

CHAPTER 3

Environmental Setting, Impacts, and Mitigation Measures

3.0 Introduction to the Analysis

This EIR evaluates the physical environmental effects that would potentially occur from implementation of the Proposed Project. The structure of the technical sections included in this chapter is discussed below, and definitions of key terms that are used throughout this EIR are provided. Comments that were received during the scoping period are summarized herein as well. In addition, this section includes a description of certain possible environmental impacts that are typically considered under CEQA, but are not analyzed in detail in this EIR because it was determined the Proposed Project would have no impact. This section also provides a discussion of the Adjusted Baseline Environmental Setting and the identification of other past, present, or reasonably foreseeable projects that are used in the analysis of cumulative impacts throughout this chapter.

3.0.1 Definitions of Terms Used in the EIR

This EIR uses a number of terms that have specific meaning under CEQA. Among the most important of the terms used in the EIR are those that refer to the significance of environmental impacts. The following terms describe environmental effects of the Proposed Project:

- **Significance Criteria:** A set of criteria used by the lead agency (City of Inglewood) to determine at what level or threshold an impact would be considered significant. Thresholds of significance are identifiable quantitative, qualitative, or performance levels of a particular environmental effect that are supported by substantial evidence.¹ Thresholds of significance used in this EIR include those standards provided by the City of Inglewood unless otherwise specifically defined.
- **No Impact:** No impact means that the Proposed Project would result in no direct or indirect adverse changes (or impacts) to the environment, with respect to the applicable significance criterion. A project impact with a no impact determination would also not contribute to a cumulative impact. Where the Proposed Project would not have an impact, the impact statement states this definitively.
- **Less-than-Significant Impact:** A project impact is considered less than significant when the physical change caused by the Proposed Project would not exceed the applicable significance criterion.

¹ CEQA Guidelines section 15064.7.

- **Potentially Significant Impact:** A potentially significant impact is identified where the Proposed Project may cause a substantial adverse change in the environment, depending on certain unknown conditions related to the Proposed Project or the affected environment. For CEQA purposes, a potentially significant impact is treated as if it were a significant impact. A project impact is considered potentially significant if the Proposed Project is anticipated to exceed identified standards of significance thereby result in a substantial adverse change in the physical conditions of the environment. Significant impacts are identified by the evaluation of project-related physical change compared to specified significance criteria. A significant impact is defined as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.”² In instances where potentially significant impacts are identified, the EIR must consider whether mitigation measures (as defined below) or alternatives to the Proposed Project would reduce those impacts.
- **Significant and Unavoidable Impact:** A project impact is considered significant and unavoidable if it would result in a substantial adverse physical change in the environment that cannot be feasibly mitigated to a less-than-significant level.
- **Cumulative Impact:** Under CEQA, a cumulative impact refers to “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”³ “A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.”⁴ A project has “cumulatively considerable” environmental effects (i.e., is significant) when “the incremental effects of [the] project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”⁵
- **Mitigation Measure:** Where a potentially significant impact or significant and unavoidable impact is identified, feasible mitigation measures that could minimize the identified significant adverse impact are required.⁶ A mitigation measure is an action that could be taken that would avoid or reduce the magnitude of a significant impact. CEQA Guidelines section 15370 defines mitigation as:
 - a. Avoiding the impact altogether by not taking a certain action or parts of an action;
 - b. Minimizing impacts by limiting the degree of magnitude of the action and its implementation;
 - c. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
 - d. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
 - e. Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

² CEQA Guidelines section 15382.

³ CEQA Guidelines section 15355.

⁴ CEQA Guidelines section 15130(a)(1).

⁵ CEQA Guidelines sections 15065(a)(3), 15130(a), 15064(h)(1).

⁶ CEQA Guidelines section 15126.4.

3.0.2 Section Format

Chapter 3 is divided into technical sections (e.g., Section 3.1, Aesthetics) that present for each environmental resource issue area the physical environmental setting, the regulatory setting, standards of significance from which impacts are measured, analytical methods, an evaluation of potential impacts to the environment, and, where required, potentially feasible mitigation measures for identified significant impacts. Each section includes an analysis of project-specific and cumulative impacts for each issue area.

The technical environmental sections each begin with a description of the Proposed Project’s **environmental setting** and the **regulatory setting** as it pertains to a particular issue. The environmental setting provides a point of reference for assessing the environmental impacts of the Proposed Project and its alternatives. The environmental setting describes existing conditions at the time the NOP was circulated for the Proposed Project (February 2018). An **Adjusted Baseline** is considered in this EIR (see discussion below in Section 3.0.5) to account for nearby development in the Hollywood Park Specific Plan area. The regulatory setting presents relevant information about federal, state, regional, and/or local laws, regulations, plans or policies that pertain to the environmental resources addressed in each section. Each technical environmental section includes a discussion of whether there are any inconsistencies between the Proposed Project and applicable general plans, specific plans, and regional plans.⁷

Next, each section presents **significance criteria**, which identify the standards used by the City of Inglewood to determine the significance of effects of the Proposed Project. CEQA Guidelines section 15064.7 states that “... a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

A **methodology and assumptions** description in each section presents the analytical methods and key assumptions used in the evaluation of effects of the Proposed Project, and is followed by an **impacts and mitigation measures** discussion. The impact and mitigation portion of each section includes one or more impact statements, prefaced by an impact number in bold-faced type. An explanation of each impact is followed by an analysis of its significance. The impact discussion ends with a concluding statement regarding the significance of the impact and any related need for mitigation measures (either none are required, or all potentially feasible mitigation measures are presented to reduce an identified significant effect). The description of mitigation measures concludes with a description of the significance of the impact after application of the mitigation measure(s): either implementation of the mitigation measure(s) would reduce the impact to a less-than-significant level, or the impact would remain significant and unavoidable after implementation of all potentially feasible mitigation measures.

