

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 environmental setting for public services; (2) a description of the Adjusted Baseline 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.

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

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 58 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 167 fire stations, 9 wildland fire camps, and 159 lifeguard towers and includes 113 paramedic squads/units and 9 helicopters (includes three paramedic air squads/fireships). LACFD staff consists of 4,631 total emergency responders and business professionals, including 3,157 firefighters, who are also trained in infectious disease

response, and 748 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, Gardena, Lawndale, and within the unincorporated communities of West Athens, Lennox, and Baldwin Hills. The Battalion 20 Headquarters is located within Fire Station 171 at 141 W. Regent Street, Inglewood.⁴

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 and Transportation Hub 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.

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, 2 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 August 2018.

¹ Los Angeles County Fire Department, Strategic Plan, Annual Report, 2013-2015, <http://www.fire.lacounty.gov/wp-content/uploads/2016/02/LACoFD-Annual-Report-2013-15-web.pdf>. Accessed August 2018.

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

³ Los Angeles County Fire Department, Strategic Plan, Annual Report, 2013-2015, <http://www.fire.lacounty.gov/wp-content/uploads/2016/02/LACoFD-Annual-Report-2013-15-web.pdf>. Accessed August 2018.

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.

As shown in Table 3.13-1 and Figure 3.13-1, three fire stations are located within 1.5 miles of the Project Site.⁵ Fire Station 170, located at 10701 S. Crenshaw Boulevard, is the jurisdictional station for the Project Site and is the first due-in fire station, which is the fire station with primary responsibility for the Project Site. [Note to City: Information to come about specialized equipment available at Fire Station 170.] Fire Station 170 is located approximately 1.3 miles southeast from the Project Site. Fire Station 18 at 4518 W. Lennox Boulevard, would be the second due-in fire station, which is located approximately 1.3 miles southwest of the Project Site. Fire Station 173 at 9001 S. Crenshaw Boulevard, would be the third due-in fire station, which is located approximately 1.5 miles southeast of the Project Site. Additionally, Fire Stations 162, 171, 161, and 172 are all located within approximately 2.5 miles of the Project Site.⁶

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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.⁷

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. 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.⁸ According to the LACFD, Fire Station 170 is estimated to have an emergency average response time of five minutes to the Project Site, and therefore is currently meeting the response time guidelines of the LACFD.⁹

⁵ Approximate drive distance was measured from the approximate center of the Arena Site.

⁶ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018.

⁷ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018.

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 October 25, 2018.

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.
- 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 ~~five-six~~ of the parcels that make up the Project Site are currently vacant ~~or undeveloped~~. The ~~five-six~~ developed parcels include a fast food restaurant, a motel, ~~a light manufacturing/warehouse and light manufacturing facilities 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 103rd Street, South Prairie Avenue, and South Doty Avenue.¹⁰

The existing structures 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 and Transportation Hub 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.

¹⁰ Golden State Water Company, Will Serve Letter for 17 Acres Development between Century Blvd to the north, 103rd Street to the south, Prairie Ave to the west and Doty Ave to the east, dated November 13, 2017.

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. According to the LACFD, the existing fire flow parameters of these existing water infrastructure and fire hydrants are X. **[Need LACFD to provide.]**

3.13.2 Adjusted Baseline

As discussed in Section 3.0, the Proposed Project is not anticipated to be constructed and begin operations until mid-2023 for the 2023-24 NBA basketball season. Also as discussed in Section 3.0, the City has issued building permits for, and construction has commenced on, significant portions of the Hollywood Park Specific Plan, including the construction of the 70,000-seat NFL Stadium, a 6,000-seat performance venue, 518,077 square feet of retail and restaurant uses, 466,000 square feet of office space, 314 residential units, approximately 9,900 parking spaces, and a 11.89-acre park resulting in an estimated 942 residents¹¹ and 2,948 full-time employees.¹² Due to the certainty of these projects being constructed and in operation prior to opening of the Proposed Project, the City of Inglewood determined that it is appropriate to include these projects in an Adjusted Baseline. Accordingly, the changes associated with these developments within the Hollywood Park Specific Plan area are considered as part of the adjusted environmental baseline. The construction and operation of the aforementioned portions of the Hollywood Park Specific Plan would result in additional structures and population (residents, patrons/attendees, and employees), thus creating an additional demand for fire protection services and emergency medical services.

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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.¹³ The 2016 CBC standards ~~are~~ based on a combination of ~~the~~ building standards that have been adopted by State agencies

¹¹ Using a factor of 3.0 residents per household. City of Inglewood, 2008. Hollywood Park Redevelopment Project Draft EIR. Page IV.H-31, Table IV.H-8. October.

¹² Using employment generation factors from City of Inglewood, 2008. Hollywood Park Redevelopment Project Draft EIR. Page IV.H-16, Table IV.H-5. October.

¹³ California Building Standards Commission, 2016 California Building Code, California Code of Regulations, Title 24, Part 2, Volumes 1 and 2, <http://www.bsc.ca.gov/Codes.aspx>, accessed August 2018.

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.¹⁴ 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 emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hosing sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance and use of all firefighting and emergency medical equipment.

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Local

Los Angeles County Fire Department Strategic Plan 2017-2021

The 2017-2021 LACFD Strategic Plan (Strategic Plan)¹⁵ 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.

¹⁴ California Building Standards Commission, 2016 California Fire Code, California Code of Regulations, Title 24, Part 9, <http://www.bsc.ca.gov/Codes.aspx> and <http://www.citymb.info/home/showdocument?id=28089>. Accessed August 2018.

¹⁵ Los Angeles County Fire Department, Strategic Plan, 2015-2017 and the Strategic Plan Accomplishments 2015-2017, <http://www.fire.lacounty.gov/wp-content/uploads/2016/03/Strategic-Plan-2015-17-final-small-file.pdf>, and <https://www.fire.lacounty.gov/wp-content/uploads/2017/09/LACoFD-Strategic-Accomplishments-2015-2017.pdf>. Accessed August 2018.

Los Angeles County 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

The 2017 LACFD Developer Fee Detailed Fire Station Plan (Plan)¹⁶ 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 ~~provided that development occurs as expected~~. The anticipated costs identified in the Plan will be funded by developer fee revenues or funds which the Fire District has advanced from other sources. These advances will be repaid to the Fire District when sufficient developer fee revenue is generated.

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

The Los Angeles County, Title 32, Fire Code,¹⁷ 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, ~~and abatement of~~ combustible brush and vegetation that represents an imminent fire hazard, debris abatement, combustible storage abatement including flammable liquid storage, 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,¹⁸ 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

¹⁶ Los Angeles County Fire Department, 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, September 2017, adopted by Board of Supervisors County of Los Angeles November 28, 2017, <http://file.lacounty.gov/SDSInter/bos/supdocs/117857.pdf>. Accessed August 2018.

¹⁷ Los Angeles County Code, A Codification of the General Ordinances of Los Angeles County, California, Title 32, Fire Code, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT32FICO. Accessed August 2018.

¹⁸ City of Inglewood Municipal Code, Chapter 6, Fire Prevention, <https://www.qcode.us/codes/inglewood/>. Accessed August 2018.

proposed implementation techniques. It provides a framework upon which the development of public and privately owned land can be based.¹⁹

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.²⁰

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 LACFD. Further, the Proposed Project would generate revenue for 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. 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 interpret City goals and policies to determine if the Proposed Project is consistent or inconsistent with the City of Inglewood General Plan.

¹⁹ City of Inglewood General Plan, Land Use Element, updated 2016, Available: <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>. Accessed November 2018.

²⁰ City of Inglewood General Plan, Safety Element, adopted July 1995, Available: <https://www.cityofinglewood.org/DocumentCenter/View/126/Safety-Element-1995-PDF>. Accessed August 2018.

3.13.4 Analysis, Impacts and Mitigation

Significance Criteria

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 833,²¹ 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.”].) 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 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

²¹ Court of Appeal of the State of California, First Appellate District, Division Three, Filed 11/30/15; *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*, <http://law.justia.com/cases/california/court-of-appeal/2015/a131412a.html>. Accessed October 2018.

use or store hazardous materials. The proposed closure of portions of West 101st and West 102nd Streets is ~~also considered in part of~~ the analysis.

As a step in this analysis, the LACFD was consulted 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 and Project Site ~~conditions~~ are discussed in Section 3.8, Hazards and Hazardous Materials. The letter of correspondence with the LACFD is contained in the Draft EIR Appendix X.

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Impacts and Mitigation Measures

Impact 3.13-1: Implementation of the Proposed Project ~~could~~ would not 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.

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 ~~including potential injury to construction workers, and construction-related traffic congestion~~, as discussed further below.

Response to Construction Worker 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. Construction workers performing activities associated with the demolition of the existing on-site structures and construction of the Proposed Project could be exposed to risks that could require fire protection and emergency medical services. Construction worker accidents could result from occasional exposure 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.

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 of 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 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.

Obstruction of Fire or Emergency Response

Construction staging, including material stockpiling and equipment storage, would occur within the Project Site boundaries. Nevertheless, construction-related traffic on adjacent streets could potentially create obstacles for emergency responders that could affect emergency response times to the Project Site and neighboring uses.

Construction activities for development would involve temporary lane closures. During construction of the Arena Site, the easternmost travel lane of northbound South Prairie Avenue may be fenced and closed to travel from West 103rd Street to West Century Boulevard, except that the City would require driveway access to the residences at 10204 South Prairie Avenue and 10226 South Prairie Avenue to be maintained for the duration of construction of the Proposed Project. The southernmost lane on eastbound West Century Boulevard also may be closed to traffic adjacent to the Arena Site, from South Prairie Avenue for approximately 450 feet east to a location in front of the Airport Park View Hotel, as well as along the frontage of the West Parking and Transportation Hub Site. It is not anticipated that construction on the East Parking and Hotel Site would require closure of the south lane on eastbound West Century Boulevard, and it is not anticipated that lanes on north or southbound South Prairie Avenue would be required to be closed during construction on the Arena Site or West Parking and Transportation Hub Site.

