games/events at the Arena, typical police responses would be associated with actions such as public intoxication, theft from vehicles, low-level assaults, or ejections from fans from the Arena and any related arrests.

During games and other large events at the Arena, the arena operator would provide private security to assist in on-site crowd management and public safety. The arena operator would coordinate with the Inglewood PD and the City of Inglewood Public Works Department to implement the traffic control measures included in the Event TMP). The arena operator and/or event sponsor would contract with the Inglewood PD to provide traffic control personnel and services on public streets in the City as necessary to facilitate safe movement of, and minimize potential conflicts among pedestrians, bicycles, and vehicles. Further, the Proposed Project would generate revenue (e.g., developer fees, property and sales tax revenue) for the City's general fund that could be used to fund Inglewood PD expenditures as necessary to offset increased demand for police services. Through the use of private security and traffic control personnel, installation of proper security equipment, and implementation of the Event TMP, the Proposed Project would avoid creating new demand for police protection services that could require construction of new facilities.

Street Vacations and Response Routes

Implementation of the Proposed Project would include the vacation of an approximately 800-foot linear section of West 102nd Street between South Prairie Avenue and approximately 335 feet west of South Doty Avenue to be developed with portions of the Arena Structure and related uses. Similarly, implementation of the Proposed Project also would include the vacation of an approximately 300-foot linear section of West 101st Street between South Prairie Avenue and South Freeman Avenue to be developed with a portion of the parking garage within the West Parking Garage Site.

As discussed above, the Inglewood PD goal is to maintain or improve upon the 5 minutes and 12 seconds response time for emergencies for the City of Inglewood as whole, even after the opening of the Proposed Project.⁵⁵ The proposed street vacations could alter police response routes to the Arena Site, the West Parking Garage Site, the East Parking and Hotel Site, and the Well Relocation Site, and/or nearby neighborhoods. Despite the changes to the street network, according to the Inglewood PD, sufficient field resources are maintained in all areas of the City to

⁵⁴ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

⁵⁵ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

respond to calls for services, and the impact to response times, if any, is not expected to be substantial.⁵⁶

Please also see Section 3.14, Impact 3.14-X, for a discussion of effects of the Proposed Project on emergency response.

Project Design

The Proposed Project would include space within the Arena Structure for Inglewood PD personnel to use during games/events for police administrative and operational functions, and could include police-related facilities such as temporary detention. Two main areas proposed for security/command center functions in the Arena Structure would be used prior to, during, and after games/events by the Inglewood PD, LACFD, and/or other private security and emergency medical personnel to coordinate incident response, facilitate communication and surveillance, implement the Event TMP, and deploy traffic control officers.

The Proposed Project would include a 24-hour security camera network throughout the Arena, including concourses, loading and access areas, elevators, common and amenity spaces, and plaza areas, as well as in and around parking garages. All security camera footage would be maintained for at least 30 days, and such footage would be provided to the Inglewood PD, upon request. The Proposed Project landscaping would be designed so as to not impede visibility. Overall, the project safety features within the Arena Structure, including the command center and temporary detention facilities, would help ensure that the increased demand for police service would be met without the construction of new or expanded police protection facilities.

As discussed above, because of current and anticipated construction schedules, the City is reasonably assured that the Hollywood Park Specific Plan Adjusted Baseline development will be built and operational by 2024 when the Proposed Project is expected to be opened. Thus, the consideration of the Proposed Project effects must be viewed assuming construction and operation of the assumed parts of the HPSP, including the Stadium. Based on review of submitted plans and discussions with the Inglewood PD, it is anticipated that the HPSP Adjusted Baseline development would include construction of a police substation that would be used by as a base for police services in the vicinity of the LASED, as well as inclusion of numerous security features similar to those described for the Proposed Project. Input provided by the Inglewood PD indicates that no additional police protection would be necessary to serve both the Proposed Project and the HPSP Adjusted Baseline projects.

As such, under the Adjusted Baseline conditions, it is not anticipated that the Proposed Project would result in a substantial increase in demand for additional police protection services that would exceed the capability of the Inglewood PD such that it would require construction of new police protection facilities.

⁵⁶ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

Overall, as discussed above, while the Proposed Project may result in the need for additional sworn officers and related equipment, it would not require a new or expanded police station or other physical facilities other than those included in the Arena Structure.⁵⁷ Because operation of the Proposed Project would not create a demand for increased police protection services that would result in the need for new or physically altered police protection facilities in order to maintain acceptable response times, or other performance objectives, there is no potential that construction of new facilities for the delivery of police protection services would result in substantial adverse environmental impacts. Therefore, potential impacts related to demand for police protection services due to operation of the Proposed Project would be **less than significant**.

Mitigation Measures

None required.

Cumulative Impacts

The geographic scope of analysis for cumulative impacts related to police protection includes those past, present, and reasonably foreseeable cumulative projects located in the City of Inglewood within area served by the Inglewood PD. This would include Cumulative Projects 42 through 73 as presented in Table 3.0-2, Cumulative Projects (see Chapter 3.0, Section 3.0.5). Projects located in other jurisdictions would be primarily served by their respective city police departments, the LASD, and/or the California Highway Patrol. The LASD and the 47 local police departments within Los Angeles County provide mutual aid in the event of a major unplanned event which would affect the provision of appropriate law enforcement resources.⁵⁸

Impact 3.13-4: Implementation of the Proposed Project, in combination with related cumulative projects, could contribute to cumulative substantial adverse physical impacts associated with the provision of or need for new or physically altered facilities for police protection services, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives for police protection. (Less than Significant)

Construction

The Inglewood PD would provide police protection services to 32 of the 146 cumulative projects which would be constructed within the City of Inglewood and within the service areas of the Inglewood PD. Similar to the Proposed Project, each of the cumulative projects developed in Inglewood, particularly those of a larger nature, would be subject to review by the Inglewood PD on a project-by-project basis to ensure that appropriate temporary security measures are implemented to reduce potential impacts to police protection during construction. As appropriate based on this review and in order to avoid adverse effects on adjacent or nearby properties, the

⁵⁷ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

⁵⁸ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

City's Department of Public Works and the Inglewood PD impose construction management requirements on construction projects.

As a result of project-level review of construction plans for cumulative projects, as well as review of the Proposed Project construction plans, construction of the Proposed Project, in combination with the construction of other cumulative development within the City of Inglewood, would not create a new material demand for police protection that could require construction of new facilities. Therefore, the cumulative impact of construction of the Proposed Project and other reasonably foreseeable cumulative projects in the City of Inglewood would be **less than significant**.

Operation

As described above, of the 146 projects included on the Cumulative Project List, 32 are located within the City of Inglewood and within the service areas of the Inglewood PD. The development of these 32 cumulative projects located within the service area of the Inglewood PD would result in approximately ~~9,5953,055~~ residential units, ~~1,255,9034~~17,559 sf of commercial uses, ~~1,176,197451,923~~ sf of retail uses, ~~17,395~~ square feet of restaurant uses, ~~7,626,6873,567.314~~ sf of office uses, ~~792,437~~ sf of industrial/warehouse uses, ~~2,174424~~ hotel rooms, ~~52,08325,500~~ sf of school uses with capacity up to 6,491 students, ~~2,096,79330,000~~ sf of miscellaneous uses (i.e., auto-service bays, athletic training facility, recreation center, community center, conference center, education center, ice skating rink, civic site, bus facility, and a church), and ~~16-13~~ acres of open space. Operation of the Proposed Project, along with the operations of past, present, and reasonable future projects, would increase the demand for police protection.

It is expected that plans for all cumulative projects proposed in the City of Inglewood would be subject to review by the Inglewood PD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the cumulative projects would also be expected to provide on-site security, personnel and/or design features for their residents and patrons per standard development practices for the given uses.

The Inglewood PD has indicated that it does not plan for staffing, equipment, or facilities based on any specific population-based or demographic standard. Rather, it undertakes analysis of crime activity and statistics in the City and allocates resources in response. The Inglewood PD has confirmed that it maintains sufficient field resources in all areas of the City to respond to calls for services anticipated in the future with the Proposed Project and cumulative development.⁵⁹ Police services are typically funded through the City's General Fund. Cumulative projects would generate revenue through developer fees and property and sales tax revenue, for example, that could provide revenue to the City's General Fund which could be used at the City's discretion to augment police resources as determined necessary by the Inglewood PD. Further, the Inglewood

⁵⁹ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

PD has indicated that new or expanded facilities would be not necessary to meet cumulative demand.⁶⁰

Based on the above considerations, the Proposed Project, in conjunction with the HPSP Adjusted Baseline development and other cumulative development within the Inglewood PD service area, would not result in need for the construction of new or expanded police facilities in order to maintain acceptable response times or other performance objectives. Therefore, the cumulative impact would be **less than significant**.

Mitigation Measures

None required.

Parks and Recreational Services

3.13.9 Environmental Setting

Regional and Local Setting

Park and recreational services and facilities in the City are managed by the City of Inglewood Parks Department. The Parks Department manages approximately 89.6 acres of parkland with 11 recreation and open space areas which include: Ashwood Park, Center Park, Centinela Adobe Park, Circle Park, Darby Park, Edward Vincent Park, Grevillea Park, North Park, Queen Park, Rogers Park, and Siminski Park. Facilities include 8 softball fields, 7 basketball courts, 1 volleyball court, 8 play fields, 18 tennis courts, 16 playgrounds, 12 picnic areas, 2 skate parks, and 8 community/cultural centers.⁶¹

As discussed below, the 1995 Open Space Element is the most recently adopted Open Space Element by the City, and it provides that as a minimum threshold, the City ~~should have~~ has a goal of park/population ratio of one acre of parkland per 1,000 residents.⁶² This threshold is used to determine the Project's impacts on parks ~~or and~~ recreational services.⁶³ The City's existing ratio is 0.8 1 acres of parkland per 1,000 residents.⁶⁴ Thus, the City currently does not meet its goal for park and recreation facilities. The Project Site is located within South Inglewood (District 4), which is considered "park poor."⁶⁵ Center Park, which is classified as a neighborhood

⁶⁰ Mark Frontierotta, Chief of Police, letter correspondence dated January 10, 2019, [REDACTED]

⁶¹ City of Inglewood, *Facilities*, Available at: <https://www.cityofinglewood.org/Facilities>, accessed August 2018.

⁶² City of Inglewood, *1995 City of Inglewood General Plan, Open Space Element, page 7*, Adopted December 1995, <https://www.cityofinglewood.org/DocumentCenter/View/131/Open-Space-Element>, accessed August 2018.

⁶³ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.

⁶⁴ Per the United States Census ([HYPERLINK "https://www.census.gov/quickfacts/inglewoodcitycalifornia"], accessed January 2019), the City of Inglewood population as of July 1, 2017 was 110,598 persons. 110,598 persons/1,000 = 110.598. 89.6 acres of existing parkland/110.598 = 0.8 acres of parkland per 1,000 persons.

