FEBRUARY 2017

# Final Environmental Impact Report

[FINAL EIR]
[STATE CLEARINGHOUSE NO. 2015021014]

## for Los Angeles International Airport (LAX) Landside Access Modernization Program

City of Los Angeles
Los Angeles World Airports

## Volume 11:

Responses to Comments, Corrections & Additions to the Draft EIR

*Los Angeles World Airports*

# Table of Contents



# List of Attachments

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# Preface

This document, in conjunction with the previously prepared documents described below, constitutes the Final Environmental Impact Report (Final EIR) for the Los Angeles International Airport (LAX or Airport) Landside Access Modernization Program (proposed Project). As further described in the Introduction of this document, the LAX Landside Access Modernization Program consists of several primary components. At the centerpiece is an Automated People Mover (APM) system with 6 stations, which would provide access to the Central Terminal Area (CTA) for passengers, employees and other users of LAX, 24 hours a day. The APM system would transport passengers between the CTA and the other main components of the Project located east of the CTA, including a state-of-the-art Consolidated Rental Car Facility (CONRAC), and two Intermodal Transportation Facilities (ITF) providing airport parking and pick-up and drop-off areas outside the CTA for private vehicles and commercial shuttles. One of the ITF APM stations would also serve the multi-modal/transit facility at 96th Street/Aviation Boulevard planned by Metro as a separate and independent project to provide the opportunity for passengers to access the Metro regional rail system.

In accordance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA), as Lead Agency, has completed an EIR to address and disclose the potential environmental impacts associated with the LAX Landside Access Modernization Program. The California Department of Transportation (Caltrans) and South Coast Air Quality Management District are Responsible Agencies pursuant to CEQA.

LAWA circulated a Draft EIR regarding the proposed Project, received public and agency comments on the Draft EIR, and prepared written responses to those comments – all of which provides the basis for this Final EIR.

Pursuant to CEQA Guidelines § 15132, a Final EIR consists of:

(a) The Draft EIR or a revision of the draft.

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

Accordingly, the Final EIR for the LAX Landside Access Modernization Program consists of two components, as follows:

**Component 1: Draft EIR and Technical Appendices**

Ten volumes were prepared for the Draft EIR, including technical appendices. These volumes were distributed for public review and comment from September 15, 2016 to November 15, 2016.

Volume 1 – Draft EIR: Volume 1 of the Final EIR includes the Draft EIR-Main Document, Chapters 1 through 3 and Sections 4.1 through 4.2 of Chapter 4.

Volume 2 – Draft EIR: Volume 2 of the Final EIR includes the Draft EIR-Main Document, Sections 4.3 through 4.11 of Chapter 4.

Volume 3 – Draft EIR: Volume 3 of the Final EIR includes the Draft EIR-Main Document, Sections 4.12 through 4.13 of Chapter 4 and Chapters 5 through 8.

Volume 4 – Draft EIR Technical Appendices: Volume 4 of the Final EIR includes Appendix A and technical Appendices B and C. Appendix A compiles input received associated with the Notice of Preparation (NOP) that was distributed for public review and comment from February 5, 2015 through March 9, 2015, including: Initial Study, Notice of Preparation (NOP), NOP Comments, Scoping Meeting Materials, and Scoping Meeting Comments. Appendix B contains the LAX Design Guidelines; Appendix C contains a redline version of the LAX Plan Revisions.

Volume 5 – Draft EIR Technical Appendices: Volume 5 of the Final EIR includes technical Appendices D through F. Appendix D consists of the redline version of the LAX Specific Plan Revisions. Appendix E consists of existing conditions photographs around LAX. Appendix F contains the supporting data and analyses that were developed in conjunction with the Draft EIR for Air Quality, Greenhouse Gases, and the Human Health Risk Assessment.

Volume 6 – Draft EIR Technical Appendices: Volume 6 of the Final EIR includes technical Appendices G and H. These appendices contain the tree surveys and historic resources technical report, respectively.

Volume 7 – Draft EIR Technical Appendices: Volume 7 of the Final EIR includes technical Appendices I and J and part 1 of Appendix K. These appendices contain the archaeological and paleontological resources assessment report, LAX Preservation Plan, and the hazardous materials assessment, respectively.

Volume 8 – Draft EIR Technical Appendices: Volume 8 of the Final EIR includes part 2 of Appendix K and Appendices L and M. These appendices contain the hazardous materials assessment, the hydrology and water quality technical report, and the supporting data and analysis developed in conjunction with the noise and vibration analysis, respectively.

Volume 9 – Draft EIR Technical Appendices: Volume 9 of the Final EIR includes Appendix N and part 1 of Appendix O. Appendix N contains the supporting data for the On-Airport Traffic study; Appendix O contains the Off-Airport Traffic study.

Volume 10 – Draft EIR Technical Appendices: Volume 10 of the Final EIR includes part 2 of Appendix O and Appendices P and Q. Appendix O contains the Off-Airport Traffic study. Appendices P and Q contain the supporting data for the construction traffic analysis and the water supply assessment, respectively.

**Component 2: Responses to Comments and Corrections and Additions to the Draft EIR**

Volume 11 – Responses to Comments and Corrections and Additions to the Draft EIR: The second part of the Final EIR consists of a compilation of the comments received on the Draft EIR, the written responses prepared by LAWA to those comments, and corrections and additions to the Draft EIR. This document includes indices (i.e., lists) of agencies, organizations, and individuals that commented on the Draft EIR.

Volume 12 - Attachments 1 and 2: This document provides a copy of the comment letters in their original form (i.e., photocopies of comment letters), as well as corrected attachments to the air quality appendices based on the corrections and additions to the Draft EIR.

All of the documents described above, comprising the Final EIR for the LAX Landside Access Modernization Program, are available for public review at:

- LAWA Administration Offices, One World Way, Suite 218, Los Angeles, CA 90045
- Westchester-Loyola Villa Branch Library, 7114 West Manchester Avenue, Los Angeles, CA 90045
- El Segundo Library, 111 West Mariposa Avenue, El Segundo, CA 90245
- Inglewood Library, 101 West Manchester Boulevard, Inglewood, CA 90301
- Culver City Library, 4975 Overland Avenue, Culver City, CA 90230
- Hawthorne Library, 12700 Grevillea Avenue, Hawthorne, CA 90250
- Dr. Mary McLeod Bethune Regional Branch Library, 3900 S. Western Avenue, Los Angeles, CA 90062

The Final EIR is also available online at www.ourlax.org and www.connectinglax.com.

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# 1. Introduction and Indices

## 1.1 Introduction

In compliance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA) has completed this Final Environmental Impact Report (Final EIR) for the Los Angeles International Airport (LAX or Airport) Landside Access Modernization Program. As described in the preface of this document, the Final EIR for the proposed Project consists of two components, with the first component consisting of Volumes 1 through 10 – Draft EIR and associated Technical Appendices, and the second component being Volume 11 – Responses to Comments and Corrections and Additions to the Draft EIR and Volume 12 – Attachments 1 and 2. These documents, Volumes 11 and 12, constitute the second component of the Final EIR.

### 1.1.1 DRAFT EIR

A detailed description of the proposed Project is provided in Volume 1 of the EIR (see Chapter 2 in the Draft EIR-Main Document). On September 15, 2016, LAWA published a Draft EIR for the LAX Landside Access Modernization Program. In accordance with CEQA, the Draft EIR was circulated for public review for 45 days, with the review period scheduled to close on October 31, 2016. During the public review period, LAWA received multiple requests for an extension of the comment period. LAWA extended the comment period by an additional 15 days, with the review period closing on November 15, 2016. Two public workshops were held during the comment period: one on October 15, 2016 and one on October 19, 2016.

As explained in more detail in Volume 1 of the EIR, the LAX Landside Access Modernization Program includes:

- An APM system with six APM stations connecting the CTA via an above-grade fixed guideway to new proposed ground transportation facilities;
  - Passenger walkway systems with moving walkways connecting the APM stations to passenger terminals, parking garages, and ground transportation facilities;
  - Modifications to existing passenger terminals and parking garages to support the APM walkway system connections, including vertical circulation (elevators, escalators, and stairs) cores to garage levels and to the arrival, departure, and concourse levels at the terminals;
  - An APM maintenance and storage facility (MSF);
  - APM power substations;

- A CONRAC designed to meet the needs of rental car agencies serving LAX with access to the CTA via the APM;
- Two ITFs providing airport parking and pick-up and drop-off areas outside the CTA for private vehicles and commercial shuttles;
- Roadway improvements designed to improve access to the proposed facilities and the CTA and reduce traffic congestion in neighboring communities;
- Security features, including security fencing, surveillance cameras, security lighting, and emergency phones/call boxes, to reduce demands on the Los Angeles World Airports Police Department (LAWAPD);
- Fire safety features in compliance with fire and building code requirements including fire hydrants, fire sprinklers, and fire extinguishers;
- Utilities infrastructure, both new and modified to support the proposed Project;
- Incorporation of the LAX Design Guidelines into the proposed Project;
- Land acquisition, subdivision of parcels, creation of new tract maps, and/or other reconfiguration of parcels, dedications and vacations of public rights-of-way, as well as zoning change approvals;
- Future potential related development on land owned by LAWA located adjacent to the new proposed ground transportation facilities;
- Enabling projects to allow construction of the proposed Project, including utility relocation and demolition of certain existing facilities, some of which would be reconstructed; and
- Amendments to plans regulating land use in the area, including the City of Los Angeles General Plan and the LAX Specific Plan, zone changes, and the reconfiguration of existing parcels.