Commented [A7]: The second sentence in this paragraph says that northbound S. Prairie Ave. may be fenced and closed to travel during Arena Site construction.

Fire Station 170 (the first due-in station) is estimated to have an emergency average response time of five minutes to the Project Site, and therefore meets the response time guidelines of the LACFD. According to the LACFD, response times from Fire Station 170 and other fire stations to the Project Site and project vicinity would not be increased due to the proposed temporary lane closures during construction. **[Need LACFD to confirm.]**

If Fire Station 170 is unable to respond in a timely manner, or if the size of emergency requires additional response, resources from other fire stations would be directed to the site. Depending on the station that responds and the background traffic conditions during a specific time of day, lane closures combined with construction-related traffic could result in increased travel time for fire and emergency responders due to increased congestion as a result of reduced road capacity, or flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could temporarily increase response times for emergency vehicles to local business and/or residences within the vicinity of the Project Site.

The significance of any effects on response time would be less substantial because impacts of such construction activity would be temporary (not more than three years of construction). Further, truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the City of Inglewood Public Works Department prior to construction activities, and these routes would be set by the City so as to create minimal traffic and access-related effects.

As discussed in Section 3.14, Transportation and Circulation, a Construction Management Plan would be prepared by the project applicant and approved by the City's Department of Public Works. The intent of the Construction Management Plan would be to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. For lane and sidewalk closures, a worksite traffic control plan would be implemented to route traffic or pedestrians around any such lane or sidewalk closure. The Construction Management Plan would be prepared for review and approval by the City of Inglewood Public Works Department prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic, are expected to limit the potential for significant delays in emergency response times during construction of the Proposed Project.

As described above, no evidence exists to suggest that construction of the Proposed Project would increase demand or response times such that a need for new or physically altered facilities for the provision of fire protection facilities and emergency medical services is created. Therefore, potential impacts on fire protection and emergency medical services due to construction activity would be **less than significant**.

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 size of a project, uses proposed, operational-related traffic congestion, number of people who intermittently or permanently occupy the Project Site, 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. According to the LACFD, there are no planned improvements in the immediate area of the Project Site or Project area.²²

Population Effects on Demand

The Proposed Project would result in an increased population at the Project Site and project vicinity comprised of patrons attending LA Clippers home games and other events such as concerts, conventions, family shows, corporate/community events, plaza events and other events

²² Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018.

at the proposed Arena Structure; employees of the LA Clippers; 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. 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-day 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 full concert capacity of 18,500 attendees. Intermittent increases in pedestrian activity and population density 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 at the proposed Arena Structure, could result in periodic increases in demand for fire protection and emergency medical services from the LACFD compared to baseline conditions.

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 Project's fire safety features would include the installation of automatic fire sprinkler systems, smoke detectors, fire extinguishers, a fire alarm system, building emergency communication system and smoke control system, and appropriate signage and internal exit routes to facilitate a building evacuation if necessary.

The Proposed Project would include the implementation of an Emergency Plan that would establish dedicated personnel and emergency procedures to assist the LACFD during an emergency incident; establish a drill procedure to prepare for emergency incidents; establish 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; and establish procedures to be followed during an emergency incident to reduce impacts on the increased need for emergency medical services.

As part of the Proposed Project, two locations within the Arena Structure would be used by the LACFD, Inglewood PD, and/or the Arena Structure'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 Fire Department 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 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 building within the West Parking and Transportation Hub site. As discussed above, the estimated response time to the Project Site from Fire Station 170 meets the 5-minute response time guidelines of the LACFD. According to the LACFD, response times from Fire Station 170 and other fire stations to the Project Site and project vicinity would not be increased due to these proposed street vacations. **[Need LACFD to confirm.]**

With incorporation of building design, fire safety features, emergency safety provisions, LACFD access, construction measures, water system improvements, and hydrant spacing,²³ 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.

Traffic Effects on Response Time

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.

²³ Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, letter correspondence dated October 25, 2018. (Draft EIR Appendix)

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 within the vicinity of the Project Site. According to the LACFD, the existing fire flow parameters of these fire hydrants are ~~X~~. **[Need LACFD to provide information about current flows.]**

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 and Transportation Hub 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.

The Proposed Project would include seven new private, on-site fire hydrants along the proposed internal roadway and three new public fire hydrants along South Prairie Avenue and West Century Boulevard for the Arena Site. In addition, the Propose Project would include two private, on-site fire hydrants along the westerly edge of the West Parking and Transportation Hub 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 gallons per minute (gpm).²⁴According to the LACFD, through the 16 existing public fire hydrants, ~~the 3 proposed new public fire hydrants~~, and the 9 proposed private fire hydrants, there would be adequate capacity to the meet the estimated fire flow demand of the Proposed Project. **[Need LACFD to confirm.]** 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.

Commented [A8]: This is what the paragraph above says, but should be confirmed.

Overall, as discussed above, operation of the Proposed Project 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

²⁴ Henrik Nazarian, PE, President, D&D Engineering, Inc., email correspondence dated November 7, 2018.

order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency medical services. Therefore, the Proposed Project's impacts on fire protection, facilities, and emergency medical services during 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 fire protection and emergency medical services includes those past, present, and reasonably foreseeable cumulative projects located within the service areas of the LACFD. The scope is further defined by those cumulative projects within the fire station 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.). Projects located in other fire protection jurisdictions would be primarily served by their respective fire stations.

Impact 3.13-2: Implementation of the Proposed Project, in combination with other past, present, and future development, ~~could~~ would not 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.

Construction

As 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 ~~the list of all 130~~ cumulative projects in Appendix ~~.....~~. Of these ~~130~~ ~~cumulative projects~~, 37 projects are located within the City of Inglewood and are within the fire station 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 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.

Commented [A9]: Consider moving Tables to Appendices and summarize the key information—this is a lot of detail for the main text.

In compliance with the Cal OSHA and fire building requirements of the City's Fire Code, all construction personnel 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 required, construction management plans would

be prepared, by the project applicants and approved by the City’s Department of Public Works. 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. The Proposed Project in combination with other cumulative development, 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. Therefore, construction of the Proposed Project, along with the construction of past, present, and reasonably future projects, would not have a **less than significant** cumulative impact on fire protection and emergency medical services.

Operations

As discussed above, the LACFD provides services to a population of over four million residents living and working in 58 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 130 cumulative projects. The development of the 130 cumulative projects consists of approximately 11,666 residential units, 2,201,145 square feet of commercial uses, 10,882,946 square feet of office uses, 652,282 square feet of industrial/warehouse uses, 14 hotels consisting of approximately 2,353 hotel rooms, 470,905 square feet of school uses, 7,000 square feet of medical/dental uses, 13,316 square feet of religious uses, a MTA bus facility, 645,000 square feet of community/civic center uses, 1,634,329 square feet of open space. Of these 130 cumulative projects, 37 projects are located within the City of Inglewood and are within the fire station service areas of the same three LACFD fire stations that would primarily serve the Proposed Project (e.g., Fire Station 170, the first due-in station; Fire Station 18, the second due-in station; and Fire Station 173, the third due-in station); refer to Table 3.13-2.

Fire Station 170 would provide fire protection and emergency medical services to 19 cumulative projects; Fire Station 18 would provide service 32 cumulative projects; and Fire Station 173 would service 32 cumulative projects. The development of these 37 cumulative projects located within the fire station service areas Fire Stations 170, 18, and 173 consists of approximately 3,358 residential units, 642,578 square feet of commercial uses, 3,566,314 square feet of office uses, 723 hotel rooms, and 569,329 square feet of open space. Operation of the Proposed Project, along with the operations of past, present, and reasonable future projects, could have a potential significant impact on 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)
41	664 E. Manchester Terrace	Inglewood	Four (4) new residential condominiums	FS 173 (1.1), FS 18 (1.8), FS 170 (1.9)
42	844 N. Centinela Avenue	Inglewood	Four (4) new residential apartment units	FS 173 (2.1)

**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* (Distance in miles from LACFD Fire Station)
43	501 E. 99th Street	Inglewood	SPR for 12 new condominiums	FS 18 (0.7), FS 170 (1.4), FS 173 (1.4)
44	921 N. Edgewood Street	Inglewood	38-unit apartment building	FS 173 (2.1)
45	222 W. Spruce Avenue	Inglewood	10 unit multifamily building	FS 18 (1.2), FS 173 (1.8), FS 170 (2.2)
46	961 E. 68th Street	Inglewood	3 unit detached condominium development	FS 173 (1.5)
47	417 N. Market Street	Inglewood	Two 6 unit condominium buildings	FS 173 (1.8), FS 18 (2.1)
48	819 E. La Palma Drive	Inglewood	5 unit multifamily building	FS 18 (1.3), FS 173 (1.3), FS 170 (1.8)
49	814 N. Market Street	Inglewood	18 bed congregate living facility	FS 173 (2.1), FS 18 (2.5)
50	411 E. Hazel Street	Inglewood	18 unit multifamily building	FS 173 (1.8), FS 18 (2.4)
51	329 E. Hazel Street	Inglewood	4-unit Condo with 10 parking spaces per SP-1229	FS 173 (1.8), FS 18 (2.3)
52	11111 S. Prairie Avenue	Inglewood	120-room hotel	FS 18 (1.0), FS 173 (1.1), FS 170 (1.2)
53	3920 W. 108th Street	Inglewood	3 unit apartment building	FS 18 (0.8), FS 170 (0.9), FS 173 (1.5)
54	125 E. Spruce Avenue	Inglewood	Seven (7) new apartment units with semi-subterranean parking	FS 18 (1.2), FS 173 (1.6), FS 170 (2.0)
55	704 N. Market Street	Inglewood	12 new residential apartment units	FS 173 (2.0), FS 18 (2.4)
56	408 E. Warren Lane	Inglewood	2-story 2,542 sf commercial building	FS 173 (1.7), FS 18 (2.3)
57	508 S. Eucalyptus Avenue	Inglewood	40-unit senior affordable housing development	FS 18 (1.3), FS 173 (1.9), FS 170 (2.3)
58	417-433 Centinela Avenue	Inglewood	116 unit apartment	FS 173 (1.7), FS 18 (2.4)
60	101, 125, 139, 140, 150 Market Street	Inglewood	40,000 sf retail and 150 parking spaces	FS 18 (1.7), FS 173 (1.5), FS 170 (2.2)
61	113-133 Plymouth Street	Inglewood	20-unit townhome development	FS 173 (2.3), FS 18 (2.5)
62	333 N. Prairie Avenue	Inglewood	PAD to allow the 310 townhome units at the former Daniel Freeman site	FS 173 (1.3), FS 18 (2.1), FS 170 (2.2)
63	705-715 N. Centinela Avenue	Inglewood	81,613 sf, approximately 400-unit, 5-story self-storage	FS 173 (2.0), FS 18 (2.5)
64	3660 W. 107th Street	Inglewood	3 dwelling units with 6 car garages	FS 170 (0.6), FS 18 (1.1), FS 173 (1.3)
65	614 E. Hyde Park Boulevard	Inglewood	18-bed congregate living facility	FS 173 (1.8)
66	1050 S. Prairie Avenue	Inglewood	371,923 sf retail; 3,567,314 sf office; 2,186 residential units; 300-room	FS 173 (1.0), FS 18 (1.1), FS 170 (1.3)