⁶⁵ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.

park, is the only park located within District 4 and does not fully address the needs of the community. See Table 3.13-4 for quantification of the current parkland per 1,000 residents in the City of Inglewood and in the South Inglewood subarea.

**TABLE 3.13-4
 IBEC PARKLAND ANALYSIS**

	City of Inglewood			South Inglewood		
	Population	Park Acres	Ratio Parks/ 1,000 Residents	Population	Park Acres	Parks/1,000 Residents Ratio
Existing (2017)	110,598	89.60	0.81	6,510	1.8	0.28
Adjusted Baseline Dev't	933	11.89	12.74	933	11.89	12.74
Adjusted Baseline Subtotal	111,531	101.49	0.91	7,443	13.69	1.84
Cumulative Projects	9,073	13.07	1.44	6,510	13.07	2.01
Cumulative Total	120,604	114.56	0.95	13,953	26.76	1.92

SOURCE: ESA, 2019.

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The nearest park to the south of the Project Site is Center Park, located at 3660 West 111 Street, approximately one mile southeast of the Project Site. Center Park is approximately 1.8 acres in size and includes two playgrounds, an open space play area, two gazebos, and one restroom. This neighborhood park is heavily used primarily by families and elementary school-aged children living nearby, or children who attend the Worthington Elementary School adjacent to the park. ~~However, Center Park does not fully address the needs of the community.~~ The park is classified as a neighborhood park, and is the only park located within South Inglewood (District 4). ~~District 4 is considered "park poor."~~⁶⁶ Center Park had a grand-reopening in April 2018. The recent renovation of Center Park included the acquisition of 0.6 acres from the IUSD. There are no further plans for expansion of Center Park at this time. Any future expansion of the park would require acquisition of abutting residential properties and/or the neighboring elementary school which, through a joint use agreement, currently utilizes the park site as a school playground.⁶⁷

~~Accounting for Center Park, South Inglewood has a parkland per 1,000 resident ratio of 0.28 and is considered "park poor."~~⁶⁸

3.13.10 Adjusted Baseline Environmental Setting

As discussed in Chapter 3.0, Section 3.0.5, Section 3.13, Public Services assumed the Adjusted Baseline. Environmental Setting. Accordingly, the changes to parks or recreational services

⁶⁶ ~~Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.~~

⁶⁷ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.

⁶⁸ ~~Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.~~

associated with these developments within the Hollywood Park Specific Plan area are considered as part of the Adjusted Baseline Environmental Setting. Under the Adjusted Baseline, Lake Park will be located within the Hollywood Park Specific Plan area approximately 0.20-25 miles north of the Project Site (see **Figure 3.13-2**). Lake Park will be approximately 11.89 acres in size and will be the central public open space area of the HPSP. Lake Park will provide multi-use programming, shade structures, a restroom, terrace seating along the lake edge, barbeque pavilions, open lawns for picnic and play, multipurpose paths including a lake edge walking path, and an active wetland. Lake Park will be privately owned, but publicly accessible for use from dawn until dusk through the conveyance of public use easements, and therefore available as a recreational facility that can be used by those working at the Proposed Project.

As described in Table 3.13-4, Parkland Analysis, with the inclusion of 933 residents and 11.89 acres of park under the Adjusted Baseline, the ratio of parkland per 1,000 residents would increase from 0.81 under existing conditions to 0.91 under Adjusted Baseline. While the ratio of parkland per 1,000 residents would increase, it would remain below the City's goal of 1 acre of parkland per 1,000 residents.

Under existing conditions, in South Inglewood with only Center Park as available parkland, the ratio of parkland per 1,000 residents is 0.28 and is the basis for the consideration of South Inglewood as "park-poor". With the added residents and parkland that would be added to South Inglewood under the Adjusted Baseline, the parkland per 1,000 residents would increase to 1.84, well above the Citywide average and in excess of the General Plan goal.

No other changes from the existing setting for Parks and Recreation are anticipated under the Adjusted Baseline.

3.13.11 Regulatory Setting

Federal

There are no federal regulations, plans, or policies applicable to parks or recreational services relevant to the Proposed Project.

State

State Public Park Preservation Act

The primary instrument for protecting and preserving parkland is the State Public Park Preservation Act. Under the Public Resources Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

Quimby Act

California Government Code Section 66477, Subdivision Map Act, referred to as the Quimby Act, permits local jurisdictions to require the dedication of land and/or the payment of in-lieu fees solely for park and recreation purposes. The required dedication and/or fee are based upon the

residential density and housing type, land cost, and other factors. Land dedicated and fees collected pursuant to the Quimby Act may be used for developing new, or rehabilitating existing park or recreational facilities.

Government Code 65560

Government Code 65560 defines open space as:

- b. "Open space land" is any parcel or area of land or water which is essentially unimproved and devoted to an open space use as defined in this section, and which is designated on a local, regional or state open space plan as any of the following:
 - 1) Open space for the preservation of natural resources including, but not limited to, areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays and estuaries; and coastal beaches, lake shores, banks of rivers and streams, and watershed lands.
 - 2) Open space used for the managed production of resources, including but not limited to, forest lands, rangeland, agricultural lands and areas of economic importance for the production of food or fiber; areas required for recharge of ground water basins; bays, estuaries, marshes, rivers and streams which are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.
 - 3) Open space for outdoor recreation, including but not limited to, areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes, including access to lake shores, beaches, and rivers and streams; and areas which serve as links between major recreation and open space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.
 - 4) Open space for public health and safety, including, but not limited to, areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high re-risks, areas required for the protection of water quality and water reservoirs and areas required for the protection and enhancement of air quality.

Local

City of Inglewood General Plan

The City of Inglewood General Plan, Open Space Element,⁶⁹ was designed to address the current and future needs of the community for park land and recreational facilities. This element serves as a plan for the conservation or creation of open space to mitigate the effects of the increasing urbanization of the City. The City's 1995 Open Space Element provides standards for the provision of recreational facilities through the City and includes local recreation standards. The 1995 Open Space Element explained that the City's 1973 Open Space and Parks Element

⁶⁹ City of Inglewood, Community Development and Housing Department, *1995 City of Inglewood General Plan, Open Space Element*, Adopted December 1995, <http://www.cityofinglewood.org/DocumentCenter/View/131/Open-Space-Element>, accessed August 2018.

recommend a standard ratio of four acres of recreational park land per 1,000 residents, and that the City's more ambitious Community Review Program prepared in 1972 recommended a standard of seven acres per 1,000 residents which was recommended by the 1972 Community Review Program. Due to the lack of undeveloped and underutilized land in the City, and due to the increased cost of acquiring and clearing land that is already developed and inhabited, the 1995 Element determined that the City may never achieve the standards advocated in 1972 and 1973. Instead, the 1995 Element recommended that the City strive for a more realistic and achievable standard: a minimum threshold of one acre per 1,000 residents.⁷⁰ As the 1995 Open Space Element is the most recently adopted Element by the City, the recommended standard of one acre per 1,000 residents is used to determine the Project's impacts on parks or recreational services.⁷¹ The following goals and objectives from the City of Inglewood General Plan Land Use Element and the Open Space Element are applicable to the Proposed Project:

Land Use Element

Goal: Pursue the continued acquisition and development of parks and recreation facilities to the extent feasible within the City's budgetary capability.

Open Space Element

Goal: The primary goal of the Open Space Element is to provide recreational park facilities for all residents in Inglewood.

Goal: The second goal of the Open Space Element, after providing recreational park facilities, is to provide additional types of open space and to preserve existing open space resources.

Policy 1: The City of Inglewood and its redevelopment agency, in reviewing and approving development plans, shall require the provision of landscaped plazas and gardens when possible, and the provision of landscaping within building setbacks and parking lots.

The Proposed Project would not include residential uses, and thus would not increase the residential population of the City nor impact the City's standard ratio of one acre of parkland per 1,000 residents. The Proposed Project would not be inconsistent with each of the goals and policies listed above.

As further discussed below in Impact 3.13-5, 3.13-6, and 3.13-7, the Proposed Project would include an outdoor plaza, new pedestrian networks, landscaping and edge treatment, sidewalk and pavement improvements and other open spaces that would be designed to facilitate pedestrian movement and activities. The plaza would include outdoor gathering spaces, and an outdoor stage on the east side of the plaza that could be used for community performances, small musical shows, or supplemental events related to Arena activities. However, because the Proposed Project would not provide on-site park space to meet the park requirements of the City, the Proposed Project would be required to pay the applicable park development fees to offset potential impacts

⁷⁰ City of Inglewood, - 1995, *City of Inglewood General Plan Open Space Element*, December 1995.

⁷¹ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.

on parks or recreational facilities in the City. The Proposed Project has no potential inconsistencies with the above-referenced goals and policies of the City of Inglewood General Plan Open Space Element. Ultimately, it is within the authority of the City Council to determine consistency of the Proposed Project with the City of Inglewood General Plan.

3.13.12 Analysis, Impacts and Mitigation

Significance Criteria

The City has not adopted thresholds of significance for analysis of impacts to parks or recreational services. The following thresholds of significance have been adapted from CEQA Guidelines section 15065 and CEQA Guidelines Appendix G. A significant impact would occur if the Proposed Project would:

1. Result in substantial adverse physical impacts associated with the need for or provision of new or physically altered parks or recreational facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks or recreational facilities;
2. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
3. Include recreational facilities or require the construction or expansion of recreation facilities which might have an adverse physical effect on the environment.

Methodology and Assumptions

Analysis of parks or recreational impacts is typically based on an estimate of a project's resident population size, given the number of proposed residential units, and a description of a project's park, recreation and open space features and their effects in serving a project's residents and thereby reducing potential impacts on local park facilities. The Proposed Project does not propose residential uses. However, the Proposed Project would increase the number of people at the Project Site and in the project vicinity, which includes visitors, customers, and employees which could use park and recreational facilities. The analysis also addresses potential impacts on park facilities that might occur due to construction activities.

The Parks Department was consulted on this analysis and the responses provided regarding the Proposed Project were incorporated. Correspondence with the Parks Department is contained in the Draft EIR Appendix X. Based on this information and consultation with the Parks Department, a determination was made as to whether the City would require new or physically altered facilities for the provision of parks or recreational services in order to maintain acceptable service ratios or other performance objectives for parks or recreational services. If such facilities would be required, the analysis considers whether the construction of such facilities would reasonably be expected to cause significant environmental impacts. A determination was also made as to whether the Proposed Project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or if the Proposed Project would include recreational

facilities or require the construction or expansion of recreation facilities which might have an adverse physical effect on the environment.

Impacts and Mitigation Measures

Impact 3.13-5: Implementation of the Proposed Project could result in substantial adverse physical impacts associated with the need for or provision of new or physically altered parks or recreational facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks or recreational facilities. (Less than Significant)

The demand for parks and recreation facilities is created by both residents who live in the City of Inglewood, as well as by people who work, do business, and attend events or other activities within the City. The potential effects of all of these sources of demand during construction and operation of the Proposed Project are addressed below.