The LAX Landside Access Modernization Program would support the ongoing modernization of LAX by improving the landside transportation system serving the Airport and improving the passenger and visitor experience. The underlying purposes of the proposed Project are to improve access to LAX and relieve congestion on Airport and surrounding roadways.

### 1.1.2 FINAL EIR

In accordance with State CEQA Guidelines § 15088, LAWA prepared responses to all comments received on the Draft EIR. As required by the State CEQA Guidelines, the focus of the responses to comments is on "the disposition of significant environmental issues raised." State CEQA Guidelines § 15088(c). Detailed responses are not provided to comments on the merits of the LAX Landside Access Modernization Program or on other topics that do not relate to environmental issues. As discussed below, all comments received on the Draft EIR will be forwarded, as part of this Final EIR, to the decision-makers for their consideration prior to taking any action on the LAX Landside Access Modernization Program.

This document, which is the second component of the Final EIR, presents the comments received during the public review period for the Draft EIR and provides written responses to those comments. A total of 75 comment letters were received during the public review period; 3 were written comments submitted at the public workshops on either October 15, 2016 or October 19, 2016. The indices presented at the end of this chapter list the agencies, organizations, and individuals that submitted comments on the Draft EIR. Copies of all comment letters received are included in Appendix A of this document. Chapter 2 of this document presents, on a letter-by-letter basis, each comment which is then followed immediately by a response for all comments received during the review period for the Draft EIR (September 15, 2016 through November 15, 2016). Notwithstanding that the comment period closed on November 15, 2016, LAWA received several comments through December 2016 and has included responses to those comments as well. The comments and responses are organized and grouped together into categories based on the affiliation of the commentor. The comments are presented in the following order: federal agencies, state agencies, regional agencies, local agencies, and public comments (i.e., letters from private citizens, organizations, etc.). Chapter 3 of this document provides corrections and additions to information presented in the Draft EIR.

Together with the Draft EIR, the responses to comments, along with corrections and additions to the Draft EIR, and list of commentors, constitute the Final EIR. Pursuant to CEQA, the Final EIR is not circulated for another round of comments and responses. The Final EIR will be presented to the decision-makers for their use in considering the LAX Landside Access Modernization Program. Interested persons may comment on the Final EIR, including these responses, in the course of the decision-making process related to the Project; however, LAWA is not required to provide responses to such comments.

## 1.2 Indices of Comment Letters

An alphanumeric index system is used to identify each comment and response, and is keyed to each letter and the individual comments therein. For example, the only letter within the group of federal agencies submitting comments on the Draft EIR is from the U.S. Department of Homeland Security, Federal Emergency Management Agency, and the text of the letter is considered to have 1 individual comment. The subject letter was assigned the alphanumeric label "LAMP-AF00001," representing "LAX Landside Access Modernization Program-Agency-Federal-Letter No. 1." The individual comment within the letter is labeled as "LAMP-AF00001-1." The same basic format and approach is used for the comment letters from state agencies ("AS"), regional agencies ("AR"), local agencies ("AL"), and public comments ("PC").

The following are the prefix codes used for categorizing the comment letter types:

| LETTER ID PREFIX | DESCRIPTION |
|---|---|
| AF | Federal Agency |
| AS | State Agency |
| AR | Regional Agency |
| AL | Local Agency |
| PC | Public Comment |

To assist the reader's review and use of the responses to comments, three indices are provided. These indices provide the alphanumeric label number, commentor name, affiliation (i.e., name of agency or organization that the author represents), and date (if provided) of each comment letter. The first index lists all the comment letters by alphanumeric label number, the second index lists all of the comment letters by the commentor's last name, and the third index lists all of the comment letters by the affiliation if any, of the commentor.

Chapter 2 provides individual comments and responses, presented on a letter-by-letter basis. Each comment is typed exactly as it appears in the original comment letter. No corrections to typographical errors or other edits to the original comments were made. A copy of each original comment letter is provided in Attachment 1 of Volume 12 of this Final EIR.

Immediately following each typed comment is a written response. In many instances, the response to a particular comment may refer to the response(s) to another comment(s) that expressed the same concern or is otherwise related. Cross-referencing of responses uses the alphanumeric index system as described above. For example, a response may indicate "Please see Response to Comment LAMP-AL00001-2" if that response addresses the same concern expressed in a different comment.

Following are the three indices that organize comment letters by letter indication number, commentor and affiliation.

**Table 1-1: Index by Letter Identification (ID) Number**

| LETTER ID | COMMENTOR | AFFILIATION/AGENCY | DATE |
|---|---|---|---|
| LAMP-AF00001 | Blackburn, Gregor | U.S. Department of Homeland Security, FEMA Region IX | 10/05/2016 |
| LAMP-AS00001 | Morgan, Scott | State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit | 11/01/2016 |
| LAMP-AS00002 | Watson, DiAnna | California Department of Transportation | 11/15/2016 |
| LAMP-AR00001 | Wong, Ph.D., Jillian | South Coast Air Quality Management District | 10/28/2016 |
| LAMP-AL00001 | Poosti, Ali | City of Los Angeles, Bureau of Sanitation | 10/24/2016 |
| LAMP-AL00002 | Pullen-Miles, Robert | City of Lawndale | 10/27/2016 |
| LAMP-AL00003 | Durbin, Bruce | County of Los Angeles, Airport Land Use Commission | 11/1/2016 |
| LAMP-AL00004 | Hall, Thomas L. | LA Community College District | 11/15/2016 |
| LAMP-AL00005 | Saucedo, Silvia | LA Community College District | 11/15/2016 |
| LAMP-AL00006 | Lichman, Ph.D., Barbara | Buchalter Nemer, A. Professional Law Corporation (City of Culver City) | 11/15/2016 |
| LAMP-AL00007 | Carvajal, Elizabeth | Los Angeles County Metropolitan Transportation Authority | 11/15/2016 |
| LAMP-AL00008 | Wolff, Osa L. | Shute, Mihaly & Weinberger LLP (City of El Segundo) | 11/15/2016 |
| LAMP-AL00009 | Holloway, Charles C. | Los Angeles Department of Water & Power | 11/15/2016 |
| LAMP-AL00010 | Atwell, Louis A. | City of Inglewood | 11/15/2016 |
| LAMP-AL00011 | Bonin, Mike | City of Los Angeles, 11th District | 11/15/2016 |