The analysis of environmental impacts considers both the construction and operational phases associated with implementation of the Proposed Project. As required by CEQA Guidelines

⁷ CEQA Guidelines section 15125(d).

section 15126.2(a), direct, indirect, short-term, long-term, onsite, and/or off-site impacts are addressed, as appropriate, for the environmental issue area being analyzed. Depending on the significance criteria, the impact analysis may consist of a qualitative discussion, a quantitative analysis, or a combination of both. Detailed technical appendices are also provided for several technical sections, where appropriate, and can be located at the end of the document.

Mitigation measures pertinent to each individual impact, if necessary, appear after the impact discussion section. The magnitude of reduction of an impact and the potential effect of that reduction in magnitude on the significance of the impact is also disclosed. An example of the format is shown below.

Impacts and Mitigation Measures

Impact 3.X-1: Impact statement (significance conclusion)

In the impact statement, terminology is used to indicate the level of significance of the impact. If an impact is less than significant, then the impact statement would say that the Proposed Project “could” affect a resource. If an impact is potentially significant or significant and unavoidable, then the impact statement would say that the Proposed Project “would” affect a resource.

A discussion of the Proposed Project’s impact is provided in paragraph form. A statement level of significance before application of any mitigation measures is provided in **bold**.

Mitigation Measure 3.X-1

Mitigation measure presented in italics and numbered to match the impact number.

Level of Significance After Mitigation: This paragraph describes how the mitigation measure(s) reduces the impact and identifies the residual level of impact in **bold**.

Cumulative Impacts

CEQA Guidelines section 15130 requires that an EIR discuss cumulative impacts of a project when a project’s incremental effect is cumulatively considerable. As defined in CEQA Guidelines section 15355, a cumulative impact consists of an impact that is created as a result of the combination of a project evaluated in the EIR together with other past, present, and reasonably foreseeable projects causing related impacts. CEQA Guidelines section 15130(b) requires that the discussion of cumulative impacts shall “reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone.”

In each topical section of the EIR, an analysis of cumulative impacts follows the project-specific impacts and mitigation measures evaluation. An introductory discussion that identifies the cumulative impact methodology and defines the cumulative context being addressed in each respective analysis (e.g., the South Coast Air Basin, or the City of Inglewood) is included at the beginning of the cumulative impact analysis in each technical section. In some instances, a

project-specific impact may be considered less than significant, but its contribution to a larger impact may be determined to be potentially significant when considered in combination with other cumulative development of the surrounding area or in combination with regional growth projections. In some instances, a potentially significant impact may result at the project level but would not result in a cumulatively considerable contribution to a significant cumulative impact. The cumulative impacts analyses are formatted the same as the project-specific impacts, as shown above in Section 3.0.2.

3.0.3 Comments Received During Scoping

In response to the Notice of Preparation (NOP), the City of Inglewood received a total of 18 comment letters regarding the Proposed Project. Additionally, 57 written comments were provided during the public scoping meeting held on March 12, 2018. A number of scoping-related comments were also received following the close of the comment period. All scoping comments received are provided in Appendix B. Although a number specific comments were raised in the NOP comments, comments generally fell into several main categories:

- Vehicular traffic management, particularly along freeways and local roadways;
- Parking supply and availability;
- Potential impacts to public transit and public transit facilities;
- Potential impacts on the surrounding area that could occur from the Proposed Project's provision of entertainment, retail, office, and hotel uses;
- Secondary economic impacts of the Proposed Project with respect to affordable housing;
- Adequate provision of public services and utilities;
- Noise and air quality impacts as a result of construction of the Proposed Project; and
- Cumulative impacts of the Proposed Project and other large venues nearby holding concurrent events.

The issues raised in these comments are addressed as appropriate in the EIR under the applicable environmental topic.

3.0.4 Effects Not Found to Be Significant

CEQA requires that the EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore not discussed in detail.⁸ Upon review of the Proposed Project, with consideration given to comments received during the scoping period as summarized in Appendix B, the City of Inglewood determined that, due to the physical characteristics of the Project Site and the Proposed Project, there would be no significant impact in certain specific environmental topic areas; therefore, these

⁸ CEQA Guidelines section 15128.

topics need not be further considered in the Draft EIR.⁹ The discussions below provide brief statements of reasons, supported by citations, for the City's determination that these issues do not warrant further consideration in the EIR.

Agricultural and Forestry Resources

A significant impact to Agricultural and Forestry Resources would occur if the Proposed Project would:

1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract;
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));
4. Result in the loss of forest land or conversion of forest land to non-forest use; or
5. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. (No Impact)

The area surrounding the Project Site is characterized by dense urban development, as well as vacant, undeveloped parcels that were previously developed over many years and more recently cleared for redevelopment. The Project Site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively referred to as "Farmland"), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.¹⁰ As such, the Proposed Project would not convert Farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. There would be **no project-level or cumulative impacts**.

⁹ Public Resources Code section 21003(e) states that "[t]o provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a proposed project, lead agencies shall, in accordance with section 21100, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant."

¹⁰ California Department of Conservation Division of Land Resource Protection, 2016. California Important Farmland Finder. Available: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed September 24, 2018.

The Proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. (No Impact)

The Project Site is not included in the most recently released map showing Williamson Act contracts within Los Angeles County¹¹ and no portions of the Project Site are subject to a Williamson Act contract. The Proposed Project would not conflict with existing zoning for agricultural use, and would not conflict with a Williamson Act contract. There would be **no project-level or cumulative impacts**.

The Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). (No Impact)

The Project Site is not zoned for timberland or timberland production by the City of Inglewood. Therefore, the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. There would be **no project-level or cumulative impacts**.

The Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. (No Impact)

The Project Site is characterized by dense, urban development. The Project Site is not located on land that is zoned as forest land, either by the County of Los Angeles or by the City of Inglewood. As discussed above, since the Project Site is not irrigated and is surrounded by urban land, it is classified as Urban Land by the Natural Resources Conservation Service.¹² Therefore, implementation of the Proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use. There would be **no project-level or cumulative impacts**.

The Proposed Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. (No Impact)

As discussed above, the Project Site is located within an urban environment characterized by dense development. The Project Site is not zoned as Farmland, and is classified as Urban Land. The Project Site is not under a Williamson Act contract. The Project Site is not zoned for agricultural use, nor is it designated for timberland, timberland production, or as forest land. Additionally, the Project Site is not currently utilized for agriculture, timberland or timberland production, or forest land. As such, the Proposed Project would not involve other changes in the existing environment which, due to their location or nature, could result in the conversion of

¹¹ California Department of Conservation Division of Land Resource Protection, 2016. Los Angeles County Williamson Act FY 2015/2016 Map. Available: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf. Accessed September 24, 2018.

¹² United States Department of Agriculture, Natural Resources Conservation Service, 2018. Web Soil Survey, Farmland Classification of Los Angeles County, California, Southeastern Part. Available: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed May 15, 2018.

Farmland to non-agricultural use and would not result in the conversion of forest land to non-forest use. There would be **no project-level or cumulative impacts**.

Mineral Resources

A significant impact to Mineral Resources would occur if the Proposed Project would:

1. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or
2. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

The Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. (No Impact)

The Project Site is in a Mineral Resource Zone (MRZ) classified as MRZ-1, which covers those areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.^{13,14,15,16} Although the Project Site is located within the San Gabriel Production-Consumption Region, the Project Site is not located within a MRZ-2 zone, which would indicate that significant mineral resources are present.¹⁷ Construction and operation of the Proposed Project would not result in the loss of availability of any known mineral resource that would be of value to the region and the residents of the state. There would be **no project-level or cumulative impacts**.

The Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. (No Impact)

As discussed above, the Project Site is located within a MRZ-1 zone, which indicates that there is little likelihood that the Project Site contains significant mineral resources. The Project Site is not delineated or designated by the City of Inglewood as a locally important mineral resource recovery

-
- ¹³ California Department of Conservation, 1982. California Department of Mines and Geology, Mineral Land Classification Map, Aggregate Resources Only, Inglewood Quadrangle, Special Report 143, Plate 4-15. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIV/. Accessed September 25, 2018.
 - ¹⁴ California Department of Conservation, 1982. California Department of Mines and Geology, California Geological Survey, Mineral Land Classification of the Greater Los Angeles Area, Part IV: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region, Special Report 143, Part IV. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIV/. Accessed September 25, 2018.
 - ¹⁵ California Department of Conservation, 2010. California Department of Mines and Geology, Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California, Special Report 209, Plate 1: San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/. Accessed September 25, 2018.
 - ¹⁶ California Department of Conservation, 2010. California Department of Mines and Geology, California Geological Survey, Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California, Special Report 209. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/. Accessed September 25, 2018.
 - ¹⁷ California Department of Conservation, 2010. California Department of Mines and Geology, Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California, Special Report 209, Plate 1: San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/. Accessed: September 25, 2018.

site. Construction and operation of the Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. There would be **no project-level or cumulative impacts**.

Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, a significant impact related to wildfires would occur if the Proposed Project would:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan;
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

The Project Site is not located within or near an area designated as a state responsibility area¹⁸ nor is it classified as very high fire hazard severity zone or located near a very high fire hazard severity zone.¹⁹ Therefore, there would be **no project-level or cumulative impact**.

3.0.5 Adjusted Baseline

CEQA Guidelines section 15125 provides that an EIR must include a description of the physical environmental conditions in the project vicinity. It also allows for a lead agency to define existing conditions by conditions expected when the project becomes operational, when supported by substantial evidence. The Proposed Project is not expected to be complete and operational until mid-2024. At this time, the City of Inglewood has issued building permits for, and construction has commenced on, significant portions of the Hollywood Park Specific Plan (HPSP) located immediately north of the Project Site, including the construction of a 70,000-seat open air NFL Stadium, a 6,000-seat performance venue, 518,077 square feet (sf) of retail and restaurant uses, 466,000 sf of office space, 314 residential units, an 11.89-acre park, a 4-acre civic use, and approximately 9,900 parking spaces, collectively known as the HPSP Adjusted Baseline projects (see **Table 3.0-1**).²⁰

¹⁸ California Department of Forestry and Fire Protection, 2019. State Responsibility Area Viewer. Available: <https://bofdata.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/>. Accessed February 27, 2019.

¹⁹ California Department of Forestry and Fire Protection, 2019. Wildland Hazard & Building Codes, California Fire Hazard Severity Zone Map Update Project. Available: <https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>. Accessed: February 27, 2019.

²⁰ Additional development at the remaining parts of the HPSP area is planned for the future. This additional future HPSP development is included as Cumulative Project #67 in Table 3.0-2, below.