Construction

Construction of the Proposed Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households to become residents of Inglewood as a consequence of working on the Proposed Project is negligible.

Because the nearest publicly-accessible park, Lake Park, is located approximately 0.25 miles north of the Project Site, it is possible that a small number of construction workers may visit the park to eat lunch or for recreation. Construction workers are temporary employees with high turnover rates associated with the various phases of construction, and are unlikely to frequently use park facilities such as Lake Park; it is much more likely that construction workers take lunch breaks on the project site and travel home after the work day. As such, use of Lake Park or other City parks by project construction workers would be infrequent and intermittent. Therefore, the construction workers associated with the Proposed Project would not result in an increase in the residential population of the City, or an increase in demand for parks or recreational facilities in the vicinity of the Project Site.

Based on the above, construction of the Proposed Project would not generate a demand for park or recreational facilities that would not be adequately accommodated by existing facilities and services, nor would project construction interfere with existing park usage in the vicinity of the Project Site. Construction of the Proposed Project would not necessitate the provision of new or physically altered parks or recreational facilities, the construction of which would cause significant adverse physical impacts in order to maintain acceptable service ratios or other performance objectives. Therefore, impacts on parks and recreational facilities during construction of the Proposed Project would be **less than significant**.

Operation

The Proposed Project would include an outdoor plaza, new pedestrian networks, landscaping and edge treatment, sidewalk and pavement improvements and other open spaces that would be designed to facilitate pedestrian movement and activities; refer to Figure 2-16 in Chapter 2, Project Description. An integral element of the Proposed Project would be the plaza, an approximately 80,000 square-foot (1.8-acre) large outdoor space designed to accommodate crowds associated with arena events, and also serve as an activity center and outdoor space for everyday use by visitors and employees. The plaza would include outdoor gathering spaces, and an outdoor stage on the east side of the plaza that could be used for community performances, small musical shows, or supplemental events related to arena activities.

The Proposed Project would not include residential uses, and thus would not increase the residential population of the City nor impact the City's standard ratio of one acre of parkland per 1,000 residents.

The Proposed Project would result in an increased number of people at the Project Site and project vicinity comprised of patrons attending LA Clippers homes games and other events such as concerts, conventions, family shows, corporate/community events, plaza events and other events at the proposed arena; customers visiting the proposed retail and restaurant uses; visitors to the proposed community uses; hotel guests; and employees of the Arena, the LA Clippers, and the various commercial, hotel, retail and restaurant uses that would be developed as part of the Proposed Project. The increase daily population at the Project Site could increase the demand for parks and recreational facilities.

Retail customers, hotel patrons, and project employees could be users of local parks, either as part of trips to the City, or daytime work breaks. However, these uses would be expected to be limited and would not place a material demand on park or recreation facilities. Most people utilize parks in the vicinity of their homes for weekend family recreation, or use by children for organized sports or non-organized play. As such, the relatively small number of project employees and patrons are not expected to place a substantial demand on local parks and recreation resources.

Most of the events with the largest anticipated attendance in the arena, and thus the majority of arena attendees, would occur primarily during evening hours when most City and other publicly-accessible parks, including the Lake Park and Center Park, are closed for operation. All City parks operate from 8:00 a.m. to 8:00 p.m. except for Siminski Park, which closes at dusk. Athletic field usage at Rogers Park, Darby Park, and Edward Vincent Park is allowed until 10:00 p.m.⁷² Based on the hours of operation, use of City parks in post-event hours would not occur. It is possible that daytime customers and event attendees, and evening attendees during pre-event hours, could use City parks. Based on the City's long experience with The Forum, there is no pattern of regular or frequent use of City parks by event attendees who typically travel to the vicinity of the venue in the hour prior to the event (see Section 3.14, Transportation for

⁷² Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, email correspondence dated January 2, 2019.

information on arrival patterns). Thus, the City considers the potential use of public parks by event attendees to be limited and infrequent.

For the above reasons, event attendees, project customers, hotel patrons, and/or project employees would not create a substantial demand on local parks or recreation facilities such that a need for new or physically altered facilities for the provision of park or recreation facilities is created. Therefore, potential impacts on parks and recreation facilities due to operation of the Proposed Project would be **less than significant**.

Mitigation Measures

None required.

Impact 3.13-6: Implementation of the Proposed Project could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated. (Less than Significant)

As is explained above, under Impact 3.13-5, the Project Site is located within South Inglewood, District 4, which is underserved by City parks and recreation facilities, and is considered “park poor” with regards to parks or recreational services. The only existing City park within Adjusted Baseline District 4 is includes the 11.89-acre Lake Park and 1.8-acre Center Park, a neighborhood park located approximately one mile southeast of the Project Site, and maintains a parkland per 1,000 residents ratio of 1.84.

As also discussed above under Impact 3.13-5, it is unlikely that there would be a material use of City and other publicly-accessible parks and recreational facilities in the City of Inglewood by attendees to events at the proposed arena, nor is it reasonably expected that retail customers, hotel patrons, or project employees would substantially use existing parks or recreational facilities in the City.

The Adjusted Baseline includes Lake Park the 11.89-acre Lake Park, just one-quarter mile north of the Project Site. The addition of this publicly-accessible park would make this portion of the City less “park poor,” thus changing the existing conditions and reducing the demand for parks or recreational services within South Inglewood. Lake Park would be designed and constructed to withstand substantial use and is capable of serving large numbers of visitors. Pursuant to the development agreement approved as part of the City of Champions Initiative, Lake Park would be operated and regularly maintained at levels consistent with the City’s requirements for City parks, to ensure substantial deterioration from use does not occur. Similarly, Center Park and other City-owned parks are regularly maintained by the City. Lake Park would directly serve the Hollywood Park Specific Plan HPSP demand and by adding to the total publicly-accessible park acreage in the City is anticipated to serve the Proposed Project’s demand for parks and recreational facilities. The addition of nearly 12 acres of publicly-accessible park just 0.25 miles from the Project Site would satisfy any limited incremental demand for use of parks or recreational facilities. Because

of the magnitude of publicly-accessible parks and recreation facilities in vicinity of the Project Site, it is unlikely that the incremental use of parks in the City of Inglewood would cause physical deterioration of these facilities.

Because any potential use of City parks by project event attendees, customers, and/or employees would be very limited, and given the availability of the 12-acre Lake Park to accommodate ~~accommodate~~ any demand for parks or recreational facilities created by the Proposed Project, it is not foreseeable that such use could result in substantial physical deterioration of such facilities. Thus, the Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and the impact would be **less than significant**.

Mitigation Measures

None required.

Impact 3.13-7: Implementation of the Proposed Project could include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. (Less than Significant)

The Proposed Project would include a privately owned outdoor plaza, new pedestrian networks, landscaping and edge treatment, sidewalk and pavement improvements and other open spaces that would be designed to facilitate pedestrian movement and activities. These amenities and open space areas would be developed within the Project Site, and no new or expanded off-site parks or recreational facilities are proposed. The construction and operation of the Proposed Project's plaza and pedestrian facilities could have adverse physical environment effects, which are analyzed and disclosed in other sections of Chapter 3 of this EIR. In large part, the Proposed Project is analyzed as a singular set of proposed development components. There are some effects that are specific to the plaza, such as the noise effects of amplified sound emanating from the stage that is proposed to be included in the plaza (see Section 3.12, Noise, Impact 3.12-X). For most other issues, such as potential effects on cultural resources, aesthetic effects of plaza lighting and signage, effects of runoff from the plaza and pedestrian facilities, and the like, the impacts of construction of the plaza and pedestrian facilities are not distinguishable from the effects of the overall Proposed Project. The construction of the plaza and pedestrian facilities included in the Proposed Project would have no additional environmental impacts that are not already analyzed and disclosed in the other resource sections of this EIR (e.g., Section 3.3, Biological Resources, Section 3.4, Cultural Resources, and Section 3.9, Hydrology and Water Quality). Therefore, this impact would be **less than significant**.

Mitigation Measures

None required.

Cumulative Impacts

The geographic context for analysis of cumulative impacts related to parks or recreational facilities includes the City of Inglewood because it is the City that operates and maintains neighborhood and City parks in the City. The geographic context is further defined as those cumulative projects located within South Inglewood (District 4), since the Parks Department addresses the needs for parks or recreational services by each of the four City Council Districts.⁷³ Cumulative development located in other jurisdictions would typically be served by local parks or recreational facilities located in the cities or county where the development is located.

Based on evaluation of the Cumulative Projects List presented in Table 3.0.2, 32 of the 146 cumulative projects are located within the City of Inglewood (Cumulative Projects numbers 42 through 73). The development of the 32 cumulative projects located in the City of Inglewood is anticipated to result in construction of 3,055 residential units, 417,559 sf of commercial uses, 451,923 sf of retail uses, 3,567,314 sf of office uses, 424 hotel rooms, 25,500 sf of schools uses, 30,000 sf of civic center uses, and approximately 13 acres of open space.

Of these 32 cumulative projects, five (Cumulative Projects 53, 54, 65, 67, and 73) are located within South Inglewood (District 4), and would result in the construction of 2,192 residential units, 371,923 sf of retail uses, 3,567,314 sf of office uses, 420 hotel rooms, 30,000 sf of miscellaneous uses, and approximately 13 acres of open space. The development of the 32 cumulative projects located in the City of Inglewood is anticipated to result in construction of 3,055 residential units, 417,559 sf of commercial uses, 451,923 sf of retail uses, 3,567,314 sf of office uses, 424 hotel rooms, 25,500 sf of schools uses, 30,000 sf of civic center uses, and approximately 13 acres of open space.

Impact 3.13-8: Implementation of the Proposed Project, in combination with related cumulative projects, could contribute to cumulative substantial adverse physical impacts associated with the need for or provision of new or physically altered parks or recreational facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks or recreational facilities. (Less than Significant)

Construction

As discussed above under Impact 3.13-5, use of City and other publicly-accessible parks and recreation facilities by construction workers, if any, would be infrequent and intermittent and could be dispersed throughout the Adjusted Baseline of 101.49 acres of parkland and 11 recreation open space areas within the City. Use of parks is more determined by location of residence rather than place of employment. Because construction workers do not tend to choose a

⁷³ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018 and City of Inglewood, *Council Districts 2006 Map*, January 2006, [HYPERLINK "https://www.cityofinglewood.org/DocumentCenter/View/750/Council-District-Map-Sample-PDF?bidId"], accessed March 2019.

place of residence based on the location of an individual construction project, the construction workers who work on the Proposed Project and the 32 cumulative projects located within the City of Inglewood would not result in a substantial increase of residential population within the City.

For the reasons described above, construction of the Proposed Project in combination with other cumulative development in the City of Inglewood would not necessitate the provision of new or physically altered parks or recreational facilities, the construction of which would cause significant adverse physical impacts in order to maintain acceptable service ratios or other performance objectives. Therefore, the cumulative impact of the Proposed Project and cumulative development on the need for or provision of new or physically altered parks or recreational facilities would be **less than significant**.