| LETTER ID | COMMENTOR | AFFILIATION/AGENCY | DATE |
|---|---|---|---|
| LAMP-AL00012 | Impett, Laurel L. | Shute, Mihaly & Weinberger LLP (City of El Segundo) | 12/02/2016 |
| LAMP-PC00001 | Mayhew, Chuck | American Airlines | 9/15/2016 |
| LAMP-PC00002 | Minosyan, Andrey | Independent Taxi Co. | 9/16/2016 |
| LAMP-PC00003 | Sievering, Eric | | 9/17/2016 |
| LAMP-PC00004 | Donahue, Ed | | 9/16/2016 |
| LAMP-PC00005 | Russell, Stephen | | 9/18/2016 |
| LAMP-PC00006 | Russell, Stephen | | 9/17/2016 |
| LAMP-PC00007 | Russell, Stephen | | 9/17/2016 |
| LAMP-PC00008 | Russell, Stephen | | 9/17/2016 |
| LAMP-PC00009 | Russell, Stephen | | 9/18/2016 |
| LAMP-PC00010 | Frank, Alec | | 9/19/2016 |
| LAMP-PC00011 | Reid, Cody | Park 'N Fly | 9/19/2016 |
| LAMP-PC00012 | Birch, Stephen | Flying Crown Land Group | 9/19/2016 |
| LAMP-PC00013 | Osztreicher, Daniel | | 9/20/2016 |
| LAMP-PC00014 | Hughes, Laurie | Gateway to L.A. PBID | 9/23/2016 |
| LAMP-PC00015 | Dorn, Heidi | | 9/26/2016 |
| LAMP-PC00016 | Sevilla, Virgil | | 10/11/2016 |
| LAMP-PC00017 | Ogawa, Ed | | 10/15/2016 |
| LAMP-PC00018 | Robinson, Precious | | 10/15/2016 |
| LAMP-PC00019 | Hammer, Rod | | 10/19/2016 |
| LAMP-PC00020 | Shrier, Kevin | TPS Parking Management, LLC | 10/04/2016 |
| LAMP-PC00021 | Hench, Cyndi | Neighborhood Council of Westchester Playa | 10/04/2016 |
| LAMP-PC00022 | Sevilla, Virgil | | 10/28/2016 |
| LAMP-PC00023 | Mastroly, Frank | | 10/31/2016 |
| LAMP-PC00024 | Kolla, Peter | Four Points by Sheraton, Los Angeles International Airport | 11/11/2016 |
| LAMP-PC00025 | Hart, Jeff | Los Angeles Airport Marriott | 11/14/2016 |
| LAMP-PC00026 | Rostek, Jeff | Hyatt Regency Los Angeles International Airport | 11/08/2016 |
| LAMP-PC00027 | Tong, Maria | | 11/14/2016 |
| LAMP-PC00028 | Shrier, Kevin | TPS Parking Management, LLC | 11/15/2016 |
| LAMP-PC00029 | Given, John P. | Law Office of John P. Given (Paul Solomon) | 11/15/2016 |
| LAMP-PC00030 | Hughes, Laurie | Gateway to L.A. PBID | 11/15/2016 |
| LAMP-PC00031 | Cumming, William | Los Angeles International Airport Area Advisory Committee | 11/14/2016 |
| LAMP-PC00032 | Schneider, Denny | Alliance for a Regional Solution to Airport Congestion | 11/15/2016 |
| LAMP-PC00033 | Tamaki, Kevin | Valley Industry & Commerce Association | 10/04/2016 |
| LAMP-PC00034 | Cully, Mark | | 11/05/2016 |
| LAMP-PC00035 | Kooklanfar, Peymon | | 11/07/2016 |

| LETTER ID | COMMENTOR | AFFILIATION/AGENCY | DATE |
|---|---|---|---|
| LAMP-PC00036 | Mass, Andrew | | 10/31/2016 |
| LAMP-PC00037 | Long, Domenica Rose | | 10/31/2016 |
| LAMP-PC00038 | Rojas, Hugo | | 10/31/2016 |
| LAMP-PC00039 | Diewock, Liz | | 10/31/2016 |
| LAMP-PC00040 | Williamsen, Ralph | | 10/31/2016 |
| LAMP-PC00041 | Hammett, Lovely | | 10/31/2016 |
| LAMP-PC00042 | Sauschuck, Richard | | 10/31/2016 |
| LAMP-PC00043 | Plukas, Andrew | | 11/01/2016 |
| LAMP-PC00044 | Klein, Ellen | | 11/01/2016 |
| LAMP-PC00045 | Reno, M Debra | | 11/01/2016 |
| LAMP-PC00046 | Mendola, Ildiko | | 11/02/2016 |
| LAMP-PC00047 | Bergna, Louis | | 11/02/2016 |
| LAMP-PC00048 | Charette, Ed | | 11/03/2016 |
| LAMP-PC00049 | Morrison, Michael | | 11/03/2016 |
| LAMP-PC00050 | Pastores, Gabriela | | 11/04/2016 |
| LAMP-PC00051 | Scott, Mel | | 11/05/2016 |
| LAMP-PC00052 | Brunelle, Belinda | | 11/07/2016 |
| LAMP-PC00053 | Gibbs, Paul | Crowne Plaza Los Angeles Int'l Airport | 11/15/2016 |
| LAMP-PC00054 | Bassett, Charles A. | L&R Group of Companies | 11/15/2016 |
| LAMP-PC00055 | Milliron, Hayden | | 11/29/2016 |
| LAMP-PC00056 | Capo, Helen | | 11/14/2016 |
| LAMP-PC00057 | Guzman, Debra | | 11/18/2016 |
| LAMP-PC00058 | Paquin, Wendy | City of Inglewood | 11/12/2016 |
| LAMP-PC00059 | Moore, William | City of Los Angeles, 11th District | 11/15/2016 |

**Table 1-2: Index by Commentor**

| COMMENTOR | AFFILIATION/AGENCY | DATE | LETTER ID |
|---|---|---|---|
| Atwell, Louis A. | City of Inglewood | 11/15/2016 | LAMP-AL00010 |
| Bassett, Charles A. | L&R Group of Companies | 11/15/2016 | LAMP-PC00054 |
| Bergna, Louis | | 11/2/2016 | LAMP-PC00047 |
| Birch, Stephen | Flying Crown Land Group | 9/19/2016 | LAMP-PC00012 |
| Blackburn, Gregor | U.S. Department of Homeland Security, FEMA Region IX | 10/05/2016 | LAMP-AF00001 |
| Bonin, Mike | City of Los Angeles, 11th District | 11/15/2016 | LAMP-AL00011 |
| Brunelle, Belinda | | 11/07/2016 | LAMP-PC00052 |

| COMMENTOR | AFFILIATION/AGENCY | DATE | LETTER ID |
|---|---|---|---|
| Capo, Helen | | 11/14/2016 | LAMP-PC00056 |
| Carvajal, Elizabeth | Los Angeles County Metropolitan Transportation Authority | 11/15/2016 | LAMP-AL00007 |
| Charette, Ed | | 11/03/2016 | LAMP-PC00048 |
| Cully, Mark | | 11/05/2016 | LAMP-PC00034 |
| Cumming, William | Los Angeles International Airport Area Advisory Committee | 11/14/2016 | LAMP-PC00031 |
| Diewock, Liz | | 10/31/2016 | LAMP-PC00039 |
| Donahue, Ed | | 9/16/2016 | LAMP-PC00004 |
| Dorn, Heidi | | 9/26/2016 | LAMP-PC00015 |
| Durbin, Bruce | County of Los Angeles, Airport Land Use Commission | 11/01/2016 | LAMP-AL00003 |
| Frank, Alec | | 9/19/2016 | LAMP-PC00010 |
| Gibbs, Paul | Crowne Plaza Los Angeles Int'l Airport | 11/15/2016 | LAMP-PC00053 |
| Given, John P. | Law Office of John P. Given (Paul Solomon) | 11/15/2016 | LAMP-PC00029 |
| Guzman, Debra | | 11/18/2016 | LAMP-PC00057 |
| Hall, Thomas L. | LA Community College District | 11/15/2016 | LAMP-AL00004 |
| Hammer, Rod | | 10/19/2016 | LAMP-PC00019 |
| Hammett, Lovely | | 10/31/2016 | LAMP-PC00041 |
| Hart, Jeff | Los Angeles Airport Marriott | 11/14/2016 | LAMP-PC00025 |
| Hench, Cyndi | Neighborhood Council of Westchester Playa | 10/04/2016 | LAMP-PC00021 |
| Holloway, Charles C. | Los Angeles Department of Water & Power | 11/15/2016 | LAMP-AL00009 |
| Hughes, Laurie | Gateway to L.A. PBID | 9/23/2016 | LAMP-PC00014 |
| Hughes, Laurie | Gateway to L.A. PBID | 11/15/2016 | LAMP-PC00030 |
| Impett, Laurel L. | Shute, Mihaly & Weinberger LLP (City of El Segundo) | 12/02/2016 | LAMP-AL00012 |
| Klein, Ellen | | 11/01/2016 | LAMP-PC00044 |
| Kolla, Peter | Four Points by Sheraton, Los Angeles International Airport | 11/11/2016 | LAMP-PC00024 |
| Kooklanfar, Peymon | | 11/07/2016 | LAMP-PC00035 |
| Lichman, Ph.D., Barbara | Buchalter Nemer, A. Professional Law Corporation (City of Culver City) | 11/15/2016 | LAMP-AL00006 |
| Long, Domenica Rose | | 10/31/2016 | LAMP-PC00037 |
| Mass, Andrew | | 10/31/2016 | LAMP-PC00036 |
| Mastroly, Frank | | 10/31/2016 | LAMP-PC00023 |
| Mayhew, Chuck | American Airlines | 9/15/2016 | LAMP-PC00001 |
| Mendola, Ildiko | | 11/02/2016 | LAMP-PC00046 |
| Milliron, Hayden | | 11/29/2016 | LAMP-PC00055 |
| Minosyan, Andrey | Independent Taxi Co. | 9/16/2016 | LAMP-PC00002 |
| Moore, William | City of Los Angeles, 11th District | 11/15/2016 | LAMP-PC00059 |
| Morgan, Scott | State of California, Governor's Office of Planning and Research, State | 11/01/2016 | LAMP-AS00001 |