**TABLE 3.0-1
 HPSP ADJUSTED BASELINE PROJECTS**

| Land Use | Adjusted Baseline Projects^a | Estimated Operational Date^b |
|-----------------|---|---|
| Retail | 518,077 sf | September 2021 |
| Office | 466,000 sf | September 2021 |
| Residential | 314 units | May 2021 |
| NFL Stadium | 70,000 seats (2,772,304 sf) | Summer 2020 |
| Perform. Venue | 6,000 seats | Summer 2020 |
| Open Space | 11.89 ac | Summer 2020 |
| Civic Use | 4 ac | Summer 2020 |

NOTES:
^a Trifiletti Consulting, Inc., Related Project List Methodology for the Proposed Inglewood Basketball and Entertainment Center (IBEC), July 12, 2019.
^b Operational schedules for the HPSP Adjusted Baseline projects provided by the HPSP in a project schedule dated May 8, 2019.

Because of current and anticipated construction schedules, the City is reasonably certain that the HPSP Adjusted Baseline projects will be built and operational between summer 2020 and September 2021 when construction of the Proposed Project is expected to be underway, and prior to 2024 when operation of the Proposed Project would start. The NFL Stadium and performance venue will be operational by the summer 2020. Residential units will be operational in May 2021, with retail and office elements operational by September 2021. The open space and civic uses will be operational by summer 2020.

Construction and operation of the HPSP Adjusted Baseline projects will change the physical conditions that currently exist in the vicinity of the Project Site for most of the environmental topics addressed in this EIR. Due to the reasonable certainty that the HPSP Adjusted Baseline projects will be constructed and in operation prior to construction and operation of the Proposed Project, the City has determined that assuming the HPSP Adjusted Baseline projects in the baseline provides the most accurate picture of the Proposed Project’s impacts and that it would be misleading to disregard the HPSP Adjusted Baseline projects in the environmental setting. Accordingly, the changes associated with HPSP Adjusted Baseline projects are considered as part of the Adjusted Baseline Environmental Setting, which is the baseline against which the Proposed Project’s potential impacts are measured. How these changes affect the environmental setting is further described in each topical section under the heading Adjusted Baseline Environmental Setting.

Adjusted Baseline Transportation Assumptions

In addition to the development projects described above, improvements in the local transportation system are reasonably certain to be undertaken and operational prior to the commencement of operations for the Proposed Project, as described further below and in Section 3.14, Transportation and Circulation.

Roadways

A number of physical improvements are required as mitigations and/or conditions of approval of the Hollywood Park Specific Plan, are related to the City's ongoing Century Boulevard Improvement Plan, or are associated with the Crenshaw/LAX LRT project. These improvements either are under construction, or are approved and funded and scheduled; the improvements will be in place under all adjusted baseline condition scenarios. The full list of improvements is described further in Section 3.14, Transportation and Circulation, and presented in Table 3.14-13.

Transit

The adjusted baseline conditions transit network will differ considerably from existing conditions due to completion of the Crenshaw/LAX LRT prior to 2024. With this completion and the potential for a future Green Line South Bay extension, Metro is evaluating multiple operating scenarios, which would affect the routing of the trains, number of train cars, and potential peak and off-peak headways. The Metro board has currently approved Alternative C-3 for a 2-year pilot program; therefore, ridership forecasts for Alternative C-3 for a 2025 condition were used to represent the Adjusted Baseline condition. Alternative C-3 recommends an interline train between existing Norwalk Station (Green Line) and Expo/Crenshaw, and a short line train between Willowbrook/Rosa Parks Station and Redondo Beach Station (Green Line).

Metro is also studying changes to its bus system through the NextGen Bus study, but future changes to bus service are not yet defined and so would be speculative to assume. Therefore, the adjusted baseline conditions analysis assumes the existing bus routes that serve the Project Site will remain in operation at opening year of the Proposed Project.

3.0.6 Cumulative Assumptions

Pursuant to CEQA Guidelines section 15130(b)(1), either of the following are necessary to an adequate discussion of significant cumulative impacts:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing the cumulative effect.

This EIR conservatively considers both approaches where appropriate in this EIR, as described further below and evaluated specifically in each environmental resource topic.

Regional Growth Projections

The Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally designated metropolitan planning organization. SCAG region includes six counties, including the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Region wide, the population grew from 14.64 million people in 1990 to 16.52 million in 2000, a growth rate of nearly 1.28 percent per year. From 2000 to 2010, while the population of Inglewood dropped at an average rate of

0.3 percent per year, the region grew at an average rate of 1.03 percent per year. From 2010 to 2019, regionwide population growth slowed to an average of 0.61 percent per year, reaching a total of 19.16 million people in 2019.²¹

The 2016 RTP/SCS forecasts regionwide population growth to nearly 22.14 million as of 2040, which would represent an average growth rate of 0.73 percent per year from 2019, similar to potential citywide growth.²² According to SCAG's 2016 RTP/SCS growth forecast, the City is expected to see its population grow to 129,000 people in 2040, a 17 percent increase from 2017.²³

Cumulative Project List

The City published the NOP in February 2018. Following publication of the NOP, identification of cumulative projects focused on those projects that were proposed as of May 2018. This time frame coincides with the commencement of the City's environmental review process for the Proposed Project.

Table 3.0-2 provides a list of all past, present, and reasonably foreseeable projects. **Figure 3.0-1** identifies the locations of these cumulative projects. To understand the Proposed Project's contribution to cumulative impacts, the City, in consultation with other surrounding jurisdictions, has assembled a list of other known past, present, and reasonably foreseeable cumulative projects in the vicinity of the Project Site. Projects on this list consist of development projects within the City or other identified surrounding jurisdictions that have a pending development application, are approved, or are under construction, and transit and related infrastructure improvement projects that have been approved or proposed and under review.