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)
			hotel; 13.07 acres open space/park;	
68	316 Hardy Street	Inglewood	5-unit condominium development	FS 18 (0.8), FS 173 (2.0), FS 170 (2.0)
69	943-959 W. Hyde Park Boulevard	Inglewood	5-story self-storage facility, 120,000 sf	FS 173 (1.8)
70	8911 Aviation Boulevard	Inglewood	General Plan amendment for rental car facility	FS 18 (1.8)
93	11604 Aviation Boulevard	Inglewood	Lot 1: 281-unit condo/townhomes, 5,000 sf retail/commercial; Lot 2: 112-unit apartment building and 21,500 sf retail/commercial	FS 18 (1.4)
97	11814 Aviation Boulevard	Inglewood	128-room hotel	FS 18 (1.5)
107	11824 Aviation Boulevard	Inglewood	5-story 36-unit apartment (20 three-bedroom units, 4 two-bedroom units, 12 one-bedroom units), 58 parking spaces, and 28 bicycle parking spaces	FS 18 (1.5)
108	10505 Hawthorne Boulevard	Inglewood	32-unit apartment building, with 5 units set aside for low-income tenants	FS 18 (0.2), FS 170 (1.5), FS 173 (1.8)
109	10609 S. Inglewood Avenue	Inglewood	9-units with 20% set aside for low-income tenants	FS 18 (0.4), FS 170 (2.0), FS 173 (2.3)
110	10907 S. Inglewood Avenue	Inglewood	Conversion of commercial structure into 4-residential units with 10 parking spaces	FS 18 (0.3), FS 170 (2.0), FS 173 (2.4)
112	10136 Felton Avenue	Inglewood	Restore an existing nonconforming apartment building to 19 units and 22 covered parking spaces (total unit count: 12 studios, 6 one-bedroom, 1 three-bedroom)	FS 18 (0.7), FS 170 (2.3), FS 173 (2.4)
113	5053 E. 109 Street	Inglewood	17-unit condominium conversion of existing apartments, including 2 units for low-income households	FS 18 (0.7), FS 170 (2.3)
129	3900 W. Century Boulevard	Inglewood	Airport Park View Renovation, 175 room hotel, 86,101 sf	FS 18 (0.9), FS 170 (1.0), FS 173 (1.2)

Commented [A10]: Am I assuming correctly that this is the portion of HPSP not included in the Adjusted Baseline? If so, that needs to be clearly explained somewhere.

Commented [A11]: What is the status/timing of this renovation?

NOTES:

FS = fire station;

^a Fire stations located within 2.5 miles of the cumulative project were included.

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

During operation of the Proposed Project, although the cumulative demand on LACFD services would increase, cumulative impacts on fire protection and emergency medical services would be reduced to less than significant through each cumulative project's compliance with the City and State Fire Codes and LAFCD design review, and site-specific design and safety features, similar to the Proposed Project. It is reasonable to assume such compliance because these codes are fully

enforced through the City of Inglewood's and other local communities' building inspection functions. Each cumulative project would be subject to the required review by the LACFD for compliance with the City's Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety that would reduce potential impacts to fire protection and emergency services. Project-by-project traffic mitigation, multiple fire station response, and other requirements imposed by the LACFD, are expected to help support adequate emergency response. Each cumulative project within the LACFD service area would be required to comply with regulatory requirements related to fire protection and emergency medical services.

In addition, the Proposed Project and cumulative projects in the City and the identified surrounding jurisdictions within the service areas of the LACFD, would be subject to the City's, or applicable jurisdiction's, standard construction permitting process, which includes review by LACFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with the site's applicable water company to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

As discussed above for the Proposed Project, the LACFD has no known or proposed plans to expand facilities within the project vicinity, even in consideration of the cumulative projects. 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.

Based on the above considerations, the Proposed Project, in conjunction with 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. As such, implementation of the Proposed Project, along with past, present, and reasonably foreseeable projects would have a **less-than-significant** cumulative impact on fire protection and emergency medical services.

Mitigation Measure

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).²⁵ 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.²⁶ The Inglewood PD also has the ability to call upon mutual assistance from surrounding law enforcement agencies.²⁷ 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**.

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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 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.^{28,29} 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, to be the home of the Los Angeles Rams and Los Angeles Chargers teams, the Inglewood PD will have specific responsibilities for traffic control that will be outlined in a Transportation Management and Operations Plan (TMOP).³⁰

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/

²⁵ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

²⁶ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

²⁷ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

²⁸ City of Inglewood Police Department, About the Police Department, <https://www.cityofinglewood.org/658/About-the-Police-Department>. Accessed August 2018.

²⁹ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

³⁰ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

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.³¹

The Inglewood PD includes four geographic patrol beats.³² 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.^{33,34}

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.³⁵ 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 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.^{36 37}

In 2018 the City of Inglewood has experienced a 2.9 percent decrease in crimes compared to 2017, which includes an 8 percent decrease in violent crimes. Specifically, within the Project Area,³⁸ the City has experienced a 7 percent decrease in crimes in 2018.³⁹ **Table 3.13-3**, below, provides the types and number of crimes committed for 2017 (the latest whole year for which annual crime data is available). As shown, the number of crimes in the City totaled 7,140 crimes, with most of the crimes related to property crimes, with larceny (theft) the second largest crime.

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

Crime	Number	Percent of Inglewood Crime
Violent Crimes	791	11%

³¹ City of Inglewood Police Department, Divisions, <https://www.cityofinglewood.org/540/Divisions>. Accessed August 2018.

³² City of Inglewood Police Department, Beat Map, dated February 6, 2007, <https://www.cityofinglewood.org/DocumentCenter/View/1074/Beat-Map-PDF?bidId=>. Accessed August 2018.

³³ 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.

³⁴ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

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 January 10, 2019.

³⁸ 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.

³⁹ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

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

Crime	Number	Percent of Inglewood Crime
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: Inglewood Police Department, Annual Crime Statistics 1978-2017, <https://www.cityofinglewood.org/DocumentCenter/View/11887/IPD-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 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.⁴⁰

3.13.6 Adjusted Baseline

As discussed in Section 3.0, Introduction to Environmental Analysis, the Proposed Project is not anticipated to be constructed and begin operations until mid-2023 for the 2023-24 NBA basketball season. Also as discussed in Section 3.0, the City has issued building permits for, and construction has commenced on, significant portions of the Hollywood Park Specific Plan, including the construction of the 70,000-seat NFL Stadium, a 6,000-seat performance venue, 518,077 square feet of retail and restaurant uses, 466,000 square feet of office space, 314 residential units, approximately 9,900 parking spaces, and a 11.89-acre park resulting in an

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

estimated 942 residents and 2,948 full-time employees. Due to the certainty of these projects being constructed and in operation prior to opening of the Proposed Project, the City of Inglewood determined that it is appropriate to include these projects in an Adjusted Baseline. Accordingly, the changes associated with these developments within the Hollywood Park Specific Plan area are considered as part of the adjusted environmental baseline. The construction and operation of the aforementioned portions of the Hollywood Park Specific Plan would result in additional structures and population (residents, patrons/attendees, and employees), thus creating an additional demand for police protection. Regulatory Setting

Commented [A13]: Formatting – should be heading for next section.

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.

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 interpret City goals and policies to determine if the Proposed Project is consistent or inconsistent with the City of Inglewood General Plan.

3.13.7 Analysis, Impacts and Mitigation

Significance Criteria

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, 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 and emergency medical services, its reasoning applies to police 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.

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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.

As a step in this analysis, the Inglewood PD was consulted 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

⁴¹ Court of Appeal of the State of California, First Appellate District, Division Three, Filed 11/30/15; *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*, <http://law.justia.com/cases/california/court-of-appeal/2015/a131412a.html>, accessed October 2018.

driven law enforcement agency and deploys according to the study of crime and crime trends.⁴² 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.⁴³ The letter of correspondence with the Inglewood PD is contained in the Draft EIR Appendix X. Based on this information and 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~~ would not 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.

Construction

There are a number of ways in which construction of the Proposed Project could result in increased demand for police protection, including theft or vandalism at the construction site, and construction-related traffic congestion, 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 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. With incorporation of the temporary security measures, the Proposed Project would avoid creating a new material demand for police protection that could require construction of new facilities.

⁴² Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

⁴³ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

Obstruction of Police Protection Response

Construction staging, including material stockpiling and equipment storage, would occur within the Project Site boundaries. However, lane closures and construction-related truck traffic on adjacent streets potentially could temporarily affect Inglewood PD response times to the Project Site and neighboring uses.