| COMMENTOR | AFFILIATION/AGENCY | DATE | LETTER ID |
|---|---|---|---|
| | Clearinghouse and Planning Unit | | |
| Morrison, Michael | | 11/03/2016 | LAMP-PC00049 |
| Ogawa, Ed | | 10/15/2016 | LAMP-PC00017 |
| Osztreicher, Daniel | | 9/20/2016 | LAMP-PC00013 |
| Paquin, Wendy | City of Inglewood | 11/12/2016 | LAMP-PC00058 |
| Pastores, Gabriela | | 11/04/2016 | LAMP-PC00050 |
| Plukas, Andrew | | 11/01/2016 | LAMP-PC00043 |
| Poosti, Ali | City of Los Angeles, Bureau of Sanitation | 10/24/2016 | LAMP-AL00001 |
| Pullen-Miles, Robert | City of Lawndale | 10/27/2016 | LAMP-AL00002 |
| Reid, Cody | Park 'N Fly | 9/19/2016 | LAMP-PC00011 |
| Reno, M Debra | | 11/01/2016 | LAMP-PC00045 |
| Robinson, Precious | | 10/15/2016 | LAMP-PC00018 |
| Rojas, Hugo | | 10/31/2016 | LAMP-PC00038 |
| Rostek, Jeff | Hyatt Regency Los Angeles International Airport | 11/08/2016 | LAMP-PC00026 |
| Russell, Stephen | | 9/18/2016 | LAMP-PC00005 |
| Russell, Stephen | | 9/17/2016 | LAMP-PC00006 |
| Russell, Stephen | | 9/17/2016 | LAMP-PC00007 |
| Russell, Stephen | | 9/17/2016 | LAMP-PC00008 |
| Russell, Stephen | | 9/18/2016 | LAMP-PC00009 |
| Saucedo, Silvia | LA Community College District | 11/15/2016 | LAMP-AL00005 |
| Sauschuck, Richard | | 10/31/2016 | LAMP-PC00042 |
| Schneider, Denny | Alliance for a Regional Solution to Airport Congestion | 11/15/2016 | LAMP-PC00032 |
| Scott, Mel | | 11/05/2016 | LAMP-PC00051 |
| Sevilla, Virgil | | 10/11/2016 | LAMP-PC00016 |
| Sevilla, Virgil | | 10/28/2016 | LAMP-PC00022 |
| Shrier, Kevin | TPS Parking Management, LLC | 10/04/2016 | LAMP-PC00020 |
| Shrier, Kevin | TPS Parking Management, LLC | 11/15/2016 | LAMP-PC00028 |
| Sievering, Eric | | 9/17/2016 | LAMP-PC00003 |
| Tamaki, Kevin | Valley Industry & Commerce Association | 10/04/2016 | LAMP-PC00033 |
| Tong, Maria | | 11/14/2016 | LAMP-PC00027 |
| Watson, DiAnna | California Department of Transportation | 11/15/2016 | LAMP-AS00002 |
| Williamsen, Ralph | | 10/31/2016 | LAMP-PC00040 |
| Wolff, Osa L. | Shute, Mihaly & Weinberger LLP (City of El Segundo) | 11/15/2016 | LAMP-AL00008 |
| Wong, Ph.D., Jillian | South Coast Air Quality Management District | 10/28/2016 | LAMP-AR00001 |

**Table 1-3: Index by Affiliation**

| AFFILIATION/AGENCY | DATE | LETTER ID | COMMENTOR |
|---|---|---|---|
| Alliance for a Regional Solution to Airport Congestion | 11/15/2016 | LAMP-PC00032 | Schneider, Denny |
| American Airlines | 9/15/2016 | LAMP-PC00001 | Mayhew, Chuck |
| Buchalter Nemer, A. Professional Law Corporation (City of Culver City) | 11/15/2016 | LAMP-AL00006 | Lichman, Ph.D., Barbara |
| California Department of Transportation | 11/15/2016 | LAMP-AS00002 | Watson, DiAnna |
| City of Inglewood | 11/15/2016 | LAMP-AL00010 | Atwell, Louis A. |
| City of Inglewood | 11/12/2016 | LAMP-PC00058 | Paquin, Wendy |
| City of Lawndale | 10/27/2016 | LAMP-AL00002 | Pullen-Miles, Robert |
| City of Los Angeles, 11th District | 11/15/2016 | LAMP-AL00011 | Bonin, Mike |
| City of Los Angeles, 11th District | 11/15/2016 | LAMP-PC00059 | Moore, William |
| City of Los Angeles, Bureau of Sanitation | 10/24/2016 | LAMP-AL00001 | Poosti, Ali |
| County of Los Angeles, Airport Land Use Commission | 11/01/2016 | LAMP-AL00003 | Durbin, Bruce |
| Crowne Plaza Los Angeles Int'l Airport | 11/15/2016 | LAMP-PC00053 | Gibbs, Paul |
| Flying Crown Land Group | 9/19/2016 | LAMP-PC00012 | Birch, Stephen |
| Four Points by Sheraton, Los Angeles International Airport | 11/11/2016 | LAMP-PC00024 | Kolla, Peter |
| Gateway to L.A. PBID | 9/23/2016 | LAMP-PC00014 | Hughes, Laurie |
| Gateway to L.A. PBID | 11/15/2016 | LAMP-PC00030 | Hughes, Laurie |
| Hyatt Regency Los Angeles International Airport | 11/08/2016 | LAMP-PC00026 | Rostek, Jeff |
| Independent Taxi Co. | 9/16/2016 | LAMP-PC00002 | Minosyan, Andrey |
| Kooklanfar, Peymon | 11/07/2016 | LAMP-PC00035 | Kooklanfar, Peymon |
| L&R Group of Companies | 11/15/2016 | LAMP-PC00054 | Bassett, Charles A. |
| LA Community College District | 11/15/2016 | LAMP-AL00004 | Hall, Thomas L. |
| LA Community College District | 11/15/2016 | LAMP-AL00005 | Saucedo, Silvia |
| Law Office of John P. Given (Paul Solomon) | 11/15/2016 | LAMP-PC00029 | Given, John P. |
| Los Angeles Airport Marriott | 11/14/2016 | LAMP-PC00025 | Hart, Jeff |
| Los Angeles County Metropolitan Transportation Authority | 11/15/2016 | LAMP-AL00007 | Carvajal, Elizabeth |
| Los Angeles Department of Water & Power | 11/15/2016 | LAMP-AL00009 | Holloway, Charles C. |
| Los Angeles International Airport Area Advisory Committee | 11/14/2016 | LAMP-PC00031 | Cumming, William |
| Neighborhood Council of Westchester Playa | 10/04/2016 | LAMP-PC00021 | Hench, Cyndi |
| Park 'N Fly | 9/19/2016 | LAMP-PC00011 | Reid, Cody |
| Shute, Mihaly & Weinberger LLP (City of El Segundo) | 11/15/2016 | LAMP-AL00008 | Wolff, Osa L. |
| Shute, Mihaly & Weinberger LLP (City of El Segundo) | 12/02/2016 | LAMP-AL00012 | Impett, Laurel L. |
| South Coast Air Quality Management District | 10/28/2016 | LAMP-AR00001 | Wong, Ph.D., Jillian |
| State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit | 11/01/2016 | LAMP-AS00001 | Morgan, Scott |
| TPS Parking Management, LLC | 10/04/2016 | LAMP-PC00020 | Shrier, Kevin |
| TPS Parking Management, LLC | 11/15/2016 | LAMP-PC00028 | Shrier, Kevin |
| U.S. Department of Homeland Security, FEMA Region IX | 10/05/2016 | LAMP-AF00001 | Blackburn, Gregor |
| Valley Industry & Commerce Association | 10/04/2016 | LAMP-PC00033 | Tamaki, Kevin |
| | 11/02/2016 | LAMP-PC00047 | Bergna, Louis |
| | 11/07/2016 | LAMP-PC00052 | Brunelle, Belinda |
| | 11/14/2016 | LAMP-PC00056 | Capo, Helen |