Operation

According to the Open Space Element, the northern and northeastern parts of the City are adequately served by parks having recreational facilities, while the southern portions of the City are not adequately served for such parks. The cumulative development 3,055 residential units would increase park demand in the City by 9.07 acres, but would add over 13 acres of parks and open space land.⁷⁴ More specifically, ~~(~~The development of the five cumulative projects located within South Inglewood (Cumulative Projects 53, 54, 65, 67, and 73) would include approximately 2,192 residential units, which would increase park demand in District 4 by 6.51 acres while adding over 13 acres of parks and open space.⁷⁵ Therefore, operation of the Proposed Project, along with other reasonably foreseeable cumulative development would increase the demand for parks or recreational services, but would add parks and open space in excess of the demand created by cumulative residential development.

As described above under Regulatory Setting, the City maintains a minimum threshold of one acre per 1,000 residents to determine the need for parks and recreational facilities. Under the Adjusted Baseline, including the City's existing 89.6 acres of parkland plus the development of the 11.89-acre Lake Park within the HPSP Adjusted Baseline development, there are a total of 101.49 acres of parkland in Inglewood, approximately 0.91 acres of parkland per 1,000 residents.⁷⁶ ~~Therefore, u~~Under the Adjusted Baseline the parkland per 1,000 residents ratio would

⁷⁴ 3,055 residential units X 2.97 persons per household (per the City of Inglewood General Plan 2014 Housing Element) = 9,073 residents. 9,073 residents/1,000 persons = 9.07 acres (per the City of Inglewood General Plan 1995 Open Space Element recommendation of one acre per 1,000 residents which is used to determine a project's impacts on parks or recreational services).

⁷⁵ 2,192 residential units X 2.97 persons per household (per the City of Inglewood General Plan 2014 Housing Element) = 6,510 residents. 6,510 residents/1,000 persons = 6.51 acres (per the City of Inglewood General Plan 1995 Open Space Element recommendation of one acre per 1,000 residents which is used to determine a project's impacts on parks or recreational services).

⁷⁶ Per the [US Census](https://www.census.gov/quickfacts/inglewoodcitycalifornia) (<https://www.census.gov/quickfacts/inglewoodcitycalifornia>, accessed January 2019), the City of Inglewood population as of July 1, 2017 was 110,598 persons. 110,598 persons + 933 residents (total residents from the Hollywood Park Specific Plan Adjusted Baseline) = 111,531 persons. 111,531 persons/1,000 = 111.531. 89.6 acres of existing parkland + 11.89 acres of parks/open space from the Hollywood Park Specific Plan (Lake Park) = 101.49 acres of parkland for the Adjusted Baseline. 101.49/111.531 = 0.9 acres/1,000 people.

increase from 0.81 under existing conditions to 0.91. Nevertheless, under the Adjusted Baseline, the City would not meet its goal for provision of parkland.

The ~~Hollywood Park Specific Plan~~HPSP area is located immediately north of the Proposed Project and within South Inglewood (District 4). Cumulative Project 67, which includes the remainder of the HPSP not included in the Adjusted Baseline, would include the development of the approximately 2.5-acre Arroyo Park, the approximately 10.57-acre Bluff Park, and the Champion Plaza. Like Lake Park, the Arroyo Park and Bluff Park would both be privately owned, but publicly accessible for use from dawn until dusk through the conveyance of public use easements. Arroyo Park would be a naturalistic park organized around shallow, vegetated swales that would also provide stormwater management with park amenities. ~~The~~ Bluff Park would be an active recreation park, that would include a venue for outdoor activity and recreation, open fields for informal sports, a tot-lot, picnic space, dog park, a restroom, and parking. ~~The~~ Champion Plaza would be a large open plaza providing a variety of program amenities such as a central gathering area for events, outdoor steps and terraced seating, and an interactive water feature.

If all 32 cumulative projects located within the City of Inglewood are constructed, including the proposed 2.5-acre Arroyo Park and 10.57-acre Bluff Park of the Hollywood Park Specific Plan, excluding the Adjusted Baseline, the City's ratio of parkland acres per 1,000 residents would still berise from 0.91 acres-of-parkland-per-1,000-residents to 0.95⁷⁷; thereby, not meeting the City's goal of one acre per 1,000 residents. However, cumulative projects with a residential component would be required to comply with the City's Municipal Code, Article 30, Park Land Dedication, In-Lieu Fees and Park Development Fees, which require the provision of on-site open space and park facilities and/or payment in-lieu fees to offset a project's impact to off-site park and recreational facilities.

As described above, the Proposed Project would not include residential uses, and thus, would not increase the residential population of the City. Although the Proposed Project would increase the number of visitors, customers, and employees at the Project Site. Most major events with the anticipated largest attendance in the arena would occur primarily during evening hours when most City parks, including Lake Park and Center Park, are closed for operation. However, although negligible, event attendees could use these parks during the pre-event hours. Retail customers and project employees are more likely to continue the use of existing parks or recreational facilities near their homes during non-work hours. Event attendees, customers, or project employees would not be expected to increase the demand on local parks resulting in a need for new or physically altered facilities for the provision of park or recreation facilities. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to the demand for recreation facilities. Because the related cumulative projects would not exacerbate

⁷⁷ Per the US Census (<https://www.census.gov/quickfacts/inglewoodcitycalifornia>, accessed January 2019), the City of Inglewood population as of July 1, 2017 was 110,598 persons. $110,598 \text{ persons} + 9,073 \text{ persons (total population from the 32 cumulative projects located within the City of Inglewood)} = 119,309 \text{ persons}$. $119,671 \text{ persons}/1,000 = 119.67$. $89.6 \text{ acres of existing parkland} + 13.07 \text{ acres of parks/open space from the Hollywood Park Specific Plan} = 102.67 \text{ acres of existing and future parkland}$. $102.67/119.67 = 0.86 \text{ acres}/1,000 \text{ people (rounds up to 0.9)}$.

the effect of the Proposed Project, the Proposed Project's contribution to a significant cumulative impact would not be considerable, and therefore, impacts would be **less than significant**.

Mitigation Measures

None required.

Impact 3.13-9: Implementation of the Proposed Project, in combination with related cumulative projects, could contribute to the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. (Less than Significant)

As described under Impact 3.13-8 and in Table 3.13-~~11~~¹⁴, under cumulative conditions in the City of Inglewood the ratio of parkland per 1,000 residents would rise 0.95, but would remain below the goal of 1 acre per 1,000 residents. In South Inglewood, the ratio of parkland ratio would rise to 1.92 acres per 1,000 residents, nearly double the City's goal.

Despite the fact that the citywide ratio of parking per 1,000 residents would remain below the City's goal, cumulative development including the Proposed Project would improve conditions as compared to Adjusted Baseline conditions. The Proposed Project would contribute neither residents nor parkland to the City, but would add private open space in the form of a 1.8-acre private plaza that would serve as the primary entry to the Arena. In addition to adding parkland and improving the ratio of residents to parkland in the city, cumulative projects with residential uses would be required to comply with the City's Municipal Code, Article 30, Park Land Dedication, In-Lieu Fees and Park Development Fees, which require the provision of on-site open space and park facilities and/or payment in-lieu fees to offset a project's impact to off-site park and recreational facilities.

Because cumulative development, including the Proposed Project, would result in improved conditions related to the availability of parks and recreation facilities in the City and in South Inglewood, and any potential use of City parks by project event attendees, customers, and/or employees would be very limited, it is not foreseeable that cumulative development would result in substantial physical deterioration of such facilities. Therefore, the cumulative impact related to the physical deterioration of neighborhood and regional parks as a result of increased use due to cumulative development including the Proposed Project would be **less than significant**.

Mitigation Measures

None required.

Impact 3.13-10: Implementation of the Proposed Project, in combination with related cumulative projects, could include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. (Less than Significant)

As described above, cumulative development within the City of Inglewood would include 13.07 acres of parks which will be publicly accessible (see Cumulative Project 67). Therefore, implementation of the Proposed Project, along with the operations of past, present, and reasonable future projects, would include recreational facilities, or could require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Development of the 13.07 acres of park and open space within Cumulative Project 67 could have an adverse physical effect on the environment but these effects are addressed in the discussions of potential cumulative impacts analyzed under other environmental topics in Chapter 3, Environmental Impacts, Settings, and Mitigation Measures, of this EIR (e.g., Section 3.3, Biological Resources, Section 3.4, Cultural Resources, and Section 3.9, Hydrology and Water Quality). The parks and open space included within the cumulative projects would not have any environmental impacts, cumulative or otherwise, that are not already analyzed in the other resource sections. Therefore, this cumulative impact would be **less than significant**.

Mitigation Measures

None required.

Public Schools

3.13.13 Environmental Setting

Regional and Local Setting

The IUSD provides education to students in grades kindergarten through 12 residing within the City, portions of the cities of Culver City, Hawthorne, and Los Angeles, and a portion of the unincorporated County of Los Angeles. IUSD rules also provide that people employed within the IUSD boundaries may enroll their children in IUSD schools.

During the 2017-2018 school year, the IUSD operated 18 schools which consisted of 10 elementary schools, one transitional K-8 schools, three middle schools, three high schools, and one continuation school;⁷⁸ refer to **Figure 3.13-3** for the locations of the schools within the IUSD. Also located within the school boundaries of the IUSD are 8 charter schools which include

⁷⁸ California Department of Education website, 2017-2018 data, Available at: [HYPERLINK "https://www.cde.ca.gov/ds/sd/sd/filesenr.asp"], accessed March 2019.

one elementary school, four transitional K-8 schools, two middle schools, one high school.⁷⁹ Further, nonpublic, nonsectarian schools⁸⁰ are also located within the school boundaries of the IUSD.⁸¹ The IUSD employed approximately 450 teachers, 60 administrators, 40 pupil-services personnel, and 470 support staff during the 2017-2018 school year.⁸²

Collectively, the IUSD’s school facilities in school year 2017-2018 had a capacity of 10,199 student seats based on classroom utilization information provided by the IUSD; refer to **Table 3.13-4** below. Of these 10,199 seats, 5,247 seats were at the elementary school level, 2,873 seats were at the middle school level, and 2,079 seats were at the high school level.⁸³ This capacity includes all permanent facilities in the IUSD except those at the Clyde Woodworth Elementary School since this campus will be closed in school year 2018/2019 and combined with the Albert F. Monroe Magnet Middle School. Portable classrooms are excluded because the existing leased portable classrooms are being returned, and the owned portable classrooms are being removed due to their current conditions and to reduce operational inefficiencies.⁸⁴ The total enrollment of the IUSD in school year 2017-2018, excluding charter schools and nonpublic, nonsectarian schools located within the school boundaries of the IUSD, was 8,499 students. As shown in **Table 3.13-4**, the IUSD’s facilities capacity exceeded student enrollment for all school levels in school year 2017-2018. The IUSD had a surplus of 597 elementary school seats, a surplus of 1,016 middle school seats, and a surplus of 87 high school seats.⁸⁵

TABLE 3.13-4
SCHOOL FACILITIES CAPACITY AND STUDENT ENROLLMENT 2017-2018^A

School Level	2017-2018 Facilities Capacity ^b	2017-2018 Student Enrollment ^c	Excess/(Shortage) Capacity
Elementary School (Grades K-5)	5,247	4,650	597

⁷⁹ California Department of Education website, *2017-2018 data*. Available at: [HYPERLINK "https://www.cde.ca.gov/ds/sd/sd/filesenr.asp"], accessed March 2019.