Temporary Lane Closures

Construction activities would involve temporary lane closures. During construction of the Arena Site, the easternmost travel lane of northbound South Prairie Avenue may be fenced and closed to travel from West 103rd Street to West Century Boulevard, except that the City would require driveway access to the residences at 10204 South Prairie Avenue and 10226 South Prairie Avenue to be maintained for the duration of construction. The southernmost lane on eastbound West Century Boulevard also may be closed to traffic adjacent to the Arena Site, from South Prairie Avenue for approximately 450 feet east to a location in front of the Airport Park View Hotel, as well as west of South Prairie Avenue along the frontage of the West Parking and Transportation Hub Site.

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. According to the Inglewood PD, these temporary lane closures during construction of the Proposed Project could increase response times to the Arena Site, the West Parking and Transportation Hub Site, the East Parking and Hotel Site, and the Well Relocation Site or locations within nearby neighborhoods. However, due to the unpredictability of the staging of construction activities, it is impossible to forecast with certainty or precision the effects on response times. According to the Inglewood PD, it maintains sufficient field resources in all areas of the City to respond to calls for services, and the impact to response times, if any, is not expected to be substantial.⁴⁴

Construction Traffic Congestion

Depending on the routes of responding emergency vehicles and the background traffic conditions during a specific time of day, lane closures combined with construction-related traffic, including construction truck traffic, could result in increased travel time for Inglewood PD due to increased congestion as a result of reduced road capacity, or flagging or stopping of traffic to accommodate trucks entering and existing the Project Site during construction. As such, construction activities could increase response times for Inglewood PD to local business and/or residences within the vicinity of the Project Site.

As explained below, the significance of any effects on response time would be reduced because impacts of such construction activity would be temporary and would be consistent with the flow of construction traffic. Construction workers generally start and end their work days in advance of peak traffic hours, thus reducing their potential effect on traffic and emergency responses. Truck routes for material and equipment deliveries, as well as for soil export and disposal, would

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

require approval by the City of Inglewood Public Works Department prior to construction activities, and these routes would be set by the City so as to create minimal traffic and access-related effects. Further, the City would require the Proposed Project to prepare and implement a Construction Management Plan that would include several features intended to reduce the potential need for Inglewood PD involvement in project construction activities, including but not limited to street closure information, detour plans, haul routes, and staging plans.

Based on the 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

There are a number of ways in which operation of the Proposed Project could result in increased demand for police protection, including the increase in pedestrian activity and population density at the Project Site, and operational-related traffic congestion, as discussed further below. However, according to the Inglewood PD, while the Proposed Project may result in the need for additional sworn officers and equipment, the increased demand would not result in the need for a new or expanded police station or other facilities that could result in physical environmental effects.⁴⁵

Demand for Police Protection, Facilities, Equipment, and Officers

Population Effects on Demand

The Proposed Project would result in an increase in the level of activity on the Project Site, especially before, during and after NBA basketball games and other concerts and events. 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 population density at the Project Site and in the project vicinity, as well as the potential increase in vehicle/pedestrian conflicts and accidents before, during and after events at the proposed Arena Structure, would result in periodic increases in demand for police protection from the Inglewood PD compared to existing conditions.

During away games for the LA Clippers and non-event periods, the Proposed Project would require typical Inglewood PD police protection services, which are expected to be similar to other entertainment, office, commercial, hotel, and parking uses in the City. It is expected that 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 a week, 24 hours a

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

day. Additionally, private security personnel and installation of proper 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 capacity events at the Arena Structure, an increased level of Inglewood PD police protection personnel would be required on- and/or off-site for patrolling and responding to potential incidences associated with the temporary increase in pedestrian activity and population. The Inglewood PD would provide traffic control for large-scale events at the Arena Structure.⁴⁶ The Inglewood PD would determine in advance if additional staff would be required based upon attendance at the Arena Structure during game and large events.⁴⁷ It is anticipated that for games/events at the Arena Structure, typical police responses would be associated with actions such as ejections from fans from the Arena Structure and arrests, public intoxications, thefts from vehicles, and low-level assaults.

During games and other large events at the Arena Structure, the Proposed Project 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.

Project Design

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 Structure and Transportation Hub 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

⁴⁶ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

⁴⁷ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

of the Proposed Project.⁴⁸ According to the Inglewood PD, the proposed street vacations could increase response times to the Arena Site, the West Parking and Transportation Hub Site, the East Parking and Hotel Site, and the Well Relocation Site or nearby neighborhoods. However, the Inglewood PD maintains sufficient field resources in all areas of the City to respond to calls for services. According to the Inglewood PD, the impact to response times, if any, is not expected to be substantial.⁴⁹

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 typically included at arenas such as temporary detention facilities. In addition, as discussed above, 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 LACFD, Inglewood PD, 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 install and utilize a 24-hour security camera network throughout surface parking and parking garage areas; the elevators; the plaza; the common and amenity spaces; and the lobby areas. All security camera footage would be maintained for at least 30 days, and such footage would be provided to the Inglewood PD, as needed. The Project landscaping would be designed so as to not impede visibility. Overall, incorporation of project safety features within the Arena Structure, such as temporary detention facilities and the command center, would avoid the need for construction of new facilities for police protection.

Traffic Effects on Response Time

Project-related increase in traffic on surrounding roadways could potentially affect emergency response in the area. However, 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, 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. The Proposed Project would include an Event TMP to facilitate multi-modal travel to and from events at the Project Site in a safe and efficient manner. Thus, Project-related traffic is not anticipated to impair the Inglewood PD from responding to emergencies at the Project Site; avoiding a new material demand for police protection that could require construction of new facilities that could adversely affect the environment. 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.

⁴⁸ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

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

Overall, as discussed above, the Proposed Project may result in the need for additional sworn officers and equipment, but not a new or expanded station or other physical facilities other than those included in the Arena Structure.⁵⁰ 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 on 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 the Inglewood PD's service area. Projects located in other police protection jurisdictions would be primarily served by their respective police stations. However, the LASD and the 47 local police departments within Los Angeles County have agreed to provide mutual aid in the event of a major unplanned event which would affect the provision of appropriate law enforcement resources.⁵¹

Impact 3.13-4: Implementation of the Proposed Project, in combination with other development, ~~could-would not~~ 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.

Construction

The Inglewood PD would provide police protection services to 37 of the ~~130~~ cumulative projects listed in Appendix _____, which would be constructed within the City of Inglewood and within the service areas of the Inglewood PD. Similar to the Proposed Project, it is expected that the cumulative projects (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. Further, as required, construction management plans would be prepared, by the project applicants and approved by the City's Department of Public Works. The Proposed Project, in combination

⁵⁰ Mark Fronterotta, Chief of Police, letter correspondence dated October 11, 2018.

⁵¹ Mark Fronterotta, Chief of Police, letter correspondence dated January 10, 2019.

with other cumulative development within the City of Inglewood, would avoid creating a new material demand for police protection that could require construction of new facilities. Therefore, construction of the Proposed Project, along with the construction of past, present, and reasonably foreseeable future projects would have a **less than significant** cumulative impact on police protection.

Operation

Of the 440 cumulative projects in Appendix _____, 37 are located within the City of Inglewood and within the service areas of the Inglewood PD. The development of these 37 cumulative projects located within the service area of the Inglewood PD consists of approximately 3,358 residential units, 642,578 square feet of commercial uses, 3,566,314 square feet of office uses, 723 hotel rooms, and 569,329 square feet of open space. Operation of the Proposed Project, along with the operations of past, present, and reasonable future projects, could have a potential significant impact on police protection.

While the Inglewood PD does not know the exact location or timing, the Department does expect the need for expanded facilities to meet cumulative demand.⁵² The location, size/scope and timing are currently unknown. Therefore, the impacts of the construction and operation of a new police station, or the expansion of the existing station, remain speculative and would be analyzed at that time under CEQA as project independent of the Proposed Project. However, although the site of a future police station or the expansion of a station would be in a highly urbanized area, the potential exists for construction of the police facility to create significant impacts related to air emissions, construction noise, traffic congestion, potential adverse effects on historic structures, archaeological resources, or paleontological resources, disturbance of existing contaminated soils or building materials (i.e., asbestos), but that it would be unlikely to create significant impacts related to visual effects, light and glare, biological resources, services, and utilities. At this time, information is not known about the location or size of future police facilities.

Similar to the Proposed Project, it is expected that the cumulative projects (particularly those of a larger nature) would be subject to review by the Inglewood PD on a project-by-project basis 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.

As discussed above, the Inglewood PD provides traffic control for all large-scale events within the City, including events at The Forum and public and private events at the new NFL stadium. Similarly, the Inglewood PD would provide traffic control for large-scale events at the Arena Structure to facilitate safe movement of, and minimize potential conflicts among pedestrians, bicycles, and vehicles. The Inglewood PD determines in advance if additional staff would be

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

required based upon attendance at these venues during game and large events. Further, the Inglewood PD maintains sufficient field resources in all areas of the City to respond to calls for services.⁵³ 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 Inglewood PD expenditures necessary to meet increased demand for police protection.

Based on the above considerations, and the need for expanded facilities to meet cumulative demand according to the Inglewood PD, the Proposed Project, in conjunction with other cumulative development within the Inglewood PD service area, may result in need for the construction of new, or expanded police facilities in order to maintain acceptable response times or other performance objectives. There are currently no plans in place for the construction of such facilities. For this reason, there is no way to determine whether, or to what extent, the construction of such facilities will result in physical environmental effects. Given the urban character of much of the City, it is likely that the construction of such facilities would not result in significant environmental effects. Absent specific plans, however, any analysis of these impacts would be speculative at this time.

Mitigation Measure

None required.

Parks or Recreational Services

3.13.8 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.⁵⁴ As discussed below, the 1995 Open Space Element is the most recently adopted Open Space Element by the City, and ~~also recommended provides that as a~~ ~~minimum threshold, the City should have a park/population ratio of one acre per 1,000 residents.~~ This threshold is used to determine the Project's impacts on parks or recreational services.⁵⁵ The

Commented [A15]: Add cite to page 7 of the Open Space Element.

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

⁵⁴ City of Inglewood Facilities, <https://www.cityofinglewood.org/Facilities>, accessed August 2018.