| AFFILIATION/AGENCY | DATE | LETTER ID | COMMENTOR |
|---|---|---|---|
| | 11/03/2016 | LAMP-PC00048 | Charette, Ed |
| | 11/05/2016 | LAMP-PC00034 | Cully, Mark |
| | 10/31/2016 | LAMP-PC00039 | Diewock, Liz |
| | 9/16/2016 | LAMP-PC00004 | Donahue, Ed |
| | 9/26/2016 | LAMP-PC00015 | Dorn, Heidi |
| | 9/19/2016 | LAMP-PC00010 | Frank, Alec |
| | 11/18/2016 | LAMP-PC00057 | Guzman, Debra |
| | 10/19/2016 | LAMP-PC00019 | Hammer, Rod |
| | 10/31/2016 | LAMP-PC00041 | Hammett, Lovely |
| | 11/01/2016 | LAMP-PC00044 | Klein, Ellen |
| | 10/31/2016 | LAMP-PC00037 | Long, Domenica Rose |
| | 10/31/2016 | LAMP-PC00036 | Mass, Andrew |
| | 10/31/2016 | LAMP-PC00023 | Mastroly, Frank |
| | 11/02/2016 | LAMP-PC00046 | Mendola, Ildiko |
| | 11/29/2016 | LAMP-PC00055 | Milliron, Hayden |
| | 11/03/2016 | LAMP-PC00049 | Morrison, Michael |
| | 10/15/2016 | LAMP-PC00017 | Ogawa, Ed |
| | 9/20/2016 | LAMP-PC00013 | Osztreicher, Daniel |
| | 11/4/2016 | LAMP-PC00050 | Pastores, Gabriela |
| | 11/01/2016 | LAMP-PC00043 | Plukas, Andrew |
| | 11/01/2016 | LAMP-PC00045 | Reno, M Debra |
| | 10/15/2016 | LAMP-PC00018 | Robinson, Precious |
| | 10/31/2016 | LAMP-PC00038 | Rojas, Hugo |
| | 9/18/2016 | LAMP-PC00005 | Russell, Stephen |
| | 9/17/2016 | LAMP-PC00006 | Russell, Stephen |
| | 9/17/2016 | LAMP-PC00007 | Russell, Stephen |
| | 9/17/2016 | LAMP-PC00008 | Russell, Stephen |
| | 9/18/2016 | LAMP-PC00009 | Russell, Stephen |
| | 10/31/2016 | LAMP-PC00042 | Sauschuck, Richard |
| | 11/05/2016 | LAMP-PC00051 | Scott, Mel |
| | 10/11/2016 | LAMP-PC00016 | Sevilla, Virgil |
| | 10/28/2016 | LAMP-PC00022 | Sevilla, Virgil |
| | 9/17/2016 | LAMP-PC00003 | Sievering, Eric |
| | 11/14/2016 | LAMP-PC00027 | Tong, Maria |
| | 10/31/2016 | LAMP-PC00040 | Williamsen, Ralph |

# 2. Comments and Responses

**LAMP-AF00001 Blackburn, Gregor U.S. Department of Homeland Security, FEMA Region IX 10/5/2016**

**LAMP-AF00001-1**

**Comment:** This is in response to your request for comments regarding the Notice of Availability, City of Los Angeles, California – Los Angeles World Airports (LAWA) for the Draft Environmental Impact Report for LAX Landside Access Modernization Project (LAMP).

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Los Angeles (Community Number 065043), Maps revised January 6, 2016 and City of Los Angeles (Community Number 060137), Maps revised September 26, 2008. Please note that the City of Woodland, Yolo County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data

to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Los Angeles floodplain manager can be reached by calling Gary L. Moore, City Engineer, at (213) 485-4935. The Los Angeles County floodplain manager can be reached by calling George De La O, Senior Civil Engineer, at (626) 458-7155.

**Response:** As stated in the Initial Study (included in Appendix A of the Draft EIR), none of the project components associated with the LAX Landside Access Modernization Program are located within a floodplain, as mapped and identified under the National Flood Insurance Program of the Federal Emergency Management Agency.[1] Additional information regarding hydrology, water quality, and groundwater quality impacts as a result of alterations to drainage patterns associated with the proposed Project is provided in Section 4.7, Hydrology, Water Quality, and Groundwater, of the Draft EIR.

[1] Federal Emergency Management Agency, Flood Insurance Rate Map_Panel 1760_Map Number 06037C1760F, September 26, 2008; Federal Emergency Management Agency, Flood Insurance Rate Map_Panel 1780_Map Number 06037C1780F, September 26, 2008.

## LAMP-AS00001 Morgan, Scott State of California State Clearinghouse 11/1/2016

**LAMP-AS00001-1**

**Comment:** The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on October 31, 2016, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

**Response:** LAWA extended the close of the review period for the LAX Landside Access Modernization Program Draft EIR to November 15, 2016 to provide an additional 15 days for public comment beyond the requirements of CEQA (State CEQA Guidelines Section 15105). A comment letter from the State of California, Department of Transportation (Caltrans) was sent directly to LAWA and was received on November 15, 2016. Caltrans' comment letter is identified in the Final EIR as LAMP-AS00002.

## LAMP-AS00002 Watson, DiAnna California Department of Transportation 11/15/2016

**LAMP-AS00002-1**

**Comment:** Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Landside Access Modernization Program (LAMP) project. Caltrans would like to thank Los Angeles World Airports (LAWA) staff for the opportunity to collaborate and explore viable methods and alternatives to ensure that traffic relating to this project would be thoroughly evaluated.

**Response:** LAWA thanks Caltrans for its continued support and cooperation in assessing and evaluating potential traffic effects associated with the proposed LAX Landside Access Modernization Program and looks forward to continuing coordination on implementation of the proposed Project.

**LAMP-AS00002-2**

**Comment:** LAWA proposes to modernize the Los Angeles International Airport (LAX) to improve passenger quality-of-service and provide world class facilities for its customers. The LAMP project consists of redevelopment of the ground access system to the Airport, which would include a seamless connection to the regional rail and transit system.

Proposed improvements include 1) an Automated People Mover (APM) system with six APM stations connecting the Central Terminal Area (CTA) to new ground transportation facilities; 2) passenger walkway systems connecting the APM stations to passenger terminals or ground transportation facilities; 3) modifications to existing passenger terminals and parking garages within the CTA ; 4) intermodal transportation facilities (ITF) that would provide pick up and drop off areas outside the CTA for airport passengers and commercial shuttles, meet and greet areas, passenger processing facilities, retail, dining options and other amenities, parking, and access to the APM system; 5) Consolidated Rental Car Facility (CONRAC) that would be designed to consolidate car rental agencies in a centralized location with access to the CTA via the APM; 6) roadway improvements designed to improve access to the CTA from the freeway and provide access to the proposed ITFs and CONRAC; and 7) utilities needed to support the LAX Landside Access Modernization Program. The LAX Landside Access Modernization Program EIR will also analyze potential future related development after completion.

Proposed improvements would be constructed in an area generally bounded by Tom Bradley International Terminal (TBIT) in the CTA of LAX on the west, Interstate 105 on the south, Interstate 405 on the east, and Westchester Parkway/West Arbor Vitae Street on the north.

**Response:** The commentor is correct in its summary description of the LAX Landside Access Modernization Program components. A full description of the proposed Project elements can be found in Chapter 2, Description of the Proposed Project, of the Draft EIR.

**LAMP-AS00002-3**

**Comment:** Caltrans staff met with LAWA, the City of Los Angeles, and Metro on numerous occasions to identify and discuss the study area. Early coordination meetings provided several opportunities to collectively identify the potential impacts this project may have on the State Highway System and develop mitigation measures to minimize those effects.

LAWA worked with Caltrans to develop the following significant impact criteria for freeway segments and ramp junctions. It was determined that a project would have a significant impact if any of following conditions are met for either AM or PM peak hours.

- If vehicle queues exceed the length of an on-ramp or off-ramp where there is no auxiliary lane.
- When auxiliary lane is present, there is a significant impact when the queue exceeds the lesser of one-half the length of the auxiliary land or 1000 feet, which creates a speed differential between the auxiliary land and the adjacent lane.
- If freeway ramp terminal or ramp foremost or associated queue storage is blocked due to queuing or spillover at a surface street driveway or at an intersection
- If any intersection or driveway of the State Highway System (SHS) is in such proximity to another LAMP's intersection or driveway that safety concerns may arise.
- If the LAMP traffic conditions cause the Level of Service (LOS) to deteriorate to below LOS F. If a freeway segment is already at LOS F, then an increase in the demand/capacity ratio of greater than 1% determined by comparing the future with Project Conditions to the future without Project Conditions would result in a significant impact.

In this case, the existing freeway mainline traffic volumes were obtained from five weeks of traffic data from October 2014 provided and verified by Caltrans. Caltrans provided 24-hour traffic counts along the 1-105 Freeway, I-405 Freeway and SR-90 Freeway. The morning (6:00 AM to 9:00 AM) and evening (3:00 PM-7:00 PM) peak period traffic volumes by direction were selected for each analyzed freeway segment based on the five weeks of data from Tuesday through Thursday. Traffic Volumes reflect typical weekday operations during existing year conditions.