As shown in **Table 3.0-3**, in total the Cumulative Projects List documents 145 projects with anticipated development of 1,903,815 sf of retail/commercial space, 8,675,487 sf of office space, 2,070,210 sf of industrial/warehouse/data center space, 9,315 residential units or beds, approximately 2,430 hotel rooms, and new or expanded schools to accommodate 6,401 students.

²¹ State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011–2019. Sacramento, California, May 2019. Available: <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5>.

²² As shown in SCAG's 2016-2040 RTP/SCS Demographics & Growth Forecast Appendix, Table 8, the population forecasts indicate an average annual growth for the entire SCAG region between 2000 and 2040 of 0.73%. The highest growth rates are projected to be in counties that are peripheral in the region, including Imperial, Riverside, and San Bernardino Counties. Los Angeles County, by contrast, is projected to have the lowest growth rate projected over that period of the six counties in the region, at only 0.45% per year. Further, SCAG projects population growth to be slower in the 2015 to 2040 period, 0.57% regional per year instead of 0.73% for the full 2000–2040 period.

In addition, growth within Los Angeles County also varies depending on location. The traffic growth rate of 0.23% per year used in the Transportation analysis presented in Section 3.14 is from the Los Angeles Metro Congestion Management Plan specifically for the South Bay/LAX Regional Statistical Area (RSA) in which Inglewood is located. The South Bay/LAX RSA is projected to be one of the slower growing areas in LA County. In general, the inland areas of the region (Palmdale/Lancaster/Santa Clarita, Pomona) are projected to be the fastest growing areas in Los Angeles County, resulting in an overall regional average growth rate of 0.73%.

²³ Southern California Association of Governments, 2016. 2016 RTP/SCS Growth Forecast by Jurisdiction.

**TABLE 3.0-2
CUMULATIVE PROJECTS LIST**

| No. | Project Location | Jurisdiction | Land Use | Size |
|-----|---|--------------|----------------------------------|----------------|
| 1 | 6161 W. Centinela Boulevard | Culver City | Office | 281.209 ksf |
| 2 | 12712-12718 Washington Boulevard | Culver City | Apartments | 5 units |
| | | | Retail | 3.414 ksf |
| | | | Commercial | 2.340 ksf |
| 3 | 6002 Centinela Avenue | Culver City | Service Bays | 14.668 ksf |
| | | | Parts and Service | 12.900 ksf |
| 4 | 6201 Bristol Parkway | Culver City | Commercial | 16.000 ksf |
| | | | Apartments | 775 units |
| | | | Hotel | -60.000 ksf |
| 5 | 888, 892, and 898 N. Sepulveda Boulevard | El Segundo | Hotel | 190 rooms |
| 6 | El Segundo South Campus Specific Plan – 2000-2100 East El Segundo Boulevard | El Segundo | Office | 1,751.921 ksf |
| | | | Warehouse | 73.577 ksf |
| | | | Retail | 148.960 ksf |
| 7 | 199 Continental Boulevard | El Segundo | Hotel | 152 rooms |
| 8 | 2265 E. El Segundo Boulevard | El Segundo | Warehouse | -3.050 ksf |
| | | | Office | 3.050 ksf |
| 9 | 400 Duley Road | El Segundo | Office | 73.000 ksf |
| 10 | 2275 Mariposa Avenue | El Segundo | Corporate Office | 52.000 ksf |
| | | | Athletic Training Facility | 68.300 ksf |
| 11 | 201 N. Douglas | El Segundo | High School | 1,200 students |
| | | | High School | -90.000 ksf |
| 12 | 2125 Campus Drive | El Segundo | Hotel | 121.450 ksf |
| | | | Office | 63.550 ksf |
| 13 | 535 Indian Street | El Segundo | Condominiums | 4 units |
| 14 | 1700 E. Imperial Avenue | El Segundo | Office | 96.898 ksf |
| 15 | 710 N. Nash Street | El Segundo | Office | 611.545 ksf |
| | | | Retail | 13.660 ksf |
| 16 | 1950 E. Grand Avenue | El Segundo | Office | 93.569 ksf |
| 17 | 445 N. Douglas Street | El Segundo | Office | 106.000 ksf |
| | | | Warehouse Industrial Data Center | 117.000 ksf |
| 18 | 101 Continental Boulevard | El Segundo | Hotel | 167 rooms |
| 19 | 444 N. Nash Street | El Segundo | Data Center | 180.422 ksf |
| 20 | SE Aviation Boulevard | El Segundo | Condominiums | 525 units |
| | | | Office | -835.000 ksf |
| 21 | 425-429 Indiana Street | El Segundo | Apartments | 8 units |
| 22 | NE Sepulveda Boulevard | El Segundo | Retail | 67.000 ksf |