⁵⁵ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.

City's existing ratio is 0.8 acres of parkland per 1,000 residents,⁵⁶ ~~thereby and therefore does not meet~~ the City's goal.

The park nearest the Project Site is Center Park, located at 3660 West 111 Street, approximately one mile southeast of the Project Site; refer to **Figure 3.13-2** for the location of Center Park.

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 adjacent 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."⁵⁷

Commented [A16]: It would be helpful to provide an outline in the figure showing the boundaries of the park

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.⁵⁸

3.13.9 Adjusted Baseline

As discussed in Section 3.0, the Proposed Project is not anticipated to be constructed and begin operations until mid-2023 for the 2023-24 NBA basketball season. Also as discussed in Section 3.0, the City has issued building permits for, and construction has commenced on, significant portions of the Hollywood Park Specific Plan, including the construction of the 70,000-seat NFL Stadium, a 6,000-seat performance venue, 518,077 square feet of retail and restaurant uses, 466,000 square feet of office space, 314 residential units, approximately 9,900 parking spaces, and a 11.89-acre park resulting in an estimated 942 residents and 2,948 full-time employees. Due to the certainty of these projects being constructed and in operation prior to opening of the Proposed Project, the City of Inglewood determined that it is appropriate to include these projects in an Adjusted Baseline. Accordingly, the changes associated with these developments within the Hollywood Park Specific Plan area are considered as part of the adjusted environmental baseline.

The nearest parks to the Hollywood Park Specific Plan site include Darby Park, located at 3400 West Arbor Vitae Street, approximately 0.50 miles east of the Hollywood Park Specific Plan site; Queen Park, located at 652 East Queen Street, approximately 0.87 miles northwest of Hollywood Park Specific Plan site; and Center Park, located approximately 1.10 miles south of the

⁵⁶ Per the Census (<https://www.census.gov/quickfacts/inglewoodcitycalifornia>, accessed January 2019), the City of Inglewood population as of July 1, 2017 was 110,598 persons. $110,598 \text{ persons} / 1,000 = 110.598$. $89.6 \text{ acres of existing parkland} / 110.598 = 0.8$ acres of parkland per 1,000 persons.

⁵⁷ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.

⁵⁸ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.

Hollywood Park Specific Plan site.⁵⁹ The Hollywood Park Specific Plan site is located within South Inglewood (District 4), which is considered “park poor.”⁶⁰ As discussed above, Center Park, which is classified as a neighborhood park, is the only park located within District 4 and does not fully address the needs of the community.

The Hollywood Park Specific Plan includes the development of the 11.89-acre Lake Park. Lake Park will be the central public open space of the Hollywood Park, which will provide acres of multi-use programming, including 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. As the Hollywood Park Specific Plan development includes approximately 314 residential units, the park demand in South Inglewood would increase by 0.93 acres.⁶¹ As such, development of the 11.89-acre Lake Park would exceed the park demand of the additional 314 residential units; thereby making this portion of the City of less “park poor.” Further, with development of the 11.89-acre Lake Park in addition to the City’s existing 89.6 acres for a total of 101.49 acres of parkland, the City’s Adjusted Baseline parkland ratio will become 0.9 acres of parkland per 1,000 residents,⁶² which is greater than the City’s existing ratio of 0.8 acres of parkland per 1,000 residents. However, the City’s Adjusted Baseline parkland ratio still ~~does not~~ not meet the City’s ~~goal~~ minimum threshold of one acre of parkland per 1,000 residents.

Commented [A17]: Does this description match cumulative or adjusted baseline? Reads like cumulative; revise as needed.

3.13.10 Regulatory Setting

Federal

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

State

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

⁵⁹ Distances are measured from the center of the Hollywood Park Specific Plan site.

⁶⁰ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, letter correspondence dated October 2, 2018.

⁶¹ 314 residential units X 2.97 persons per household (per the City of Inglewood General Plan 2014 Housing Element) = 933 residents. 933 residents/1,000 persons = 0.93 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).

⁶² Per the 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 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.

Local

City of Inglewood General Plan

The City of Inglewood General Plan, Open Space Element,⁶³ was designed to address the current and future recreation 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 standard ratio of neighborhood and community parks identified in the 1995 Open Space Element ~~also explained that the City's 1973 Open Space and Parks Element adopted 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. Also cited in the 1973 Element was 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 to strive for a more realistic and achievable standard, a minimum threshold of one acre per 1,000 persons/residents.~~⁶⁴ 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.⁶⁵ 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.

⁶³ City of Inglewood, Community Development and Housing Department, City of Inglewood General Plan, Open Space Element, Adopted December 1995, <https://www.cityofinglewood.org/DocumentCenter/View/131/Open-Space-Element>, accessed August 2018.

⁶⁴ City of Inglewood, Open Space Element, 1995.

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

The Proposed Project would appear to be consistent 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 Structure activities. However, as 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 on parks or recreational facilities in the City. 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 interpret City goals and policies to determine if the Proposed Project is consistent or inconsistent with the City of Inglewood General Plan.

3.13.11 Analysis, Impacts and Mitigation

Significance Criteria

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 population at the Project Site and the project vicinity, which includes visitors, customers, and employees which could require park and recreational facilities. The analysis also addressed potential impacts on park facilities that might occur due to construction activities.

As a step in this analysis, the Parks Department was consulted and the responses provided regarding the Proposed Project were incorporated. The letter of 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 Parks Department's construction of such facilities would ~~reasonable~~ 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~~ would not 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.

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

The nearest park to the Project Site is Center Park located at 3660 West 111 Street, approximately one mile southeast of the Project Site. Center Park is classified as a neighborhood park surrounded by single family residences and located adjacent to the Worthington Elementary School. This park is not located along major streets that would provide access to Project-related construction activities and equipment. The distance of this park from construction activities and the intervening development would avoid potential noise impacts and conflicts with construction worker activities.

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 as a consequence of working on the Proposed Project is negligible. Although the nearest City park is about one mile from the Project Site, it is possible that a small number of construction workers may visit a park to eat lunch or for recreation after a day of work. However, construction workers are temporary employees with high turnover rates associated with the various phases of construction. Such park use would be rare 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 a corresponding permanent 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, response times or other performance objectives. Therefore, impacts on parks ~~or 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 ~~2,600,000~~ 2,600,000 square-foot (~~61.8~~ 61.8-acre) large outdoor space designed to accommodate crowds associated with Arena ~~Structure~~ events, and also serve as an activity center and outdoor space for everyday use. 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 ~~Structure~~ activities.

Commented [A18]: Revised to be consistent with Project Description.

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

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

~~Most, if not all~~ Most of the major events with the anticipated largest attendance to take place in the Arena ~~Structure~~ would occur ~~in the evenings in the fall through the spring, primarily during evening hours when most City parks, including the 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

Commented [A19]: Concert maximum attendance is higher than NBA game maximum, and it seems possible that more concerts will be held during the off-season when easier to schedule without having to work around the NBA schedule.

Commented [A20]: It would be worth briefly addressing the possibility that event attendees could use parks during the pre-event hours.

P.M.⁶⁶ 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~~ For the above reasons, event attendees, customers, or project employees ~~would not~~ would create a material demand on local parks 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~~ would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of ~~the~~ a facility would occur or be accelerated.

The Project Site is located within South Inglewood, District 4. District 4 is underserved and considered “park poor” with regards to parks or recreational services. The only park within District 4 is Center Park, which is classified as a neighborhood park. Center Park is located approximately one mile southeast of the Project Site. The development associated with the Adjusted Baseline, which includes the 11.89-acre Lake 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. Further, with ~~the anticipated~~ development of Lake Park ~~in the Hollywood Park Specific Plan area~~, the City’s Adjusted Baseline parkland ratio ~~would~~ becomes 0.9 acres of parkland per 1,000 residents, which ~~is~~ would be greater than the City’s existing ratio of 0.8 acres of parkland per 1,000 residents. However, the City’s Adjusted Baseline parkland ratio still ~~does~~ would not meet the City’s goal of one acre of parkland per 1,000 residents.

Commented [A21]: See above re AB vs. cumulative distinction.

As discussed above, ~~most~~ major events with the anticipated largest attendance ~~to take place in the Arena Structure~~ would occur ~~in the primarily during~~ evening hours ~~in the fall through the spring~~, when most City parks, including the Center Park, are closed for operation. 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. Because any potential use of City parks by project event attendees, customers, and/or employees would be very limited, ~~if not unmeasurable~~, 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 ~~is~~ would be **less than significant**.

⁶⁶ Sabrina Barnes, Director, Parks, Recreation, and Library Services, City of Inglewood, email correspondence dated January 2, 2019.

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.

As discussed above, 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 off-site parks or recreational facilities are proposed. Implementation of the ~~project~~ Proposed Project's recreational facilities could have an adverse physical effect on the environment, but these potential impacts are described under other environmental topics in Section 3.0, Environmental Impacts, Settings, and Mitigation Measures, of this EIR. As described throughout this EIR (e.g., Section 3.3, Biological Resources, Section 3.4, Cultural Resources, and ~~section~~ Section 3.9, Hydrology and Water Quality), the ~~construction and operation~~ implementation of these recreational facilities would not have an adverse physical effect on the environment. Therefore, ~~this~~ impacts would be **less than significant** in this regard.

Mitigation Measures

None required.

Cumulative Impacts

The geographic scope of analysis for cumulative impacts related to parks or recreational facilities includes those past, present, and reasonably foreseeable cumulative projects located within the City of Inglewood. The scope is further defined by 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.~~ Projects located in other jurisdictions would typically be served by local parks or recreational facilities.

Commented [A22]: Add cite.

Impact 3.13-8: Implementation of the Proposed Project, in combination with other development, ~~could~~ would not 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, ~~response times~~ or other performance objectives for parks or recreational facilities.