⁸⁰ California Education Code section 56034 states "Nonpublic, nonsectarian school means a private, nonsectarian school that enrolls individuals with exceptional needs pursuant to an individualized education program, employs at least one full-time teacher who holds an appropriate credential authorizing special education services, and is certified by the department. It does not include an organization or agency that operates as a public agency or offers public service, including, but not limited to, a state or local agency, an affiliate of a state or local agency, including a private, nonprofit corporation established or operated by a state or local agency, or a public university of college. A nonpublic, nonsectarian school also shall meet standards as prescribed by the superintendent and board; per Education Code 56034." Source: http://www.sosomaxelpa.org/docs/ed_code.pdf.

⁸¹ California Department of Education website, *2017-2018 data*. Available at: [HYPERLINK "https://www.cde.ca.gov/ds/sd/sd/filesenr.asp"], accessed March 2019.

⁸² Inglewood Unified School District, *2018-2023 Strategic Plan, The Inglewood Graduate: Read from Day One!*, updated November 2018, http://www.myiued.net/wp-content/uploads/2018/11/IUSD-SAP_111518_high-quality-print.pdf.

⁸³ Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018; prepared by Cooperative Strategies, available at https://www.myiued.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf.

⁸⁴ Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018; prepared by Cooperative Strategies, available at https://www.myiued.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf.

⁸⁵ Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018; prepared by Cooperative Strategies, available at https://www.myiued.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf.

TABLE 3.13-45
SCHOOL FACILITIES CAPACITY AND STUDENT ENROLLMENT 2017-2018^A

Middle School (Grades 6-8)	2,873	1,857	1,016
High School (Grades 9-12)	2,079	1,992	87
Existing Total	10,199	8,499	1,700

NOTES:

- ^a 2017-2018 is the most recent school year information available.
- ^b Capacity based on classroom utilization information provided by the IUSD in the Inglewood Unified School District Commercial/Industrial Development School Fee Justification Study.
- ^c 2017-2018 student enrollment provided by the California Department of Education.

SOURCE: Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies, available at [HYPERLINK "https://www.myiUSD.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf"]; and California Department of Education website, 2017-2018 data, [HYPERLINK "https://www.cde.ca.gov/ds/sd/sd/filesenr.asp"], accessed March 2019.

In recent years, the IUSD has experienced declining student enrollment, changing demographics, challenging socioeconomic conditions for families, a drop in school funding, and the expansion of charter schools. Overall, year-to-year annual student enrollment in the IUSD has steadily declined while enrollment in area charter schools has slightly increased.⁸⁶ During the 2017-2018 school year, charter schools located within the school boundaries of the IUSD included 1,644 elementary students, 776 middle school students, and 634 high school students for a total enrollment of 3,054 students.⁸⁷ During the 2017-2018 school year, nonpublic, nonsectarian schools located within the school boundaries of the IUSD included 356 elementary students, 100 middle school students, 77 high school students for a total enrollment of 533 students.⁸⁸ Specifically, enrollment in the IUSD has decreased approximately 47 percent, or more than 8,300 students since 2003. Since the 2014-15 school year, enrollment in the IUSD has decreased by nearly 1,700 students. Enrollment in the IUSD decreased by approximately 800-700 students in the 2016-2017 school year and by another 500-486 students in the 2017-2018 school year. The enrollment decline is expected to continue with enrollment dropping by approximately 500 students in the 2017-2018 school year and another 1,000-950 students expected to depart in the next two years.⁸⁹

3.13.14 Adjusted Baseline Environmental Setting

As discussed in Chapter 3.0, Section 3.0.5, Section 3.13, Public Service assumed the Adjusted Baseline. Accordingly, the changes to schools associated with these developments within the

⁸⁶ Inglewood Unified School District, *2018-2023 Strategic Plan, The Inglewood Graduate: Read from Day One!*, updated November 2018, https://www.myiUSD.net/wp-content/uploads/2018/11/IUSD-SAP_111518_high-quality-print.pdf.

⁸⁷ California Department of Education website, *2017-2018 data*, Available at: [HYPERLINK "https://www.cde.ca.gov/ds/sd/sd/filesenr.asp"], accessed March 2019.

⁸⁸ California Department of Education website, *2017-2018 data*, Available at: [HYPERLINK "https://www.cde.ca.gov/ds/sd/sd/filesenr.asp"], accessed March 2019.

⁸⁹ California School Information Services, Fiscal Crisis and Management Assistance Team, 2018, *Inglewood Unified School District Progress Report page 361*, July 2018, page 361.

Hollywood Park Specific Plan area are considered as part of the Adjusted Baseline Environmental Setting.

As shown in **Table 3.13-66**, development associated with the HPSP Adjusted Baseline development would generate approximately 111 elementary school students, 45 middle school students, and 44 high school students for a total increase of 200 additional students that would be attending schools within the IUSD. **Table 3.13-67** describes school facilities capacity and student enrollment under the Adjusted Baseline. The IUSD would have available capacity of 486 elementary school seats, 971 middle school seats, and 43 high school seats under Adjusted Baseline conditions.

No other changes from the existing setting for Public Schools are anticipated under the Adjusted Baseline.

TABLE 3.13-86
STUDENT GENERATION IN ADJUSTED BASELINE DEVELOPMENT

Land Use	Development	Units	Elementary School ^{ab}	Middle School ^{ab}	High School ^{ab}	Total ^c
Proposed Uses						
70,000 Seat NFL Stadium ^f	2,000,000 ^d	sq. ft.	41	17	16	74
6,000 Seat Performance Venue ^f	153,913 ^e	sq. ft.	3	1	1	5
Retail and Restaurant Uses ^f	518,077	sq. ft.	11	4	4	19
Office ^g	466,000	sq. ft.	15	6	6	27
Residential ^h	314	Units	41	17	17	75
Total Students			111	45	44	200

NOTES:

- ^a Calculated by multiplying each of the proposed uses by its respective student generation rates. Student generation rates are taken from the Inglewood Unified School District Commercial/Industrial Development School Fee Justification Study, Table 10, Average Student Generation Impacts per 1,000 Square Feet CID, page 21, prepared by Cooperative Strategies, dated May 17, 2018. Retail and Services per 1,000 sq. ft. = 0.0203 for elementary school; 0.0083 for middle school; and 0.0082 for high school. Office per 1,000 sq. ft. = 0.0317 for elementary school; 0.0129 for middle school; and 0.0128 for high school. Hospital per 1,000 sq. ft. = 0.0252 for elementary school; 0.0102 for middle school; 0.0102 for high school. Hotel/Motel per 1,000 square feet = 0.0103 for elementary; 0.0042 for middle school; and 0.0041 for high school.
- ^b Calculated by multiplying each of the proposed uses by its respective student generation rates. Student generation rates are taken from the Inglewood Unified School District Residential Development School Fee Justification Study, Table 5, Adjusted Student Generation Factors, page 11, prepared by Cooperative Strategies, dated May 17, 2018. Multi-family attached units = 0.1316 for elementary school; 0.0540 for middle school; and 0.0534 for high school.
- ^c Rounded to the nearest whole number.
- ^d To find the square footage of a 70,000 square foot NFL stadium, comparable stadiums were researched. The Mercedes Benz Stadium in Atlanta, Georgia has a capacity of 71,000 seats and is 2,000,000 square feet.
- ^e To find the square footage of a 6,000 seat performance venue, comparable performance venues were researched. The Novo by Microsoft in Los Angeles, California has a capacity of 2,300 seats and is 59,000 square feet. 59,000 square feet/2,300 seats = approximately 25 square feet per seat. 6,000 seats X 25 square feet = 153,913 square feet. Source: <https://www.discoverlosangeles.com/la-concert-venues-that-double-as-event-space>
- ^f Retail and services generation rates were used.
- ^g Office generation rates were used.
- ^h Multi-family attached generation rates were used.

SOURCE: Inglewood Unified School District, *Residential Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies, available at https://www.myiUSD.net/wp-content/uploads/2018/05/FCSR-Res-Inglewood_FN.pdf, accessed January 2019; and Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies, available at https://www.myiUSD.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf, accessed January 2019; and ESA 2019.

TABLE 3.13-87
SCHOOL FACILITIES CAPACITY AND STUDENT ENROLLMENT - ADJUSTED BASELINE^A

School Level	2017-2018 Facilities Capacity ^b	2017-2018 Student Enrollment ^c	Excess Capacity (Shortage)
Elementary School (Grades K-5)	5,247	4,761	486
Middle School (Grades 6-8)	2,873	1,902	971
High School (Grades 9-12)	2,079	2,036	43
Adjusted Baseline Total	10,199	8,699	1,500

TABLE 3.13-7
SCHOOL FACILITIES CAPACITY AND STUDENT ENROLLMENT - ADJUSTED BASELINE ^A

NOTES:

- ^a 2017-2018 is the most recent school year information available.
- ^b Capacity based on classroom utilization information provided by the IUSD in the Inglewood Unified School District Commercial/Industrial Development School Fee Justification Study.
- ^c 2017-2018 student enrollment provided by the California Department of Education.

SOURCE: Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies, available at [HYPERLINK "https://www.myiUSD.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf"] and California Department of Education website, 2017-2018 data, [HYPERLINK "https://www.cde.ca.gov/ds/sd/sd/filesenr.asp"], accessed March 2019.

3.13.15 Regulatory Setting

Federal

While public education is generally regulated at the State and local levels, the federal government is involved in providing funding for specialized programs (e.g., school meals, Title 1, Special Education, School to Work, and Goals 2000). However, these monies are not used for general educational purposes and are not applicable to the discussion herein.

State

California Education Code

Education services are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. Further, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.⁹⁰

The California Education Code authorizes the California Department of Education (“Department”) to develop site selection standards for school districts. These standards are found in the California Code of Regulations and require that districts select a site that conforms to certain net acreage requirements established in the Department's 2000 “School Site Analysis and Development” guidebook. The Guide includes the assumption that the land purchased for school sites would be in a ratio of approximately 2 to 1 between the developed grounds and the building area. For example, for a school that houses kindergarten through sixth grade and has an enrollment of 600 children, the recommended acreage is 9.2 acres.