**TABLE 3.0-2
 CUMULATIVE PROJECTS LIST**

| No. | Project Location | Jurisdiction | Land Use | Size |
|-----|--|--------------|--|--------------|
| 23 | 55 Continental Boulevard and 1955 E. Grand Avenue | El Segundo | Office Tower | 300.000 ksf |
| 24 | 1960 E. Grand Avenue | El Segundo | Hotel | 150 rooms |
| 25 | 525 N. Sepulveda Boulevard | El Segundo | Hotel Expansion | 6.952 ksf |
| 26 | 900, 950 Sepulveda Boulevard | El Segundo | Warehouse | 20.819 ksf |
| | | | Office | 139.558 ksf |
| | | | Manufacturing | 14.025 ksf |
| 27 | 600-630 N. Sepulveda Boulevard | El Segundo | Fast Food Restaurant with Drive-Through | 3.714 ksf |
| 28 | 2130 E. Maple Avenue | El Segundo | Office | 20.955 ksf |
| 29 | 555 N. Nash Street | El Segundo | Ice Skating Rink | 17.315 ksf |
| 30 | 14321 Van Ness Avenue | Gardena | Townhomes | 40 townhomes |
| 31 | 1720 W. 135th Street | Gardena | Industrial | 100.438 ksf |
| 32 | 13919 Normandie Avenue | Gardena | Single Room Occupancy | 20 units |
| 33 | 525 E. Rosecrans Avenue | Gardena | Retail | 3.140 ksf |
| 34 | Aviation Boulevard/El Segundo Boulevard | Hawthorne | Condominiums | 610 units |
| 35 | 4500 W. 116th Street | Hawthorne | Condominiums | 116 units |
| 36 | 13806 Hawthorne Boulevard | Hawthorne | Apartments | 171 units |
| | | | Office | 32.500 ksf |
| 37 | Crenshaw Boulevard/Jack Northrop Avenue | Hawthorne | Dwelling Units | 230 units |
| | | | Restaurant | 3.700 ksf |
| 38 | 14000 Yukon Avenue | Hawthorne | Apartments | 6 units |
| 39 | 4427 El Segundo Boulevard | Hawthorne | Hotel | 350 rooms |
| 40 | 11519 Acacia Avenue | Hawthorne | Hotel | 119 rooms |
| 41 | 14135 Cersie Avenue | Hawthorne | Apartments | 241 units |
| 42 | 664 E. Manchester Terrace | Inglewood | Condominiums | 4 units |
| 43 | 844 N. Centinela Avenue | Inglewood | Apartments | 4 units |
| 44 | 501 E. 99th Street | Inglewood | Condominiums | 12 units |
| 45 | 921 N. Edgewood Street | Inglewood | Apartments | 38 units |
| 46 | 222 W. Spruce Avenue | Inglewood | Apartments | 10 units |
| 47 | 961 E. 68th Street | Inglewood | Condominiums | 3 units |
| 48 | 417 N. Market Street | Inglewood | Condominiums | 12 units |
| 49 | 819 E. La Palma Drive | Inglewood | Apartments | 5 units |
| 50 | 814 N. Market Street | Inglewood | Congregate Living Facility | 18 beds |
| 51 | 411 E. Hazel Street | Inglewood | Apartments | 18 units |
| 52 | 329 E. Hazel Street | Inglewood | Condominiums | 4 units |

**TABLE 3.0-2
 CUMULATIVE PROJECTS LIST**

| No. | Project Location | Jurisdiction | Land Use | Size |
|-----------------|---|--------------|-------------------------------------|---------------|
| 53 | 11111 S. Prairie Avenue | Inglewood | Hotel | 120 rooms |
| 54 | 3920 W. 108th Street | Inglewood | Apartments | 3 units |
| 55 | 125 E. Spruce Avenue | Inglewood | Apartments | 7 units |
| 56 | 704 N. Market Street | Inglewood | Apartments | 12 units |
| 57 | 408 E. Warren Lane | Inglewood | Commercial | 2,542 ksf |
| 58 | 508 S. Eucalyptus Avenue | Inglewood | Senior Housing | 40 units |
| 59 | 417-433 Centinela Avenue | Inglewood | Apartments | 116 units |
| 60 | 721 N. La Brea Avenue | Inglewood | Commercial | 1,312 ksf |
| | | | Commercial | -1,210 ksf |
| 61 | 101,125,139,140,150 Market Street | Inglewood | Retail | 40,000 ksf |
| 62 | 113-133 Plymouth Street | Inglewood | Townhomes | 20 units |
| 63 | 333 N. Prairie Avenue | Inglewood | Townhomes | 310 units |
| 64 | 705-715 N. Centinela Avenue | Inglewood | Self-Storage | 81,613 ksf |
| 65 | 3660 W. 107th Street | Inglewood | Dwelling Units | 3 units |
| 66 | 614 E. Hyde Park Boulevard | Inglewood | Congregate Living Facility | 18 beds |
| 67 ^a | 1050 S. Prairie Avenue (HPSP Remaining Development) | Inglewood | Residential | 2,186 units |
| | | | Retail | 371,923 ksf |
| | | | Office | 3,567,314 ksf |
| | | | Hotel | 300 rooms |
| | | | Open Space | 13.06 acres |
| 68 | D3 SITE (La Brea Avenue/Florence Avenue) | Inglewood | Apartments | 243 units |
| | | | Retail | 40,000 ksf |
| 69 | 101 S. La Brea | Inglewood | Philharmonic Association | 25,500 ksf |
| 70 | 316 Hardy Street | Inglewood | Condominiums | 5 units |
| 71 | 943-959 W. Hyde Park Boulevard | Inglewood | Self-Storage | 159,498 ksf |
| 72 | 8911 Aviation Boulevard | Inglewood | Car Rental | 173,804 ksf |
| 73 ^b | 3900 W. Century Boulevard | Inglewood | Hotel | 4 rooms |
| 74 | Market Street/Manchester Blvd/ S. Prairie Ave | Inglewood | Inglewood Transit Connector Project | |
| 75 | 5206 W. Thornburn Street | Los Angeles | Elementary to Middle Private School | 50 students |
| 76 | 9800 S. Sepulveda Boulevard | Los Angeles | Hotel | 178 rooms |
| 77 | 10701 S. La Cienega Boulevard | Los Angeles | Bus Facility | 1,006,236 ksf |
| 78 | 7407 S. La Tijera Boulevard | Los Angeles | Apartments | 140 units |
| | | | Retail | 2,600 ksf |
| 79 | 8740 S. La Tijera Boulevard | Los Angeles | Apartments | 137 units |