Construction

The City would provide parks and recreational services for 37 of the ~~130~~ cumulative projects listed in Appendix _____, which are located within the City of Inglewood. Further, ~~similar to~~ in addition to the Proposed Project, 6 cumulative projects (cumulative projects #s 52, 53, 64, 66, 129, and 130) are also located within South Inglewood (District 4). As discussed above, park usage by construction workers would be rare 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. Construction works associated with the Proposed Project and cumulative development would not result in a significant increase of residential population within the City. Construction of the Proposed Project in combination with other cumulative development 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, ~~response times~~ or other performance objectives. Therefore, cumulative impacts on parks ~~and~~ recreational facilities during construction of the Proposed Project 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 by comparable facilities. Of the ~~130~~ cumulative projects listed in Appendix _____, 37 are located within the City of Inglewood. The development of these 37 cumulative projects consists of approximately 3,358 residential units, 642,578 square feet of commercial uses, 3,566,314 square feet of office uses, 723 hotel rooms, and 569,329 square feet of open space. This development of cumulative projects within the City of Inglewood includes 3,358 residential units which would increase park demand in the City by 9.97 acres.⁶⁷ ~~Specifically~~ More specifically, the development of the 6 cumulative projects (cumulative projects #s 52, 53, 64, 66, 129, and 130) located within South Inglewood (District 4) would ~~consist~~ ~~of~~ include approximately 2,192 residential units, which would increase park demand in District 4 by 6.51 acres.⁶⁸ Therefore, operation of the Proposed Project, along with the operations of past,

⁶⁷ 3,358 residential units X 2.97 persons per household (per the City of Inglewood General Plan 2014 Housing Element) = 9,973 residents. 9,973 residents/1,000 persons = 9.97 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).

⁶⁸ 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).

present, and reasonable future projects, would have a potential significant impact on parks or recreational services.

As the 1995 Open Space Element is the most recently adopted Open Space Element by the City, ~~the recommended minimum threshold of one acre per 1,000 residents is used to determine the Project's impacts on parks or recreational services/facilities.~~ The City's Adjusted Baseline parkland ratio, which includes the City's existing 89.6 acres of parkland plus the development of the 11.89-acre Lake Park within the Hollywood Park Specific Plan area for a total of 101.49 acres of parkland, is approximately 0.9 acres of parkland per 1,000 residents; thereby, not meeting the City's goal. Cumulative Project #66, the Hollywood Park Specific Plan, would include the development of the approximately 2.5-acre Arroyo Park, the approximately 10.57-acre Bluff Park, and the Champion Plaza. The Hollywood Park Specific Plan area is located immediately north of the Proposed Project and within South Inglewood (District 4), which is considered "park poor." 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 will be a naturalistic park organized around shallow, vegetated swales that also provide stormwater management with park amenities to create a comprehensive landscape infrastructure. The network of walkways utilizes the linear park creating areas to accommodate programs including nature education, a naturalistic play area, and game tables. The Bluff Park is will be an active recreation park. In addition to publicly accessible amenities, Bluff Park may include a home owner's association-controlled community center. This park will provides a venue for outdoor activity and recreation and includes open fields for informal sports, a tot-lot, picnic space, dog park with pet waste disposal containers, a restroom, and parking. Potential programs amenities for the community center include pools, tennis courts, an outdoor fireplace and seating area, and a restroom. The Champion Plaza is will be a large open plaza which provides 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 37 cumulative projects located within the City of Inglewood were constructed, including the park and open space component of the Hollywood Park Specific Plan, the City's ratio would become 0.9 acres of parkland per 1,000 residents⁶⁹; thereby, ~~not exceeding~~remaining below 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.

Commented [A23]: Need to clarify what portions of HPSP are part of the Adjusted Baseline versus cumulative.

As described above, the Proposed Project would not include residential uses, and thus, would not increase the residential population of the City. Nevertheless, the Proposed Project would increase the existing visitor, customer, and employee populations at the Project Site. ~~Most, if not all, of the~~

⁶⁹ Per the 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 persons + 9,973 persons (total population from the 38 cumulative projects located within the City of Inglewood) = 120,571 persons. 120,571 persons/1,000 = 120.57. 89.6 acres of existing parkland + 13.07 acres of parks/open space from the Hollywood Park Specific Plan = 102.67 acres of existing and future parkland. 102.67/120.57 = 0.85 acres/1,000 people (rounds up to 0.9).

major events with the anticipated largest attendance ~~to take place in the Arena Structure~~ would occur ~~in the primarily during evening hours in the fall through the spring~~ when most City parks, including the Center Park, are closed for operation. 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~~ create a material demand on local parks ~~such that resulting in a need for new or physically altered facilities for the provision of park or recreation facilities is created~~. Therefore, the Proposed Project's contribution would be less-than-cumulatively considerable. As such, potential cumulative impacts on parks and recreation facilities would be **less than significant**.

Mitigation Measures

None required.

Impact 3.13-9: Implementation of the Proposed Project, in combination with other development, ~~could would not~~ 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.

The development of the 37 cumulative projects located within the City of Inglewood consists of approximately 3,358 residential units, 642,578 square feet of commercial uses, 3,566,314 square feet of office uses, 723 hotel rooms, and 569,329 square feet of open space. This development of cumulative projects within the City of Inglewood includes 3,358 residential units which would increase park demand in the City by 9.97 acres.⁷⁰ ~~More s~~Specifically, the development of the 6 cumulative projects (cumulative projects #s 52, 53, 64, 66, 129, and 130) located within South Inglewood (District 4) would ~~contain~~ include approximately 2,192 residential units, which would increase park demand in District 4 by 6.51 acres.⁷¹ Therefore, operation of the Proposed Project, along with the operations of past, present, and reasonable future projects, ~~would could~~ contribute to the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility could occur or be accelerated.

The City's ~~current~~ Adjusted Baseline parkland ratio ~~is would be~~ approximately 0.9 acres of park per 1,000 residents; thereby, not meeting the City's goal. The southern portions of the City are not adequately served by comparable facilities and specifically, within District 4, are considered "park poor."⁷² However, Cumulative Project #66, the Hollywood Park Specific Plan ~~area~~, located

⁷⁰ 3,358 residential units X 2.97 persons per household (per the City of Inglewood General Plan 2014 Housing Element) = 9,973 residents. 9,973 residents/1,000 persons = 9.97 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).

⁷¹ 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).

within District 4, would include 13.7 acres of open space and recreational uses which will be publicly accessible. Further, 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.

As discussed above, the Proposed Project would not include residential uses, and thus, would not increase the residential population of the City. Nevertheless, the Proposed Project would increase the existing visitor, customer, and employee populations at the Project Site. Most, if not all, of the major events with the anticipated largest attendance to take place in the Arena Structure would occur in the primarily during evening hours in the fall through the spring, when most City parks, including the Center Park, are closed for operation. 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. Because any potential use of City parks by project event attendees, customers, and/or employees would be very limited, if not unreasonable, it is not foreseeable that such use could result in substantial physical deterioration of such facilities. Therefore, the Proposed Project's contribution would be less-than-cumulatively considerable. As such, potential cumulative impacts on parks and recreation facilities would be **less than significant**.

Mitigation Measures

None required.

Impact 3.13-10: Implementation of the Proposed Project, in combination with other development, could include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

The development of the 37 cumulative projects located in the City of Inglewood is anticipated to consist of approximately 3,358 residential units, 642,578 square feet of commercial uses, 3,566,314 square feet of office uses, 723 hotel rooms, and 569,329 square feet of open space. This development of cumulative projects within the City of Inglewood includes The 3,358 residential units which would increase park demand in the City by 9.97 acres.⁷² More Specifically, the development of the 6 cumulative projects (cumulative projects #s 52, 53, 64, 66, 129, and 130) located within South Inglewood (District 4) would consist of include approximately 2,192 residential units, which would increase park demand in District 4 by 6.51 acres.⁷³ Cumulative Project #66, the Hollywood Park Specific Plan, located within District 4,

⁷² 3,358 residential units X 2.97 persons per household (per the City of Inglewood General Plan 2014 Housing Element) = 9,973 residents. 9,973 residents/1,000 persons = 9.97 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).

⁷³ 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

would include 24.95 acres of open space and recreational uses which will be publicly accessible. 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.

Commented [A24]: This is a greater amount than stated elsewhere in this Section.

If all 37 cumulative project located within the City of Inglewood were constructed, including the park and open space component of the Hollywood Park Specific Plan, the City's ratio would become 0.9 acres of park per 1,000 residents; thereby, not meeting the City's goal. 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. Further, no evidence exists to suggest that the construction of the park and open space facilities of the Hollywood Park Specific Plan ~~area~~ would have an adverse physical effect on the environment.

As discussed above, implementation of the Proposed Project's recreational facilities could have an adverse physical effect on the environment, but these potential impacts are described under other environmental topics in Section 3.0, Environmental Impacts, Settings, and Mitigation Measures, of this EIR. As described throughout this EIR (~~see~~, Section 3.3, Biological Resources, Section 3.4, Cultural Resources, and section 3.9, Hydrology and Water Quality), the implementation of these recreational facilities would not have an adverse physical effect on the environment. Therefore, the Proposed Project's contribution would be less-than-cumulatively considerable. As such, potential cumulative impacts on parks and recreation facilities would be **less than significant**.

Mitigation Measures

None required.

Public Schools

3.13.12 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.

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).

During the 2017-2018 school year, the IUSD operated 19 schools which consisted of 10 elementary schools, two transitional K-8 schools, two middle schools, three high schools, one continuation school, and one community adult school; refer to **Figure 3.13-3** for the locations of the schools. The IUSD also operates a preschool program. The IUSD employed approximately 450 teachers, 60 administrators, 40 pupil-services personnel, and 470 support staff during the 2017-2018 school year.⁷⁴

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. 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. The enrollment of the IUSD in school year 2017-2018 was 9,258 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 92 elementary school seats, a surplus of 803 middle school seats, and a surplus of 19 high school seats.⁷⁵

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

School Level	2017-2018 Facilities Capacity ^a	2017-2018 Student Enrollment ^b	Excess/(Shortage) Capacity
Elementary School (Grades K-5)	5,247	5,155	92
Middle School (Grades 6-8)	2,873	2,070	803
High School (Grades 9-12)	2,079	2,060	19
Existing Total	10,199	9,285	914

NOTES:

- ^a Most recent school year information available.
- ^b Capacity based on classroom utilization information provided by the IUSD.
- ^c 2017-2018 student enrollment provided by the IUSD.