Per Caltrans request and analyses was done for the freeway mainline segments, freeway HOV segments, on- and off-ramp junctions and arterial intersection operations. In regards to the regional freeway system, an analysis was conducted to quantify potential impacts of the Project based on the significant traffic impact criteria developed with Caltrans. The analysis was conducted for 23 freeway mainline segments during the morning and evening peak hours.

**Response:** It is noted that the commentor agrees with the scope, assumptions, existing data and methodology for analysis and assessment of impacts on the State Highway System that are presented in Section 4.12.2, Off-Airport Transportation, and Appendix O, Off-Airport Traffic Study, of the Draft EIR.

**LAMP-AS00002-4**

**Comment:**

- Under Future (2035) with Project conditions, before mitigation, the Project is estimated to result in significant impact at 3 study intersections in the morning peak hour at various intersections including
- Sepulveda Boulevard & Century Boulevard - Impacted AM Peak Hour
- 1-105 Freeway Ramps (east of Aviation Boulevard) & Imperial Highway - Impacted PM Peak Hour

With the proposed improvements, impacts at these location are considered satisfactorily addressed.

**Response:** It is noted that the commentor agrees with the results of the impacts analysis for the Future (2035) with Project scenario relative to intersection impacts presented in Section 4.12.2, Off-Airport Transportation, and Appendix O, Off-Airport Traffic Study, of the Draft EIR. As clarification, the commentor is correct that under the Future (2035) with Project scenario three study area intersections (Sepulveda Boulevard and Century Boulevard, La Cienega Boulevard and Arbor Vitae Street, and La Cienega Boulevard and Century Boulevard) would be significantly impacted during the a.m. peak hour and that the intersection of I-105 Freeway Ramps (east of Aviation Boulevard) and Imperial Highway would not be significantly impacted during the a.m. peak hour but would be significantly impacted during the p.m. peak hour, as shown in Table 4.12.2-20 and discussed on page 4.12-123 of the Draft EIR. As shown in Table 4.12.2-38 on page 4.12-188 of the Draft EIR, impacts at all intersections would be mitigated to less than significant levels, except for the intersection of La Cienega Boulevard and Arbor Vitae Street, which would experience significant and unavoidable impacts.

**LAMP-AS00002-5**

**Comment:**
- Under future (2035) with Project (LAMP Build out) and other related project conditions the following intersections will be significantly impacted.
- Sepulveda Boulevard & Westchester Parkway - Impacted AM Peak Hour
- Sepulveda Boulevard & Century Boulevard - Impacted AM Peak Hour
- I-105 Freeway Ramps (east of Aviation Boulevard) & Imperial Highway - Impacted PM Peak Hour
- 1-405 Freeway Northbound Ramps & Century Boulevard - Impacted AM Peak Hour

**Response:** It is noted that the commentor agrees with the results of the impacts analysis for the Future (2035) with Project and Potential Future Related Development scenario relative to intersection impacts presented in Section 4.12.2, Off-Airport Transportation, and Appendix O, Off-Airport Traffic Study, of the Draft EIR. As clarification, the commentor is correct that under the Future (2035) with Project and Potential Future Related Development scenario, the intersection of Sepulveda Boulevard and Century Boulevard would be significantly impacted during the a.m. peak hour and, as shown in Table 4.12.2-31 and discussed on page 4.12-162 of the Draft EIR, this intersection would also be significantly impacted during the mid-day peak hour. As additional clarification, a total of eleven intersections would be significantly impacted during the a.m., p.m., and/or mid-day peak hour before mitigation, as shown in Table 4.12.2-31 and discussed on pages 4.12-161 and 4.12-162 of the Draft EIR.

**LAMP-AS00002-6**

**Comment:**
- Under Baseline (2015) with Project conditions and Future (2024) with Phase 1 Project conditions, the proposed Project would not result in significant impacts at the 23 freeway mainline segments during the morning and/or evening peak hours.

**Response:** It is noted that the commentor agrees with the results of the impacts analysis for the Baseline (2015) with Project and Future (2024) with Phase 1 Project scenarios relative to freeway segment impacts presented in Section 4.12.2, Off-Airport Transportation, and Appendix O, Off-Airport Traffic Study, of the Draft EIR.

**LAMP-AS00002-7**

**Comment:** - Under Future (2035) with Project conditions, one of the freeway mainline is expected to result in significant impacts, I-405 Freeway at La Cienega Boulevard, during the evening peak hour.

**Response:** It is noted that the commentor agrees with the results of the impacts analysis for the Future (2035) with Project scenario relative to freeway segment impacts presented in Section 4.12.2, Off-Airport Transportation, and Appendix O, Off-Airport Traffic Study, of the Draft EIR.

**LAMP-AS00002-8**

**Comment:** - Under Future (2035) with Project and Potential Future Related Development conditions, The proposed Project and Potential Future Related Development is expected to result in significant impacts at three freeway mainline segments during the evening peak hour and includes:

- I-405 Freeway at La Tijera Boulevard
- I-405 Freeway at La Cienega Boulevard
- I-105 Freeway west of Crenshaw Boulevard

**Response:** It is noted that the commentor agrees with the results of the impacts analysis without mitigation for the Future (2035) with Project and Potential Future Related Development scenario relative to freeway segment impacts presented in Section 4.12.2, Off-Airport Transportation, and Appendix O, Off-Airport Traffic Study, of the Draft EIR.

**LAMP-AS00002-9**

**Comment:** We acknowledge the traffic analysis identifies various segments along I-105 and I-405 that operate deficiently under conditions. The proposed Project will fund a fair-share contribution to the improvements show below to address the significant freeway impacts:

- I-405 Freeway Mobility Improvements
- I-405 Freeway Intelligent Transportation System (ITS) Improvements (including Active Traffic Management Strategies - ATMS)
- 1-105 Freeway Intelligent Transportation System (ITS) Improvements (including Active Traffic Management Strategies - ATMS)

The intent of (ITS) implementation is to alleviate the significant impacts of the Project along various key travel corridors within the City of Inglewood. It was recommended that the Project pays for the provision of new equipment need to carry out this mitigation. Furthermore, signal system corridor improvement will also be implemented. This consist of placing Closed Circuit TV (CCTV) cameras at key intersections. These will help LADOT to monitor traffic conditions in real-time to quickly address incidents that cause delay.

Provision of fair-share contribution to these cumulative impacts are considered as mitigation, per Caltrans' guidelines. Residual and unavoidable significant impacts at the above three freeway segments remain.

**Response:** It is noted that the commentor agrees with the results of the traffic operational analysis of various Caltrans' highway system elements presented in Section 4.12.2, Off-Airport Transportation, and

Appendix O, Off-Airport Traffic Study, of the Draft EIR, as well as the proposed Project's mitigation measures and fair share contribution towards these various mitigation measures discussed in Section 4.12.2.9 of the Draft EIR. It should be noted that, as shown in Tables 4.12.2-39 and 4.12.2-41 and discussed on pages 4.12-186 and 4.12-189 of the Draft EIR, with implementation of mitigation proposed in Section 4.12.2.9 of the Draft EIR, impacts at two (not three) freeway segments would remain significant and unavoidable (I-405 at La Tijera Boulevard and I-405 at La Cienega Boulevard); with mitigation, the impact at I-105 West of Crenshaw Boulevard would be reduced to a level less than significant. However, as discussed on page 4.12-189 of the Draft EIR, because implementation of mitigation to the State highway system is within the responsibility and jurisdiction of a public agency other than LAWA (i.e., Caltrans), LAWA cannot require it to be implemented. Significant (cumulatively considerable) impacts to freeway segments may not be reduced to less than significant if Caltrans does not adopt effective mitigation measures or if mitigation is infeasible. In that case, the proposed Project's cumulatively considerable impacts on these freeway segments would remain significant and unavoidable.

**LAMP-AS00002-10**

**Comment:** - An analysis was conducted to quantify potential impacts of the Project on the ramp junctions and arterial intersections within Caltrans jurisdiction, it was determined that there would be no significant impact at any of the ramp junctions and arterial intersections under Existing, Future (2024) and Future (2035) with Project conditions.

**Response:** It is noted that the commentor agrees with the results of the impact analysis at all ramp junctions for the Project under Existing (2015), Future (2024) with Phase 1 Project, and Future (2035) with Project Scenarios presented in Section 4.12.2, Off-Airport Transportation, and Appendix O, Off-Airport Traffic Study, of the Draft EIR.

**LAMP-AS00002-11**

**Comment:** All mitigation discussed were developed and accepted in agreement with Caltrans staff. Caltrans also acknowledges the project applicant has agreed to pay its fair-share of any feasible improvements that may be implemented at the significantly impacted segments.