**TABLE 3.0-2
CUMULATIVE PROJECTS LIST**

| No. | Project Location | Jurisdiction | Land Use | Size |
|-----|------------------------------|--------------|---|--------------|
| 80 | 8521 S. Sepulveda Boulevard | Los Angeles | Fast Food Restaurant with Drive-Through | 3.399 ksf |
| 81 | 6801 Center Drive | Los Angeles | Apartments | 600 units |
| 82 | 1 World Way | Los Angeles | Land Access Modernization Program | - - |
| 83 | 8721 S. Broadway | Los Angeles | Senior Housing | 108 units |
| | | | Retail | 4.000 ksf |
| 84 | 5975 S. Western Avenue | Los Angeles | Industrial | 225.000 ksf |
| 85 | 1636 W. Manchester Avenue | Los Angeles | Office | 68.250 ksf |
| 86 | 8540 S. La Tijera Boulevard | Los Angeles | Middle School | 525 students |
| 87 | 8705 S. Western Avenue | Los Angeles | Middle School | 616 students |
| 88 | 8400 S. Vermont Avenue | Los Angeles | Shopping Center | 740.000 ksf |
| 89 | 9402 S. Broadway | Los Angeles | Senior Housing | 49 units |
| 90 | 8415 S. Hoover Street | Los Angeles | Condominiums | 142 units |
| | | | Apartments | 57 units |
| | | | Recreational Center | 11.550 ksf |
| | | | Retail | 7.500 ksf |
| | | | Bank | 1.500 ksf |
| | | | Office | 15.400 ksf |
| 91 | 5816 S. Western Avenue | Los Angeles | Fueling Positions | 4 positions |
| | | | Convenience Store | 1.835 ksf |
| 92 | 505 W. Century Boulevard | Los Angeles | Fueling Position | 6 positions |
| 93 | 6733 Sepulveda Boulevard | Los Angeles | Apartments | 176 units |
| 94 | 5208 W. Centinela Avenue | Los Angeles | Fast Food Restaurant with Drive-Through | 4.642 ksf |
| 95 | 6711 S. Sepulveda Boulevard | Los Angeles | Apartments | 180 units |
| 96 | 6855 S. La Cienega Boulevard | Los Angeles | Supermarket | 22.590 ksf |
| 97 | 11604 Aviation Boulevard | Los Angeles | Condominiums | 281 units |
| | | | Retail/Commercial | 26.500 ksf |
| | | | Apartments | 112 units |
| 98 | 1248 W. 105th Street | Los Angeles | Apartments | 74 units |
| 99 | 3816 W. 54th Street | Los Angeles | Office Expansion | 1.196 ksf |
| 100 | 1252 W. 105th Street | Los Angeles | Apartments | 74 units |
| 101 | 11814 Aviation Boulevard | Los Angeles | Hotel | 128 rooms |
| 102 | 11034 S. Western Avenue | Los Angeles | Laundromat | 4.983 ksf |
| 103 | 5550 S. La Brea Avenue | Los Angeles | Apartments | 32 units |
| 104 | 12000 S. Western Avenue | Los Angeles | Hotel | 44 rooms |
| 105 | 1743 Imperial Highway | Los Angeles | Apartments | 39 units |
| 106 | 10601 S. Vermont Street | Los Angeles | Laundromat | 4.500 ksf |

**TABLE 3.0-2
CUMULATIVE PROJECTS LIST**

| No. | Project Location | Jurisdiction | Land Use | Size |
|-----|--|--------------|------------------------------------|-------------|
| 107 | 1423 W. 120th Street | Los Angeles | Condominiums | 57 units |
| 108 | 1509 W. 102nd Street | Los Angeles | Apartments | 12 units |
| 109 | 1539 W. 102nd Street | Los Angeles | Apartments | 10 units |
| 110 | 10501 S. Buford Avenue | Los Angeles | Townhomes | 11 units |
| 111 | 11824 Aviation Boulevard | Los Angeles | Apartments | 36 units |
| 112 | 10505 Hawthorne Boulevard | Los Angeles | Apartments | 32 units |
| 113 | 10609 S. Inglewood Avenue | Los Angeles | Apartments | 9 units |
| 114 | 10907 S. Inglewood Avenue | Los Angeles | Apartments | 4 units |
| 115 | 8910 S. Normandie Avenue | Los Angeles | Apartments | 6 units |
| 116 | 10136 Felton Avenue | Los Angeles | Apartments | 19 units |
| 117 | 5053 E. 109th Street | Los Angeles | Condominiums | 17 units |
| 118 | 9223 S. Vermont Avenue | Los Angeles | Auto Repair | 2,858 ksf |
| 119 | 5301 W. Centinela Avenue | Los Angeles | Restaurant | 1,640 ksf |
| 120 | 3838 W. Slauson Avenue | Los Angeles | Convenience Store | 1,060 ksf |
| 121 | 5101 Overhill Drive | Los Angeles | Condominiums | 88 units |
| 122 | 1240 W. 105th Street | Los Angeles | Apartments | 42 units |
| 123 | 6109 Overhill Drive | Los Angeles | Duplex | 2 units |
| 124 | 1034 W. 109th Place | Los Angeles | Apartments | 9 units |
| 125 | 11408-11412 S. New Hampshire Avenue | Los Angeles | Gas Station with Convenience Store | 2,900 ksf |
| 126 | 10335 S. Vermont Avenue | Los Angeles | Church | 1,324 ksf |
| 127 | 10401 S. Vermont Avenue | Los Angeles | Commercial | 0.250 ksf |
| | | | Apartments | 1 units |
| 128 | 1023 W. 107th Street | Los Angeles | Apartments | 8 units |
| 129 | LAX Northside Project Westchester Parkway between Pershing Drive and Sepulveda Boulevard | Los Angeles | Office | 612,500 ksf |
| | | | Playing Fields | 5 fields |
| | | | Dog Park | 1 field |
| | | | Retail | 270,000 ksf |
| | | | Research and Development | 612,500 ksf |
| | | | Civic Site | 215,000 ksf |
| | | | Park | 130,680 ksf |
| 130 | Bounded by W. Century Boulevard, La Cienega Boulevard, Arbor Vitae Street, and Vicksburg Avenue | Los Angeles | Office | 300,000 ksf |
| | | | Hotel | 400 rooms |
| | | | Retail | 200,000 ksf |
| | | | Conference Center | 100,000 ksf |
| 131 | 10341 Graham Avenue | Los Angeles | Theater | 1,000 seats |
| | | | Education Center | 12,417 ksf |
| 132 | 3831 W. Stocker Street | Los Angeles | Apartments | 127 units |