Source: 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.

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

⁷⁴ 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.

⁷⁵ 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.

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.⁷⁶ Specifically, enrollment in the IUSD is down approximately 47 percent, or more than 8,300 students since 2003. Approximately 800 students left the IUSD in the 2016-2017 school year and another 500 students departed in the 2017-2018 school year. The student decline is expected to continue with enrollment dropping by 500 students in the 2017-2018 school year and another 1,000 students expected to depart in the next two years. Since 2012, the IUSD remains under state control as its installed leaders try to stabilize their budget, recruit and retain quality teachers and administrators, repair crumbling campuses and improve academic programs.⁷⁷

3.13.13 Adjusted Baseline

As discussed in Section 3.0, Introduction to Environmental Analysis, the Proposed Project is not anticipated to be constructed and begin operations until mid-2023 for the 2023-24 NBA basketball season. Also as discussed in Section 3.0, the City has issued building permits for, and construction has commenced on, significant portions of the Hollywood Park Specific Plan, including the construction of the 70,000-seat NFL Stadium, a 6,000-seat performance venue, 518,077 square feet of retail and restaurant uses, 466,000 square feet of office space, 314 residential units, approximately 9,900 parking spaces, and a 11.89-acre park resulting in an estimated 942 residents and 2,948 full-time employees. Due to the certainty of these projects being constructed and in operation prior to opening of the Proposed Project, the City of Inglewood determined that it is appropriate to include these projects in an Adjusted Baseline. Accordingly, the changes associated with these developments within the Hollywood Park Specific Plan area are considered as part of the adjusted environmental baseline.

According to **Table 3.13-5**, development associated with Phase 1 of the Hollywood Park Specific Plan would generate approximately 110 elementary school students, 45 middle school students, and 44 high school students for a total increase of 199 additional students that would be attending schools within the IUSD. **Table 3.13-6** provides the Adjusted Baseline school facilities capacity and student enrollment. The IUSD would have a shortage of 18 elementary school seats, an excess of 758 middle school seats and a shortage of 25 high school seats ~~resulting from under the~~ Adjusted Baseline conditions.

Commented [A25]: Is Phase 1 the development described in the paragraph above? If so, that should be made clear.

⁷⁶ 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.

⁷⁷ KCET Original, City Rising, Article, "The Informal Economy, Report Finds Inglewood Unified Improving, but Still Struggling to Keep Students", dated December 7, 2018, accessed <https://www.kcet.org/shows/social-connected/report-finds-inglewood-unified-improving-but-still-struggling-to-keep-students>.

**TABLE 3.13-5
 ESTIMATED NUMBER OF STUDENTS GENERATED BY THE ADJUSTED BASELINE**

Land Use	Development	Units	Elementary School ^{a,b}	Middle School ^{a,b}	High School ^{a,b}	Total ^f
Proposed Uses						
70,000 Seat NFL Stadium ^e	2,000,000 ^d	Sq. ft.	41	17	16	74
6,000 Seat Performance Venue	X	Sq. ft.	2	1	1	4
Commercial Uses ^c	518,077	Sq. ft.	11	4	4	19
Office ^d	466,000	Sq. ft.	15	6	6	27
Residential ^e	314	Units	41	17	17	75
Total Students			110	45	44	199

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 Retail and services generation rates were used.
- ^d Office generation rates were used.
- ^e Multi-family attached generation rates were used.
- ^f Rounded to the nearest whole number.
- ^g 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.

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/FSRes_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.

Commented [A26]: Should reflect submitted plans, rather than cite to comparables.

**TABLE 3.13-6
 ADJUSTED BASELINE 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	5,265	(18)
Middle School (Grades 6-8)	2,873	2,115	758
High School (Grades 9-12)	2,079	2,104	(25)
Adjusted Baseline Total	10,199	9,484	715

NOTES:

- ^a Most recent school year information available.
- ^b Capacity based on classroom utilization information provided by the IUSD.
- ^c 2017-2018 student enrollment provided by the IUSD.

Source: 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.

3.13.14 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 I, 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.

Commented [A27]: Unless those listed are the only federally funded programs for schools.

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.⁷⁸

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 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

⁷⁸ California Education Code Section 17620(a)(1).

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 ~~full other forms of~~ mitigation of school impacts and ~~replaced it with~~ provided the ability for school districts to assess fees in specified amounts directly 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.⁷⁹

SB 50 also sets 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 SB 50 states that payment of developer fees are “deemed to be complete and full mitigation” of the impacts of new development for purposes of CEQA, fees and state funding do not fully fund new school facilities. ~~Both SCUSD, IUSD, and TRUSD~~ receives Level 1 fees. Pursuant to Government Code Section ~~65995~~ 65996, the payment of these fees by a developer serves to mitigate potential impacts of increased enrollment that may result from implementation of a project to a less-than-significant level.⁸⁰

Commented [A28]: Confirm

California Code of Regulations

The California Code of Regulations (CCR), Title 5, Division 1, Chapter 13, Subchapter 1, Article 2 outlines minimum requirements for the placement of schools, and specifically addresses placement of school sites in proximity to railroad tracks, as shown below.

⁷⁹ State of California, Office of Public School Construction, School Facility Program Guide, October 24, 2012, https://www.documents.dgs.ca.gov/opsc/publications/handbooks/sfp_guide.pdf, accessed December 2018.

⁸⁰ Calif. Government Code § 65996.

Section 14010. Standards for School Site Selection

All districts shall select a school site that provides safety and that supports learning. The following standards shall apply:

- d. If the proposed site is within 1,500 feet of a railroad track easement, a safety study shall be done by a competent professional trained in assessing cargo manifests, frequency, speed, and schedule of railroad traffic, grade, curves, type and condition of track, need for sound or safety barriers, need for pedestrian and vehicle safeguards at railroad crossings, presence of high pressure gas lines near the tracks that could rupture in the event of a derailment, preparation of an evacuation plan. In addition to the analysis, possible and reasonable mitigation measures must be identified.

Section 14011. Procedures for Site Acquisition State-Funded School Districts

This section requires that the Department of Education provide written approval of new school sites for state-funded school districts. Among the findings that must be made is that the school site does not contain a natural gas line.

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.⁸¹

The City of Inglewood General Plan Land Use Element does not obtain goals, objectives, or policies regarding public schools, ~~nor do any of the other City of Inglewood General Plan elements.~~

Commented [A29]: Confirm.

Inglewood Unified School District

As stated above, the State is primarily responsible for the funding and structure of the local school districts, and in this case, the IUSD. As the IUSD provides education to students ~~in many cities and county areas, in addition to the City of Los Angeles,~~ its oversight is largely a district-level issue. Public schools operate under the policy direction of elected governing district school boards (elected from the local area) as well as by local ~~voter-approved~~ propositions which directly impact the funding of facility construction and maintenance. Pursuant to SB 50, the IUSD collects developer fees for all new construction within its boundaries; refer to **Table 3.13-7** below.

Commented [A30]: Discuss.

⁸¹ City of Inglewood General Plan, Land Use Element, updated 2016, Available: <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>, accessed November 2018.

**TABLE 3.13-7
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 https://www.myiUSD.net/wp-content/uploads/2018/05/FSRes_Inglewood_FN.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 https://www.myiUSD.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf, Accessed January 2019; and ESA 2019.

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.^{82,83}

The IUSD will accept outgoing inter-district permit applications beginning April 1st and ending ~~on~~ 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 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 ~~will be aware due by~~ February 1st for the subsequent school year. For the present school year, incoming permits ~~will be aware~~ 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.

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

⁸² Yadallittle Preciado, IUSD staff within the ADA Attendance Clerk’s Office, phone correspondence, January 7, 2018 at 3:45pm.

⁸³ Inglewood USD, AR 5117 Students, Inter-District Attendance Permits, <http://www.gamutonline.net/district/inglewoodusd/displayPolicy/1079451/1>, accessed January 2019.

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.⁸⁴

3.13.15 Analysis, Impacts and Mitigation

Significance Criteria

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 significant environmental impacts.

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

⁸⁴ Inglewood USD, AR 5117 Students, Inter-District Attendance Permits, <http://www.gamutonline.net/district/inglewoodusd/displayPolicy/1079451/1>. Accessed January 2019.

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 a baseline. 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, ~~including~~ 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; ~~response times~~ or other performance objectives for schools.

Impacts and Mitigation Measures

Impact 3.13-11: Implementation of the Proposed Project ~~could~~ would not 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.

Construction

The nearest schools to the Proposed Project include 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.⁸⁵ Construction vehicles would use major arterials 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, and Crenshaw Boulevard. 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 construction employees who would be hired from a mobile regional construction work force that moves from project to

⁸⁵ Distances are measured from the center of the Arena Site.

project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and short durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate their families or their residences 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 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 3.13-8, provides an estimated number of students generated by the Proposed Project. As shown in Table 3.13-8, 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 ~~overestimated~~ ~~overestimates~~ the Proposed Project's actual potential to generate new students.

**TABLE 3.13-8
 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 ^a	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				
Hotel Uses ^e	49,500 ^f	Sq. ft.	0.0103/1,000sf	1	0	0	Total: 1
			0.0042/1,000sf				
			0.0041/1,000sf				
Total Proposed				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 USA Today, 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.miyusd.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf, accessed January 2019; and ESA, 2019.