The Department's 2000 Guide includes exceptions to its recommended site size that allow smaller school sites. Additionally, the Department has the policy that if the “availability of land is scarce and real estate prices are exorbitant” the site size may be reduced. It is the Department's policy that if a school site is less than the recommended acreage required, the district shall demonstrate how the students would be provided an adequate educational program including physical education as

⁹⁰ California Education Code Section 17620(a)(1).

described in the district's adopted course of study. Through careful planning, a reduced project area school site could follow the recent trend of school downsizing and meet the Department's criteria.

California School Facility Program

The Leroy F. Greene School Facilities Act of 1998 (known as Senate Bill 50 or SB 50), enacted in 1998, is a program for funding school facilities largely based on matching funds. Proposition 1A was a school construction funding measure that was approved by the voters on the November 3, 1998 ballot. (~~Chapter 407, Statutes of 1998~~) SB 50 created the School Facility Program enabling eligible school districts to obtain state bond funds. State funding requires matching local funds that generally come from developer fees. The passage of SB 50 eliminated the ability of cities and counties to require other forms of mitigation of school overcrowding impacts and provided school districts to assess fees in specified amounts to offset the costs associated with increasing school capacity as a result of new development. The old "Stirling" fees were incorporated into SB 50 and are referred to as Level 1 fees. SB 50 permits the IUSD to levy a fee, charge, dedication, or other requirement against any development (i.e., residential and commercial/industrial) within its boundaries, for the purpose of funding the construction or reconstruction of school facilities.

The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.⁹¹

SB 50 also set a maximum level of fees a developer may be required to pay. As of January 2012, the State Allocation Board (SAB) authorized an adjustment in the Statutory School Fee amounts (Level 1 fees) for unified school districts pursuant to Government Code Section 65995(b)(3) to \$3.20 per square foot for new residential development and \$0.51 per square foot for commercial and industrial (non-residential) development. Districts meeting certain criteria may collect Level 2 fees as an alternative to Level 1 fees. Level 2 fees are calculated under a formula in SB 50. Level 3 fees are approximately double Level 2 fees and are implemented only when the State Allocation Board is not apportioning state bond funds. The passage of Proposition 51 on November 8, 2016 authorized an additional \$9 billion in general obligation bonds for the construction and modernization of schools across California. Although for purposes of CEQA SB 50 states that payment of developer fees are "deemed to be complete and full mitigation" of the impacts of new development on school overcrowding, fees and state funding do not fully fund new school facilities. The IUSD receives Level 1 and Level 2 fees.⁹² Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to mitigate potential

⁹¹ State of California, Office of Public School Construction, *2012 School Facility Program Guide*, October 24, 2012, https://www.documents.dgs.ca.gov/opsc/publications/handbooks/sfp_guide.pdf, accessed December 2018.

⁹² GAMUT online, *Inglewood USD, Developer Fees website*, Available at: [HYPERLINK "<http://www.gamutonline.net/district/inglewoodusd/displayPolicy/945279/7>"], accessed March 2019.

impacts of increased enrollment that may result from implementation of a project to a less-than-significant level.⁹³

Local

City of Inglewood General Plan

The City of Inglewood General Plan, Land Use Element, adopted in 1980 and amended in 1986, 2009, and 2016, presents a long-range plan for the distribution and future use of land within the City. The Land Use Element analyzes population, existing and future land use requirements, and proposed implementation techniques. It provides a framework upon which the development of public and privately owned land can be based.⁹⁴

Neither the City of Inglewood General Plan Land Use Element, nor any of the other elements of the General Plan, contain goals, objectives, or policies regarding public schools.

Inglewood Unified School District

The IUSD serves students in 19 schools including one preschool child development center, three K-5 schools, seven K-6 schools, one K-8 school, one middle (6-8) school, one middle (7-8) school, three high schools, one district-operated charter school (K-8), and one career technical education/adult education/alternative education school. Numerous independent charter schools are also located in the district.⁹⁵

The IUSD provides education to enrolled students who live within the City, portions of the cities of Culver City, Hawthorne, and Los Angeles, and a portion of the unincorporated County of Los Angeles. IUSD rules also provide that people employed within the IUSD boundaries may request enrollment of their children in IUSD schools.

On September 14, 2012, the governor approved Senate Bill (SB) 533, Chapter 325, bringing the district under state receivership. Under state receivership, the State Superintendent of Public Instruction appoints a state administrator to act as both the governing board and superintendent of the IUSD. The IUSD's five-member elected governing board serves in an advisory role. State receivership will continue until the IUSD shows adequate progress in the five operational areas, including finance, human resources, community relations and governance, facilities, and pupil achievement, and the State Superintendent of Public Instruction determines that the district has built sufficient capacity to self-govern. The Los Angeles County Superintendent of Schools role during state receivership is no different than its role during normal times of self-governance.⁹⁶

⁹³ Calif. Government Code § 65996.

⁹⁴ City of Inglewood General Plan, 2016, Land Use Element, updated September 14, 2016. Available: <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>, accessed November 2018.

⁹⁵ California School Information Services, Fiscal Crisis and Management Assistance Team, 2018, *Inglewood Unified School District Progress Report*, page 1, July 2018, page 1.

⁹⁶ California School Information Services, Fiscal Crisis and Management Assistance Team, 2018, *Inglewood Unified School District Progress Report*, page 2, July 2018, page 2.

Pursuant to SB 50, the IUSD collects developer fees for all new residential and non-residential construction within its boundaries (see **Table 3.13-78**).

AR 5117 Students – Inter-District Attendance Permits

In accordance with an agreement between the Board of Education and the board of another school district, a permit authorizing a student’s attendance outside his/her district of residence may be issued upon approval of both the district of residence and the district of proposed attendance. The Superintendent or designee may approve an inter-district attendance permit for a student for parent employment reasons.^{97,98}

**TABLE 3.13-78
 IUSD DEVELOPER FEES (2018)**

Land Use	School Facilities Cost Impacts per Square Foot
Single Family Detached	\$3.10
Multi-family Attached	\$6.14
Retail and Services	\$0.407
Office	\$0.610
Research and Development	\$0.548
Industrial/Warehouse/Manufacturing	\$0.490
Hospital	\$0.507
Hotel/Motel	\$0.206
Self-Storage	\$0.008

SOURCE: Inglewood Unified School District, *Residential Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies, Table 13, School Facilities Cost Impacts per Residential Square Foot (2018) available at <http://www.ryfusd.net/wp-content/uploads/2018/05/FSR-Residential-Fee.pdf>, accessed January 2019; and Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, Table 18, Maximum School Fee per Square Foot of CID, dated May 17, 2018, prepared by Cooperative Strategies, available at http://www.ryfusd.net/wp-content/uploads/2018/05/FS-CID-Inglewood_FN.pdf, Accessed January 2019; and ESA 2019.

The IUSD accepts outgoing inter-district permit applications beginning April 1st and ending September 30th for the subsequent school year. Applicants are only allowed to apply for one school district per school year. If the outgoing inter-district permit is denied by the requested school, the project applicant will have used their one-time option for that school year and must wait until the next outgoing inter-district permit period to re-apply. Applications for incoming inter-district permits are due by February 1st for the subsequent school year. For the present school year, incoming permits are accepted until March 30th. Parents submitting an incoming inter-district permit application for a student in any grade must have a minimum of a 2.0 grade point average (GPA) along with excellent attendance and appropriate behavior.

⁹⁷ Yadallittle Preciado, IUSD staff within the ADA Attendance Clerk’s Office, phone correspondence, January 7, 2018 at 3:45pm.
⁹⁸ Inglewood USD, *AR 5117 Students, Inter-District Attendance Permits*, Available at: <http://www.gamutonline.net/district/inglewoodusd/displayPolicy/1079451/1.3>, Accessed January 2019.

A student's inter-district agreement may be denied or revoked because of poor scholastic achievement, unsatisfactory effort, absences, excessive tardiness, truancy, continued disruption of the education program, impacted programs, or falsification and/or omission of any enrollment documents. Once a student's permit is revoked, the family may not reapply for 12 months for that student. If a parent wants to appeal revocation of the permit, the appealing party must submit a written request to the Superintendent or designee specifying the reasons why the decision should be overruled. This written appeal must be received by the designee within 10 days from the last day of the school year.

The Superintendent or designee may deny initial requests for inter-district attendance permits due to limited district resources, overcrowding of school facilities at the relevant grade level, or other considerations that are not arbitrary. However, once a student is admitted, the district may transfer the student to another school in the district due to overcrowded facilities at the relevant grade level.

Within 30 days of a request for an inter-district permit, the Superintendent or designee shall notify the parents/guardians of a student who is denied inter-district attendance regarding the process for appeal to the County Board of Education as specified in Education Code 46601. An appeal process at the District level shall be utilized. Students who are under consideration for expulsion or who have been expelled may not appeal inter-district attendance denials for decisions while expulsion proceedings are pending, or during the term of the expulsion. Pending a decision by the two districts for an appeal by the County Board, the Superintendent or designee may provisionally admit a student who resides in another district for a period not to exceed two months.

Once a student is admitted to a school on a basis of an inter-district permit, he/she shall not be required to re-apply for an inter-district transfer and shall be allowed to continue to attend the school in which he/she is enrolled, unless reapplication standards are otherwise specified in the inter-district attendance agreement. Existing inter-district attendance permits shall not be rescinded for students entering grade 11 or 12 in the subsequent school year.⁹⁹

3.13.16 Analysis, Impacts and Mitigation

Significance Criteria

The City has not adopted thresholds of significance for analysis of impacts to public schools. The following thresholds of significance have been adapted from CEQA Guidelines section 15065 and CEQA Guidelines Appendix G. A significant impact would occur if the Proposed Project would:

1. Result in substantial adverse physical impacts associated with the provision of or need for new or physically altered facilities for schools, the construction of which could cause

⁹⁹ Inglewood USD, *AR 5117 Students, Inter-District Attendance Permits*, Available at: <http://www.gamutonline.net/district/inglewoodusd/displayPolicy/1079451/1>. Accessed January 2019.

significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.

Methodology and Assumptions

The analysis of enrollment effects on schools is based on the ability of the IUSD school facilities and services to accommodate the potential increase in students generated from development of the Proposed Project and other cumulative development. The analysis estimates the number of students that would be generated by the Proposed Project and other cumulative development by using IUSD student generation factors, and focuses on whether IUSD school facilities expected to serve the Proposed Project and other cumulative development would have sufficient available capacity to accommodate these students.

The IUSD student generation factors were provided by the Inglewood Unified School District Residential Development School Fee Justification Study, Table 5, Adjusted Student Generation Factors, dated May 17, 2018, prepared by Cooperative Strategies, and the Inglewood Unified School District Commercial/Industrial Development School Fee Justification Study, Table 10, Average Student Generation Impacts per 1,000 Square Feet CID, dated May 17, 2018, prepared by Cooperative Strategies.

Current and projected enrollment/capacities use the 2017/2018 school year as representative of existing conditions. The student enrollments were obtained from the California Department of Education. As described above, projected student enrollment from the HPSP Adjusted Baseline development is added to existing conditions to create the Adjusted Baseline which is used as the baseline for impact analysis.