**TABLE 3.0-2
CUMULATIVE PROJECTS LIST**

| No. | Project Location | Jurisdiction | Land Use | Size |
|-------------------|--------------------------------------|--------------------|--------------------------------|----------------|
| 133 | 3900 W. Martin Luther King Boulevard | Los Angeles | Office | 50.00 ksf |
| | | | Condominiums | 200 units |
| | | | College | 3,600 students |
| 134 | 4018 S. Buckingham Road | Los Angeles | Senior Housing | 130 units |
| 135 | 4115 W. Martin Luther King Boulevard | Los Angeles | Middle School | 500 students |
| 136 | 4252 S. Crenshaw Boulevard | Los Angeles | Apartments | 111 units |
| 137 | 5950 W. Jefferson Boulevard | Los Angeles | Office | 64,000 ksf |
| | | | Retail | 4,000 ksf |
| | | | Quality Restaurant | 2,000 ksf |
| | | | High Turnover Restaurant | 2,000 ksf |
| 138 | 6024 W. Jefferson Boulevard | Los Angeles | Office | 123,572 ksf |
| | | | Manufacturing | 64,206 ksf |
| | | | Coffee Shop with Drive-Through | 2,200 ksf |
| 139 | 6100 S. Hoover Street | Los Angeles | Laundromat | 6,500 ksf |
| | | | Self-Service Car Wash | 2,328 ksf |
| 140 | 2178 Firestone Boulevard | Los Angeles County | Residential Care | 16 beds |
| 141 | 905 E. El Segundo Boulevard | Los Angeles County | Community Center | 1,000 ksf |
| | | | Amphitheater and Lawn | 1,100 seats |
| | | | Music Center | 1,000 ksf |
| | | | Nature Lab | 1,000 ksf |
| | | | Museum – Gallery | 1,000 ksf |
| | | | Museum – Art Storage | 1,000 ksf |
| | | | Aquatic Center | 1,000 ksf |
| | | | Gymnasium | 1,000 ksf |
| | | | Multi-Purpose Stadium | 3,000 seats |
| | | | Outdoor Athletic Fields | 3 fields |
| Equestrian Center | 85 stables | | | |
| 142 | 1854 E. 118th Street | Los Angeles County | Apartments | 100 units |
| 143 | 13200 S. Avalon Boulevard | Los Angeles County | Homeless Shelter | 79 rooms |
| 144 | 11735 Holmes Avenue | Los Angeles County | Apartments | 61 units |
| 145 | 14733 S. Stanford Avenue | Los Angeles County | Apartments | 85 units |

NOTES:

^a This HPSP Remaining Development (Cumulative Project #67) is in addition to HPSP Adjusted Baseline Environmental Setting projects identified in Table 3.0-1. The square footages, units, and hotel rooms presented here include the remaining uses in the HPSP, after completion of the HPSP Adjusted Baseline development, as shown above in Table 3.0-1.

^b Cumulative Project #73 involves the renovation of an existing 178-room hotel, and would add 4 rooms to a new total of 182.

SOURCE: Trifiletti Consulting, Inc., Related Project List Methodology for the Proposed Inglewood Basketball and Entertainment Center (IBEC), July 12, 2019.



SOURCE: Open Streetmap, 2018; ESA, 2019.

Inglewood Basketball and Entertainment Center

Figure 3.0-1
Approximate Locations of Cumulative Projects



TABLE 3.0-3
CUMULATIVE PROJECTS LIST DEVELOPMENT SUMMARY

| Land Use | Cumulative Projects^a |
|----------------------------------|--|
| Retail/Commercial | 1,903,815 sf |
| Office | 8,675,487 sf |
| Industrial/Warehouse/Data Center | 2,070,210 sf |
| Residential | 9,315 units/beds |
| Hotel | 2,430 rooms |
| Schools | 6,401 students |

NOTES:

^a Hotel square footage, where provided, was translated into rooms at 1 room per 1,000 sf.