As described ~~below~~ above in **Table 3.13-9**, the IUSD would have a shortage of 18 elementary school seats, an excess of 758 middle school seats and a shortage of 25 high school seats resulting from the Adjusted Baseline. ~~Due to the shortage of 18 elementary school seats, the IUSD would not be able to accommodate the 27 elementary school students generated by the Proposed Project. The projected student enrollment with the Proposed Project would total 5,292 elementary school students resulting in a 45 seat shortage. However, as the IUSD has an excess of 758 middle school seats, the IUSD would be able to accommodate the 10 middle school students generated by the Proposed Project. The projected student enrollment with the Proposed Project would total 2,125 middle school students resulting in an excess of 748 seats. Due to the shortage of 25 high school seats, the IUSD would not be able to accommodate the 13 high school students generated by the Proposed Project. The projected student enrollment with the Proposed Project would total 2,117 high school students resulting in a 38 seat shortage.~~

**TABLE 3.13-9
 ADJUSTED BASELINE 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	5,265	(18)	27	5,292	(45)
Middle School (Grades 6-8)	2,873	2,115	758	10	2,125	748
High School (Grades 9-12)	2,079	2,104	(25)	13	2,117	(38)

NOTES:

- ^a Most recent school year information available.
- ^b Capacity based on classroom utilization information provided by the IUSD.
- ^c 2017-2018 student enrollment provided by the IUSD.

SOURCE: Inglewood Unified School District Commercial/Industrial Development School Fee Justification Study, dated May 17, 2018, prepared by Cooperative Strategies. Available: https://www.mijusd.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf.

Pursuant to Section 65995 of the California Government Code, the project applicant 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 school facilities, whether schools serving the Proposed Project in question are at capacity or not. Pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project’s ~~development impacts related to school facilities under CEQA~~.⁸⁶ As such, 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

⁸⁶ 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.”

maintain acceptable service ratios, response times, or other performance objectives. Therefore, with payment of SB 50 fees, impacts on schools would be **less than significant**.

Mitigation Measures

None required.

Cumulative Impacts

The geographic scope of analysis for cumulative impacts related to schools includes those past, present, and reasonably foreseeable cumulative projects within the boundaries of the IUSD. These cumulative projects located within the IUSD boundaries are included in Table 3.3-10.

Impact 3.13-12: Implementation of the Proposed Project, in combination with other development, could-would not 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.

Construction

Of the 130 cumulative projects listed in Appendix _____, 31 are located within the attendance boundaries of the IUSD. Construction activities associated with the cumulative projects would not adversely affect the 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.

Given the mobility and short durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate their families or their residences within this region or from other regions as a result of their work on the cumulative projects. As such, construction is not expected to result in a notable 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 avoid-creating of a new material demand for schools that could require construction of new facilities that could adversely affect the environment. Therefore, construction of the Proposed Project, along with the construction of past, present, and reasonably foreseeable projects, would have a **less than significant** cumulative impact on schools.

Operation

Operation of the Proposed Project, combined with the operations of past, present, and reasonable future projects, could have a significant impact on schools. Of the 130 cumulative projects, 31 are located within the attendance boundaries of the IUSD. **Table 3.13-10** presents the estimated students generated by the cumulative projects located within the IUSD, the number of students anticipated to be generated by the Proposed Project and the cumulative total. Similar to the

Commented [A31]: Consider moving table to Appendix that includes the foreseeable projects list plus the sublists by topic.

Proposed Project, the number of students anticipated to be generated by the cumulative projects was estimated based on the type of development proposed.

TABLE 3.13-10
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE CUMULATIVE DEVELOPMENT

Map No. ^a	Address	Project Development Characteristics	Elementary School ^{b,c}	Middle School ^{b,c}	High School ^{b,c}
41	664 E. Manchester Terrace	Four (4) new residential condominiums	0.5	0.2	0.2
42	844 N. Centinela Avenue	Four (4) new residential apartment units	0.5	0.2	0.2
43	501 E. 99th Street	SPR for 12 new condominiums	1.6	0.6	0.6
44	921 N. Edgewood Street	38-unit apartment building	5.0	2.1	2.0
45	222 W. Spruce Avenue	10 unit multifamily building	1.3	0.5	0.5
46	961 E. 68th Street	3 unit detached condominium development	0.4	0.2	0.2
47	417 N. Market Street	Two 6 unit condominium buildings	1.6	0.6	0.6
48	819 E. La Palma Drive	5 unit multifamily building	0.7	0.3	0.3
49	814 N. Market Street	18 bed congregate living facility	0	0	0
50	411 E. Hazel Street	18 unit multifamily building	2.4	1.0	1.0
51	329 E. Hazel Street	4-unit Condo with 10 parking spaces per SP-1229	0.5	0.2	0.2
53	3920 W. 108th Street	3 unit apartment building	0.4	0.2	0.2
54	125 E. Spruce Avenue	Seven (7) new apartment units with semi-subterranean parking	0.9	0.4	0.4
55	704 N. Market Street	12 new residential apartment units	1.6	0.6	0.6
56	408 E. Warren Lane	2-story 2,542 sf commercial building	0.1	0.0	0.0
57	508 S. Eucalyptus Avenue	40-unit senior affordable housing development	0.1	0.0	0.0
58	417-433 Centinela Avenue	116 unit apartment	15.3	6.3	6.2
60	101, 125, 139, 140, 150 Market Street	40,000 sf retail and 150 parking spaces	0.8	0.3	0.3
61	113-133 Plymouth Street	20-unit townhome development	2.6	1.1	1.1
62	333 N. Prairie Avenue	PAD to allow the 310 townhome units at the former Daniel Freeman site	40.8	16.7	16.6
63	705-715 N. Centinela Avenue	81,613 sf, approximately 400-unit, 5-story self-storage	52.7	21.6	21.4
64	3660 W. 107th Street	3 dwelling units with 6 car garages	0.4	0.2	0.2
65	614 E. Hyde Park Boulevard	18-bed congregate living facility	0.0	0.0	0.0
66	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	316 Hardy Street	5-unit condominium development	0.7	0.3	0.3
69	943-959 W. Hyde Park Boulevard	5-story self-storage facility	2.4	1.0	1.0

Commented [A32]: Correct that this is the portion of HPSP not included in the Adjusted Baseline?

Map No. ^a	Address	Project Development Characteristics	Elementary School ^{b,c}	Middle School ^{b,c}	High School ^{b,c}
70	8911 Aviation Boulevard	General Plan amendment for rental car facility	N/A	N/A	N/A
115	5301 W. Centinela Avenue	1,640 sf restaurant ("The Flame Broiler")	0.0	0.0	0.0
127	D3 SITE (La Brea Avenue/Florence Avenue)	241 dwelling units, 40,000 sf retail	32.5	13.3	13.2
129	3900 W Century Boulevard	Airport Park View Renovation	0.6	0.2	0.2
		Cumulative Projects^d	576	236	232
		Proposed Project	27	10	13
		Total^d	603	246	245

Notes:

- ^a Corresponds with Map Nos. on Figure 3.0-1 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.

SOURCE: Inglewood Unified School District Residential Development School Fee Justification Study, dated May 17, 2018, prepared by Cooperative Strategies. Available: https://www.myiUSD.net/wp-content/uploads/2018/05/FSRes_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.myiUSD.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf. Accessed January 2019; and ESA 2019.

As shown in Table 3.13-10, the cumulative projects are expected to generate approximately 576 elementary school students, 236 middle school students, and 232 high school students. The Proposed Project, in conjunction with the cumulative projects could therefore generate 603 elementary school students, 246 middle school students, and 245 high school students. Similar to the Proposed Project, this analysis is conservative as a portion of the Proposed Project's and cumulative projects' generated school-aged children may attend private, charter, or magnet schools, which would reduce attendance at IUSD schools.

**TABLE 3.13-11
 ADJUSTED BASELINE 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 + Cumulative Generated Students	Projected Student Enrollment for 2017-2018 Adjusted Baseline With Project + Cumulative	Projected Seating Excess/ (Shortage) for 2017-2018 Adjusted Baseline With Project + Cumulative
Elementary School (Grades K-5)	5,247	5,265	(18)	603	5,868	(621)
Middle School (Grades 6-8)	2,873	2,115	758	246	2,361	512
High School (Grades 9-12)	2,079	2,104	(25)	245	2,349	(270)

NOTES:

- ^a Most recent school year information available.
- ^b Capacity based on classroom utilization information provided by the IUSD.
- ^c 2017-2018 student enrollment provided by the IUSD.

SOURCE: 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.

Due to the shortage of 18 elementary school seats under Adjusted Baseline conditions, the IUSD would not be able to accommodate the 603 elementary school students generated by the Proposed Project plus cumulative development. The projected student enrollment with the Proposed Project plus cumulative development would total 5,868 elementary school students resulting in a 621 seat shortage. However, as the IUSD has an excess of 758 middle school seats under Adjusted Baseline conditions, the IUSD would be able to accommodate the 246 middle school students generated by the Proposed Project plus cumulative development. The projected student enrollment with the Proposed Project plus cumulative development would total 2,361 middle school students resulting in an excess of 512 seats. Due to the shortage of 25 high school seats under Adjusted Baseline conditions, the IUSD would not be able to accommodate the 13 high school students generated by the Proposed Project plus cumulative development. The projected student enrollment with the Proposed Project plus cumulative development would total 2,349 high school students resulting in a 270 seat shortage. However, pursuant to Section 65995 of the California Government Code, the Proposed Project and cumulative development projects 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 school facilities, whether schools serving the cumulative development in question are at capacity or not. Pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts related to school facilities under CEQA.

The Proposed Project does not include residential uses and instead would employ a total of 439 permanent employees and up to 1,320 event employees, who would likely come from the larger Los Angeles region and are not anticipated to move to the area, thereby and therefore are unlikely

to indirectly ~~increasing~~ ~~increase~~ enrollment at nearby schools. 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. Further, the project applicant would be required to pay development fees for schools to IUSD prior to the issuance of grading permits pursuant to SB 50. Pursuant to Government Code Section 65995(h), the payment of developer fees would be considered full and complete mitigation of school impacts. Therefore, the Proposed Project would not make a cumulatively considerable contribution to the need for the construction of new, or expanded school facilities in order to maintain performance objectives. As such, implementation of the Proposed Project, along with past, present, and reasonable foreseeable projects would have a **less than significant** cumulative impact on schools.

Mitigation Measures

None required.