**Response:** It is noted that the commentor agrees with and accepts the proposed mitigation measures for the Project presented in the Section 4.12.2.9 of the Draft EIR. Please note that formal "agreement" to pay fair share of mitigation costs would occur after LAWA adopts CEQA findings and approves the proposed Project.

**LAMP-AS00002-12**

**Comment:** LAWA states it wants to encourage alternative travel modes and Caltrans supports this effort to provide alternative travel modes access such as bicycle lanes and pedestrian paths. LAWA is encouraged to provide more details on specific bicycle and pedestrian improvement, i.e. sidewalks, bike lanes, bike parking, way-finding, as these improvements provided important alternative travel modes access to the LAMP improvements.

**Response:** The LAX Landside Access Modernization Program proposes to modify the Bike Plan as included in the existing Mobility Plan 2035 (see Figure 2-55 of the Draft EIR). In addition, the proposed ITFs would be designed to incorporate bicycle and pedestrian facilities, including bicycle parking and changing/shower facilities (see page 2-147 of the Draft EIR). Pedestrian access adjacent to the ITFs is discussed on pages 2-89, 2-90 and 2-109 of the Draft EIR. Sidewalk specifications for proposed roadway improvements are shown in Table 2-8 of the Draft EIR. See also Responses

to Comments LAMP-PC00021-14, LAMP-PC00026-4, LAMP-PC00031-6, and LAMP-PC00030-12. More details on these features would be provided during the design process after project approvals are obtained.

**LAMP-AS00002-13**

**Comment:** Several of the proposed improvement and mitigation will occur on the State Highway System ( I-105, I-405 and Sepulveda Blvd). For those improvements, Caltrans project development procedures will need to be followed and completed for implementation.

**Response:** LAWA will continue to coordinate with Caltrans on components of the LAX Landside Access Modernization Program. All Caltrans development procedures would be followed during implementation.

**LAMP-AS00002-14**

**Comment:** In the spirit of mutual cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2016-00219ME.

**Response:** The availability of Caltrans' staff for continued coordination with LAWA planners and engineers on the components of the LAX Landside Access Modernization Program is appreciated.

## LAMP-AR00001 Wong, Jillian South Coast Air Quality Management District 10/28/2016

**LAMP-AR00001-1**

**Comment:** Review of the Draft Environmental Impact Report (DEIR) for the LAX Landside Access Modernization Project (LAMP)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Final EIR.

Based on a review of the DEIR's air quality analyses for the proposed LAX Landside Access Modernization Project (LAMP), the SCAQMD staff has the following comments:

**Response:** Please see Responses to Comments LAMP-AR00001-2 through LAMP-AR00001-7 below. LAWA has incorporated SCAQMD's comments into the Final EIR.

**LAMP-AR00001-2**

**Comment:** Overlapping Project Phase 1 Regional Operation and Phase 2 Construction Emissions

Based on the proposed phasing schedule, Phase 1 operation emissions will be generated starting between years 2023-2024. These emissions will overlap with emissions generated during the Project's Phase 2 construction planned to start in 2025 and end in 2035.[1] Therefore, SCAQMD staff recommends combining these overlapping emissions and comparing them with the SCAQMD's operational thresholds of significance in the Final EIR.

[1] For analysis purposes, the air quality and other related studies analyzed impacts through Year 2030.

**Response:** In response to the SCAQMD's comment requesting that the overlapping operational and construction emissions be estimated and compared to the appropriate thresholds, the tables presented below provide such information based on the following considerations:

- By 2024, when the LAX Landside Access Modernization Program Project becomes operational, the air quality analysis assumed that the Phase 2 roadways would be constructed by the end of 2027); therefore, the overlapping operational and construction emissions should be compared to CEQA construction emission thresholds since this overlap is temporary in duration.
- The LAX Landside Access Modernization Program Project construction emissions would end in 2027, per the schedule included in the Draft EIR, Appendix F, Attachment F.1 – Construction-Criteria Pollutant and Greenhouse Gas Emissions: Master Construction Schedule (beginning on page 55 of the Appendix F PDF file). The LAX Landside Access Modernization Program Project elements include Project #s 5 through 507 in this Master Construction Schedule table.[1]
- The peak daily LAX Landside Access Modernization Program Project incremental operational emissions are summarized for 2024 and 2035, and are less than or equal to zero for all criteria air pollutants (Draft EIR, Tables 4.2.1-10 and 4.2.1-11, pages 4.2-37 and 4.2-38, respectively).
- The peak daily emissions between 2024 and 2027 for both construction and operational activities are included in Tables 1 and 2 below for unmitigated and mitigated scenarios, respectively. These comparisons for the LAX Landside Access Modernization Program Project indicate that the combined emissions would be less than significant during the period of overlapping construction and operations.
- In response to SCAQMD's request, the construction and operational emissions that overlap in time were reviewed. The SCAQMD CEQA operational emission thresholds only differ from the SCAQMD CEQA construction thresholds for NOx and VOC. The operational thresholds for NOx and VOC are 55 lbs/day, each. Comparing the combined peak daily NOx and VOC emissions for the overlapping period from the tables below to the operational thresholds (55 lbs/day, each) indicates that NOx and VOC emission impacts would still be less than significant for the LAX Landside Access Modernization Program Project.

[1] The emissions associated with potential future related development, Project #'s 509 through 548 in the Master Construction Schedule, are not included in this comparison since the timing of construction of these elements is speculative at this time; construction emissions would be addressed with more detail and precision in future project-level CEQA documents.

**TABLE 1**

**UNMITIGATED LAMP PROJECT CONSTRUCTION AND OPERATIONAL EMISSIONS 2024-2027**

| | LAMP Unmitigated Project Peak Day Emissions, lbs/day | | | | | Construction | |
|---|---|---|---|---|---|---|---|
| **Pollutant** | **2024** | **2025** | **2026** | **2027** | **Peak Day** | **CEQA Thresholds** | **Significant?** |
| CO Construction[a] | 60 | 22 | 2 | 21 | | | |
| CO Operation[b] | -233 | -233 | -233 | -233 | | | |
| **CO Total** | **-173** | **-211** | **-231** | **-212** | **-173** | **550** | **NO** |
| VOC | | | | | | | |
| Construction[a] | 14 | 2 | 4 | 23 | | | |
| VOC Operation[b] | -1 | -1 | -1 | -1 | | | |
| **VOC Total** | **13** | **1** | **3** | **22** | **22** | **75** | **NO** |
| NOx Construction[a] | 51 | 26 | 3 | 22 | | | |
| NOx Operation[b] | 0 | 0 | 0 | 0 | | | |
| **NOx Total** | **51** | **26** | **3** | **22** | **51** | **100** | **NO** |
| SO2 Construction[a] | <1 | <1 | <1 | <1 | | | |
| SO2 Operation[b] | 0 | 0 | 0 | 0 | | | |
| **SO2 Total** | **<1** | **<1** | **<1** | **<1** | **<1** | **150** | **NO** |
| PM10 | | | | | | | |
| Construction[a] | 26 | 25 | 1 | 19 | | | |
| PM10 Operation[b] | -33 | -33 | -33 | -33 | | | |
| **PM10 Total** | **-7** | **-8** | **-32** | **-14** | **-7** | **150** | **NO** |
| PM2.5 | | | | | | | |
| Construction[a] | 6 | 7 | <1 | 5 | | | |
| PM2.5 Operation[b] | -9 | -9 | -9 | -9 | | | |
| **PM2.5 Total** | **-3** | **-2** | **-9** | **-4** | **-2** | **55** | **NO** |

Notes:

a. Construction emissions for LAX Landside Access Modernization Program Project Phase 2 roadways were derived from the Construction Emissions Inventory files developed for the LAX Landside Access Modernization Program Draft EIR (CDM Smith 2016).

b. The maximum operational emissions from 2024 or 2035 LAX Landside Access Modernization Program Project operational emission increments (Draft EIR, Tables 4.2.1-10 and 4.2.1-11 (pages 4.2-37 and 4.2-38, respectively) were included in this table.