The analysis addresses all levels of education facilities operated by the IUSD (i.e., elementary schools, middle schools, and high schools), and focuses on the schools that would serve the Project Site and other cumulative development. It also addresses state regulations, e.g. SB 50, and cumulative development fees as a mechanism for providing new school facilities and addressing school impacts of the Proposed Project and other cumulative development. A determination is then made as to whether the IUSD would require new or physically altered facilities for schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.

Impacts and Mitigation Measures

Impact 3.13-11: Implementation 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. (Less than Significant)

Construction

The nearest schools to the Proposed Project are the Worthington Elementary School at 11101 Yukon Avenue, located approximately 0.80 miles southeast of the Project Site; Woodworth (Clyde) Elementary School at 3200 West 104th Street, located approximately 0.83 miles southeast

of Project Site; Monroe (Albert F.) Middle School at 10711 10th Avenue, located 0.90 miles southwest of the Project Site; and Morningside High School at 10500 South Yukon Avenue, located 0.50 miles southeast of Project Site.¹⁰⁰ Project-related construction vehicles would primarily use ~~major arterials designated truck routes~~ in the vicinity of the Project Site including, but not limited to, ~~West Manchester Avenue, West Century Boulevard, Hawthorne Boulevard, South Prairie Avenue, South Doty Avenue, Yukon Avenue~~ ~~102nd Street between Prairie and Yukon Avenues,~~ and Crenshaw Boulevard. ~~None of the nearby schools are located on these designated truck routes, and thus any construction truck use of streets adjacent to these schools would be intermittent and infrequent.~~ Project-related construction traffic, lane closures, and construction-related activities, including delivery of construction materials, would not affect school access or student pick-up/drop off. As such, project construction would not adversely affect the schools resulting in physical effects.

Construction of the Proposed Project would require the participation of a large number of construction employees who would be hired from a mobile regional construction work force that moves from project to project. Proposed Project construction workers with various skills work on the Proposed Project on an intermittent basis as their particular trades are required. As described in Chapter 2, Project Description, Table 2-5, construction phases at the Project Site would range from a few weeks to approximately 18 months, and would involve construction worker teams ranging from a couple dozen to several hundred depending on phase (see Chapter 2, Project Description, Table 2-6).

Given the mobility and limited durations of work on the Project Site, and a large construction labor pool that can be drawn upon from throughout the Los Angeles region, it is not reasonably expected that construction employees would relocate their place of residence, or the schools in which their children are enrolled within this region or from other regions as a result of their work on the Proposed Project. Accordingly, Project construction would not result in an increase in the resident population or generate new students needing to attend local schools. Therefore, construction of the Proposed Project would not create a need for new or physically altered schools, the construction of which would result in substantial adverse environmental impacts. Therefore, construction impacts on schools would be **less than significant**.

Operation

The Proposed Project would not involve the development of residential uses that could generate new student enrollment. Also, the Proposed Project would not remove existing residential uses or a school site, and therefore would not reduce the student population or availability of school facilities.

The Proposed Project would employ a total of 439 existing and future permanent employees. The number of event-related employees required, and the types of services provided, for an event hosted at the Arena Structure would vary depending on the type and size of event. The highest

¹⁰⁰ Distances are measured from the center of the Arena Site.

number of event-related employees would be required to support an LA Clippers home basketball game, approximately 1,320 employees, which includes approximately 120 LA Clippers business operations support employees who would also work at LA Clippers games.

It is possible that a small number of permanent or event-related Project employees would request that their children be enrolled into an IUSD school near the Project Site. As discussed above, the Superintendent or designee may approve an inter-district attendance permit for a student for parent employment reasons.

Table 3.13-89 presents the estimated number of students generated by the Proposed Project. As shown in Table 3.13-89, the Proposed Project is expected to generate approximately 27 elementary school students, 10 middle school students, and 13 high school students for a total net increase of 50 students attending Project area schools over existing conditions. ~~This analysis is conservative as it applies the student-generation rates to the event-related employees in addition to the permanent employees.~~ Furthermore, a portion of the Project’s generated school-aged children may attend private, charter, or magnet schools, which would reduce attendance at IUSD schools. For these reasons, the above analysis is considered conservative and likely overestimates the Proposed Project’s actual potential to generate new students.

TABLE 3.13-89
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROPOSED PROJECT

Land Use	Development	Units	Generation Factors ^a	Elementary School	Middle School	High School	Total ^g
Proposed Uses							
Arena ^b	915,000	sq. ft.	0.0203/1,000sf	19	8	8	Total: 35
			0.0083/1,000sf				
			0.0082/1,000sf				
LA Clippers Office Space ^c	71,000	sq. ft.	0.0317/1,000sf	2	1	1	Total: 4
			0.0129/1,000sf				
			0.0128/1,000sf				
LA Clippers Team Practice and Training Facility ^c	85,000	sq. ft.	0.0317/1,000sf	3	1	1	Total: 5
			0.0129/1,000sf				
			0.0128/1,000sf				
Sports Medicine Clinic ^d	25,000	sq. ft.	0.0252/1,000sf	1	0	1	Total: 2
			0.0102/1,000sf				
			0.0102/1,000sf				
Commercial Uses ^b	48,000	sq. ft.	0.0203/1,000sf	1	0	2	Total: 3
			0.0083/1,000sf				
			0.0082/1,000sf				

Land Use	Development	Units	Generation Factors ^a	Elementary School	Middle School	High School	Total ^g
Hotel Uses ^e	49,500 ^f	sq. ft.	0.0103/1,000sf 0.0042/1,000sf 0.0041/1,000sf	1	0	0	Total: 1
Total Proposed Project				27	10	13	50

NOTES:

- ^a Calculated by multiplying each of the proposed uses by its respective student generation rates. Student generation rates are taken from the Inglewood Unified School District Commercial/Industrial Development School Fee Justification Study, Table 10, Average Student Generation Impacts per 1,000 Square Feet CID, page 21, prepared by Cooperative Strategies, dated May 17, 2018. Retail and Services per 1,000 sq. ft. = 0.0203 for elementary school; 0.0083 for middle school; and 0.0082 for high school. Office per 1,000 sq. ft. = 0.0317 for elementary school; 0.0129 for middle school; and 0.0128 for high school. Hospital per 1,000 sq. ft. = 0.0252 for elementary school; 0.0102 for middle school; 0.0102 for high school. Hotel/Motel per 1,000 square feet = 0.0103 for elementary; 0.0042 for middle school; and 0.0041 for high school.
- ^b Retail and services generation rates were used.
- ^c Office generation rates were used.
- ^d Hospital generation rates were used.
- ^e Hotel/motel generation rates were used.
- ^f The Proposed Project would include a hotel with up to 150 guest rooms. According to USAToday, the average hotel room is approximately 330 square feet including a full bathroom. Source: <https://www.usatoday.com/story/travel/roadwarriorvoices/2015/11/04/hotel-rooms-20-years-ago-were-twice-as-large-as-some-of-todays-offerings/83847338/>, accessed January 2019. 150 hotel rooms X 330 square feet = 49,500 square feet of hotel uses.
- ^g Rounded to the nearest whole number.

SOURCE: Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies, available at https://www.iusd.net/wp-content/uploads/2018/05/FISJD_Inglewood_FN.pdf, accessed January 2019; and ESA, 2019.

As described above in **Table 3.13-67**, under the Adjusted Baseline the IUSD has capacity to accommodate up to 486 elementary students, 971 middle school students, and 43 high school students. As shown below in **Table 3.13-910**, under the Adjusted Baseline, there is sufficient capacity to accommodate all students within existing capacities at each school level. As such, implementation of the proposed project would not result in overcrowding at any school level, and thus there would be no need for the construction of new school facilities to meet the demands of enrollment associated with the Proposed Project.

TABLE 3.13-910
ADJUSTED BASELINE ENVIRONMENTAL SETTING SCHOOL FACILITIES CAPACITY AND STUDENT ENROLLMENT WITH PROJECT

IUSD School Level	2017-2018 Facilities Capacity ^{a,b}	2017-2018 Adjusted Baseline Student Enrollment ^c	2017-2018 Adjusted Baseline Excess/ (Shortage) Capacity	Project-Generated Students	Projected Student Enrollment for 2017-2018 Adjusted Baseline With Project	Projected Seating Excess/ (Shortage) for 2017-2018 Adjusted Baseline With Project
Elementary School (Grades K-5)	5,247	4,761	486	27	4,788	459
Middle School (Grades 6-8)	2,873	1,902	971	10	1,912	961
High School (Grades 9-12)	2,079	2,036	43	13	2,049	30

NOTES:

- ^a 2017-2018 is the most recent school year information available.
- ^b Capacity based on classroom utilization information provided by the IUSD in the Inglewood Unified School District Commercial/Industrial Development School Fee Justification Study.

^c 2017-2018 student enrollment provided by the California Department of Education.

SOURCE: Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies. Available: [HYPERLINK "https://www.myiUSD.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf"]; and California Department of Education website, 2017-2018 data, [HYPERLINK "https://www.cde.ca.gov/ds/sd/sd/filesenr.asp"], accessed March 2019.

Pursuant to Section 65995 of the California Government Code, the Proposed Project would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new or improved school facilities, irrespective of whether schools serving the Proposed Project in question are at capacity. Pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's impacts related to overcrowding and enrollments at school facilities under CEQA.¹⁰¹

Overall, operation of the Proposed Project would not create a demand for schools that would result in the need for new or physically altered school facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, impacts on schools would be **less than significant**.

Mitigation Measures

None required.

Cumulative Impacts

The geographic context for analysis for cumulative impacts related to schools includes those past, present, and reasonably foreseeable cumulative projects located within the boundaries of the IUSD. Of the 146 cumulative projects on the Cumulative Projects List presented in Chapter 3.0, Section 3.0.5, Table 3-2, a total of 32 (Cumulative Projects ~~42-52, 54 through 773, and 118~~) are located within the attendance boundaries of the IUSD. The development of the 32 cumulative projects located in the City of Inglewood is anticipated to result in construction of 3,055 residential units, 417,559 sf of commercial uses, 451,923 sf of retail uses, 1,640 of restaurant uses, 3,567,314 sf of office uses, ~~424-304~~ hotel rooms, 25,500 sf of schools uses, 30,000 sf of civic center uses, and approximately 13 acres of open space.

These cumulative projects located within the IUSD boundaries are included in Table 3.3-~~1011~~.

¹⁰¹ Government Code Section 65995(h) states in part: "The payment or satisfaction of a fee ... specified in Section 65995 ... are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property ... on the provision of adequate school facilities.

Impact 3.13-12: Implementation of the Proposed Project, in combination with related cumulative projects, 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. (Less than Significant)

Construction

As described under Impact 3.13-11, schools in the vicinity of the Project Site are not located on City of Inglewood designated truck routes. As with the Proposed Project, construction vehicles for cumulative projects would primarily use designated truck routes including, but not limited to, Manchester Avenue, Century Boulevard, Hawthorne Boulevard, South Prairie Avenue, 102nd Street between South Prairie and Yukon Avenues, and Crenshaw Boulevard. None of the nearby schools are located on these designated truck routes, and thus any construction truck use of streets adjacent to these schools would be intermittent and infrequent. Construction activities associated with the 32 cumulative projects located within the IUSD boundaries would not adversely affect IUSD schools resulting in physical effects. Project-related construction traffic, lane closures, and construction-related activities, including delivery of construction materials, would not affect school access or student pick-up/drop off.

As described above under Impact 3.13-11, construction activities are not expected to result in an increase in the resident population or generate students needing to attend local schools. The construction of the Proposed Project in combination with construction of other cumulative development would not generate a new material demand for schools that could require construction of new facilities that could adversely affect the environment. Because construction of the 32 related cumulative projects, in combination with construction of the Proposed Project, this cumulative impact would be **less than significant**.

Operation

Operation of the Proposed Project, combined with the operations of past, present, and reasonable future projects, could increase the number of students seeking to enroll in IUSD schools. Of the 146 cumulative projects, 32 are located within the attendance boundaries of the IUSD.

Table 3.13-1011, presents the estimated students that would be generated by the cumulative projects located within the IUSD. Similar to the Proposed Project, the number of students anticipated to be generated by the cumulative projects was estimated based on the type of development proposed.

**TABLE 3.13-1011
 ESTIMATED NUMBER OF STUDENTS GENERATED BY CUMULATIVE DEVELOPMENT**

Map No. ^a	Address	Project Development Characteristics	Elementary School ^{b,c}	Middle School ^{b,c}	High School ^{b,c}
42	664 E. Manchester Terrace	4 condominiums	0.5	0.2	0.2
43	844 N. Centinela Avenue	4 apartments	0.5	0.2	0.2
44	501 E. 99th Street	12 condominiums	1.6	0.6	0.6

TABLE 3.13-1011
ESTIMATED NUMBER OF STUDENTS GENERATED BY CUMULATIVE DEVELOPMENT

Map No. ^a	Address	Project Development Characteristics	Elementary School ^{b,c}	Middle School ^{b,c}	High School ^{b,c}
45	921 N. Edgewood Street	38 apartments	5.0	2.1	2.0
46	222 W. Spruce Avenue	10 apartments	1.3	0.5	0.5
47	961 E. 68th Street	3 condominiums	0.4	0.2	0.2
48	417 N. Market Street	12 condominiums	1.6	0.6	0.6
49	819 E. La Palma Drive	5 apartments	0.7	0.3	0.3
50	814 N. Market Street	18 bed congregate living facility	0	0	0
51	411 E. Hazel Street	18 apartments	2.4	1.0	1.0
52	329 E. Hazel Street	4 condominiums	0.5	0.2	0.2
54	3920 W. 108th Street	3 apartments	0.4	0.2	0.2
55	125 E. Spruce Avenue	7 apartments	0.9	0.4	0.4
56	704 N. Market Street	12 apartments	1.6	0.6	0.6
57	408 E. Warren Lane	2,542 sf commercial	0.1	0.0	0.0
58	508 S. Eucalyptus Avenue	40-unit senior affordable housing development	0.1	0.0	0.0
59	417-433 Centinela Avenue	116 apartments	15.3	6.3	6.2
60	721 N. La Brea Avenue	1,312 sf commercial, -1,210 sf commercial	0.0	0.0	0.0
61	101, 125, 139, 140, 150 Market Street	40,000 sf retail	0.8	0.3	0.3
62	113-133 Plymouth Street	20 townhomes	2.6	1.1	1.1
63	333 N. Prairie Avenue	310 townhomes	40.8	16.7	16.6
64	705-715 N. Centinela Avenue	81,613 sf self-storage	0.0	0.0	0.0
65	3660 W. 107th Street	3 dwelling units	0.4	0.2	0.2
66	614 E. Hyde Park Boulevard	18-bed congregate living facility	0.0	0.0	0.0
67	1050 S. Prairie Avenue	371,923 sf retail; 3,567,314 sf office; 2,186 residential units; 300-room hotel; 13.07 acres open space/park.	409.3	167.6	165.8
68	D3 Site (La Brea Avenue/Florence Avenue)	243 apartments, 40,000 sf retail	32.8	13.5	13.3
69	101 S. La Brea	Philharmonic Association 25,500 sf	0.5	0.2	0.2
70	316 Hardy Street	5 condominiums	0.7	0.3	0.3
71	943-959 W. Hyde Park Boulevard	159,498 sf 5-story self-storage facility	0.1	0.0	0.0
72	8911 Aviation Boulevard	173,804 sf car rental	3.5	1.4	1.4
73	3900 W. Century Boulevard	4-hotel rooms	0.00	0.20	0.20
118	5301 W. Centinela Avenue	1,640 sf restaurant	0.1	0.0	0.0
Subtotal Cumulative Projects^d			525	215	213
Proposed Project			27	10	13

TABLE 3.13-1011
ESTIMATED NUMBER OF STUDENTS GENERATED BY CUMULATIVE DEVELOPMENT

Map No. ^a	Address	Project Development Characteristics	Elementary School ^{b,c}	Middle School ^{b,c}	High School ^{b,c}
Total^d			552	225	226

NOTES:

- ^a Corresponds with Map Nos. on Figure 3.0-2 of this Draft EIR.
- ^b Calculated by multiplying each of the proposed uses by its respective student generation rates. Student generation rates are taken from the Inglewood Unified School District Residential Development School Fee Justification Study, Table 5, Adjusted Student Generation Factors, page 11, prepared by Cooperative Strategies, dated May 17, 2018. Multi-family attached units = 0.1316 for elementary school; 0.0540 for middle school; and 0.0534 for high school.
- ^c Calculated by multiplying each of the proposed uses by its respective student generation rates. Student generation rates are taken from the Inglewood Unified School District Commercial/Industrial Development School Fee Justification Study, Table 10, Average Student Generation Impacts per 1,000 Square Feet CID, page 21, prepared by Cooperative Strategies, dated May 17, 2018. Retail and Services per 1,000 sq. ft. = 0.0203 for elementary school; 0.0083 for middle school; and 0.0082 for high school. Office per 1,000 sq. ft. = 0.0317 for elementary school; 0.0129 for middle school; and 0.0128 for high school. Hotel/Motel per 1,000 square feet = 0.0103 for elementary; 0.0042 for middle school; and 0.0041 for high school. Self-Storage per 1,000 square feet = 0.0006 for elementary; 0.0002 for middle school; and 0.0002 for high school.
- ^d Rounded to the nearest whole number.

SOURCES: Inglewood Unified School District, *Residential Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies. Available: https://www.mysud.net/wp-content/uploads/2018/05/FJStudy_Res_Inglewood_FN.pdf. Accessed January 2019; and Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies. Available: https://www.mysud.net/wp-content/uploads/2018/05/FJStudy_CID_Inglewood_FN.pdf. Accessed January 2019; and ESA 2019.

As shown in **Table 3.13-1012**, the cumulative projects are expected to generate approximately 525 elementary school students, 215 middle school students, and 213 high school students. With the addition of student enrollment that could be generated by the Proposed Project, cumulative student enrollment could therefore increase by 552 elementary school students, 225 middle school students, and 226 high school students. This analysis is conservative as a portion of the Proposed Project's and cumulative projects' generated school-aged children may attend public schools in other districts, charter, or private schools, which would reduce attendance at IUSD schools.

TABLE 3.13-1112
SCHOOL FACILITIES CAPACITY AND STUDENT ENROLLMENT WITH PROJECT PLUS CUMULATIVE DEVELOPMENT

IUSD School Level	2017-2018 Facilities Capacity ^{a,b}	Adjusted Baseline Student Enrollment ^c	Adjusted Baseline Capacity (Shortage)	Project + Cumulative Generated Students	Projected Student Enrollment for Adjusted Baseline + Project + Cumulative	Projected Seating Capacity (Shortage) for Adjusted Baseline + Project + Cumulative
Elementary School (Grades K-5)	5,247	4,761	486	552	5,313	(66)
Middle School (Grades 6-8)	2,873	1,902	971	225	2,127	746
High School (Grades 9-12)	2,079	2,036	43	226	2,262	(183)

NOTES:

- ^a 2017-2018 is the most recent school year information available.

- ^b Capacity based on classroom utilization information provided by the IUSD in the Inglewood Unified School District Commercial/Industrial Development School Fee Justification Study.
- ^c 2017-2018 student enrollment provided by the California Department of Education.

SOURCE: Inglewood Unified School District, *Commercial/Industrial Development School Fee Justification Study*, dated May 17, 2018, prepared by Cooperative Strategies, available at [HYPERLINK "https://www.myiUSD.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf"]; and California Department of Education website, 2017-2018 data, [HYPERLINK "https://www.cde.ca.gov/ds/sd/sd/filesenr.asp"], accessed March 2019.

As shown in ~~Table 3.13-11-12~~ above, under cumulative conditions, the IUSD would have sufficient capacity for middle school students, but would have a small shortfall in capacity for elementary school students (66) and a more material shortfall in spaces for high school students (183). In the event that these shortfalls materialize, they are relatively small in comparison to the design capacity of either an elementary or high school, and would most likely be addressed through school class size adjustments or the addition of portable classrooms on existing school properties, and would not involve significant environmental impacts that can be associated with new school construction.

As discussed above, in recent years the IUSD has experienced declining student enrollment, changing demographics, challenging socioeconomic conditions for families, a drop in school funding, and the expansion of charter schools. Overall, year-to-year annual student enrollment in the IUSD has steadily declined while enrollment in area charter schools has slightly increased. ~~Over recent~~Over the last 4 school years, IUSD enrollment has decreased by nearly ~~500-1,700~~ students, and is projected to decline by another 950 students over the next two years per year. Should those ~~recent trends continue~~expected decreases in enrollment occur, there would be sufficient space available for all students that would be generated by the Proposed Project plus cumulative development.

As described previously, pursuant to Section 65995 of the California Government Code, the Proposed Project and all cumulative projects would be required to pay IUSD fees in accordance with SB 50. Based on current fees, the ~~cumulative development of 3,055 residential units, 417,559 sf of commercial uses, 451,923 sf of retail uses, 1,640 sf of restaurant uses, 3,567,314 sf of office uses, 424-304~~ hotel rooms would generate approximately \$2.5 million in fees to the IUSD. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, or expansion and/or improvement of existing schools. Pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's impacts related to school facilities under CEQA.

For the reasons described above, cumulative development, including the Proposed Project, would not result in the need for the construction of new, or expanded school facilities, the construction of which could cause significant environmental impacts, in order to maintain performance objectives. Therefore, this cumulative impact would be **less than significant**.

Mitigation Measures

None required.