**TABLE 2**

**MITIGATED LAMP PROJECT CONSTRUCTION AND OPERATIONAL EMISSIONS 2024-2027**

| | LAMP Mitigated Project Peak Day Emissions, lbs/day | | | | | Construction CEQA | |
|---|---|---|---|---|---|---|---|
| **Pollutant** | **2024** | **2025** | **2026** | **2027** | **Peak Day** | **Thresholds** | **Significant?** |
| CO Construction[a] | 53 | 18 | 2 | 17 | | | |
| CO Operation[b] | -233 | -233 | -233 | -233 | | | |
| **CO Total** | **-180** | **-215** | **-231** | **-216** | **-180** | **550** | **NO** |
| VOC Construction[a] | 13 | 2 | 4 | 22 | | | |
| VOC Operation[b] | -1 | -1 | -1 | -1 | | | |
| **VOC Total** | **12** | **1** | **3** | **21** | **21** | **75** | **NO** |
| NOx Construction[a] | 40 | 22 | 3 | 19 | | | |
| NOx Operation[b] | 0 | 0 | 0 | 0 | | | |
| **NOx Total** | **40** | **22** | **3** | **19** | **40** | **100** | **NO** |
| SO2 Construction[a] | <1 | <1 | <1 | <1 | | | |
| SO2 Operation[b] | 0 | 0 | 0 | 0 | | | |
| **SO2 Total** | **<1** | **<1** | **<1** | **<1** | **<1** | **150** | **NO** |
| PM10 Construction[a] | 20 | 18 | 1 | 14 | | | |
| PM10 Operation[b] | -33 | -33 | -33 | -33 | | | |
| **PM10 Total** | **-13** | **-15** | **-32** | **-19** | **-14** | **150** | **NO** |
| PM2.5 Construction[a] | 4 | 4 | <1 | 3 | | | |
| PM2.5 Operation[b] | -9 | -9 | -9 | -9 | | | |
| **PM2.5 Total** | **-5** | **-5** | **-9** | **-6** | **-5** | **55** | **NO** |

Notes:

a. Construction emissions for LAX Landside Access Modernization Program Project Phase 2 were derived from the Construction Emissions Inventory files developed for the LAX Landside Access Modernization Program Draft EIR (CDM Smith 2016).

b. The maximum operational emissions from 2024 or 2035 LAX Landside Access Modernization Program Project operational emission increments (Draft EIR, Tables 4.2.1-10 and 4.2.1-11 (pages 4.2-37 and 4.2-38, respectively) were included in this table.

### LAMP- AR00001-3

**Comment:** SCAQMD as a Responsible Agency

Since SCAQMD permits will be required, the Final EIR should identify the SCAQMD as a responsible agency.

**Response:** The South Coast Air Quality Management District (SCAQMD) has been identified as a responsible agency in the Preface of the Final EIR.

**LAMP- AR00001-4**

**Comment:** Based on the project description, gasoline fueling equipment is planned for use in the proposed Consolidated Rental Car Facility (CONRAC). The applicable air quality analyses and health risk assessment in the Final EIR should be revised to include fueling equipment emissions generated during operations in order to account for those project emissions and health impacts. For permit questions, please contact SCAQMD Engineering staff at (909) 396-2551.

**Response:** The analyses for the Final EIR have been updated to include emissions associated with the gasoline fueling equipment in the CONRAC. Please see Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP- AR00001-5**

**Comment:** In addition, concrete batch plant and rock crushing equipment will be used during construction of the proposed LAMP. If permit modifications are required, the Lead Agency should be aware that the SCAQMD permits will include emission limits consistent what was analyzed in the Final EIR. Permit questions can be directed to SCAQMD Engineering staff at (909) 396-2504.

**Response:** The emissions from concrete batching were calculated and included in the peak daily construction emission inventories included in the Draft EIR, Section 4.2.1, Air Quality, Table 4.2.1-7 (page 4.2-34), Table 4.2.1-8 (page 4.2-35), Table 4.2.1-26 (page 4.2-59), and Table 4.2.1-27 (page 4.2-60). The peak batching emissions were based on a peak concrete production of approximately 61,300 cubic yards per month[1] from up to three (3) batch plants. The current LAX Title V permit issued on April 29, 2015, indicates that the maximum allowable concrete production rate totaled across all batch plants is 78,830 cubic yards per month.[2] Based on this analysis, modification to the existing batch plant permit would not be necessary for the LAX Landside Access Modernization Program Project construction.

[1] The monthly throughput is not explicitly included in the Draft EIR, although total concrete deliveries by project element were included in Appendix F.1 of the Draft EIR, page 63 of the Appendix F PDF file. That summary of concrete demand was based on project component delivery data contained in the LAX Landside Access Modernization Program Air Quality Modeling & Assumptions document prepared March 9, 2016 (CONNICO Incorporated, Los Angeles International Airport Landside Access Modernization Program (LAMP) – Air Quality Modeling Data & Assumptions, March 9, 2016). Peak month concrete batching volumes were calculated by applying a ratio (number of construction days in each month versus total number construction days of a given project component) to the total cubic yards of concrete required for each project component. The start and end dates of construction for each project component are available in the Master Schedule provided in Appendix F of the Draft EIR (pages 55 through 61), and total cubic yards of concrete for each project component were calculated from the number of required concrete deliveries with a concrete delivery truck volume of 10 cubic yards. The calculation of concrete demand is now included in the Final EIR, Appendix F.1, Batch Plant Permit Analysis.

[2] Los Angeles World Airports, Construction and Operation Compliance Manual to LAWA Operators for SCAQMD Air Quality Permit for Concrete/Asphalt Crushing Operations and Concrete Batch Plants and Baghouses, May 12, 2015.

**LAMP- AR00001-6**

**Comment:** Recommended Change to Construction Mitigation Measure MM-1e:

Because the Lead Agency has determined that Project construction emissions will exceed the SCAQMD recommended daily construction threshold for Oxides of Nitrogen (NOx), the SCAQMD staff recommends the following change to Mitigation Measure Number 1e:[2]

"All diesel-fueled equipment used for construction will be outfitted with the best available emission control devices, where technologically feasible, primarily to reduce emissions of diesel particulate matter (PM), including fine PM (PM2.5), and secondarily, to reduce emissions of NOx. This requirement shall apply to diesel-fueled off-road equipment (such as construction machinery), diesel-fueled on-road vehicles (such as trucks), and stationary diesel-fueled engines (such as electric generators). (It is unlikely that this measure will apply to equipment with Tier 4 engines.) The emission control devices utilized in construction equipment shall be verified or certified by California Air Resources Board or US Environmental Protection Agency for use in on-road or off-road vehicles or engines. For multi-year construction projects, a reassessment of equipment availability, equipment fleet mixtures, and best available emissions control devices shall be conducted annually. ~~to determine what constitutes a best available emissions control device. "~~

[2] DEIR, Page 4.2-54, Table 4.2.1-23 Construction-Related Air Quality Control Measures.

**Response:** The SCAQMD proposed revisions to the Construction-Related Air Quality Mitigation Measure 1e. LAWA generally agrees with the proposed revisions, with some modification. LAWA's existing construction policy includes third-party mitigation monitoring compliance by an on-site monitor who reviews all equipment utilized on LAX construction projects. Because of this existing third-party monitoring, the modification of the revised measure limits annual reviews to equipment brought on site in that year. In response, Table 4.2.1-23 in Section 4.2.1.7 of the Draft EIR has been revised as shown below. Please also see Chapter 3, Corrections and Additions to the Draft EIR.

1.e All diesel-fueled equipment used for construction will be outfitted with the best available emission control devices, where technologically feasible, primarily to reduce emissions of diesel particulate matter (PM), including fine PM (PM2.5), and secondarily, to reduce emissions of NOx. This requirement shall apply to diesel-fueled off-road equipment (such as construction machinery), diesel-fueled on-road vehicles (such as trucks), and stationary diesel-fueled engines (such as electric generators). (It is unlikely that this measure will apply to equipment with Tier 4 engines*, as these engines typically already incorporate the best available emission control devices*.) The emission control devices utilized in construction equipment shall be verified or certified by California Air Resources Board or US Environmental Protection Agency for use in on-road or off-road vehicles or engines. For multi-year construction projects, a reassessment *of equipment availability, equipment fleet mixtures, and best available emissions control devices* shall be conducted annually *for equipment newly brought to the project site each year*~~to determine what constitutes a best available emissions control device~~.

**LAMP- AR00001-7**

**Comment:** Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality

Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

**Response:** Written responses to all comments contained in the letter from SCAQMD will be sent to SCAQMD at least 10 days prior to certification of the Final EIR. The availability of SCAQMD's staff for continued coordination with LAWA regarding the LAX Landside Access Modernization Program is appreciated.

## LAMP-AL00001 Poosti, Ali City of Los Angeles Bureau of Sanitation 10/24/2016

**LAMP-AL00001-1**

**Comment:** LOS ANGELES INTERNATIONAL AIRPORT (LAX) LANDSIDE ACCESS MODERNIZATION PROJECT (LAMP) - DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

This is in response to your September 15, 2016 letter requesting a review of your proposed landside access modernization project located at 380 World Way, Los Angeles CA 90045. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to roadway improvements and the Automated People Mover (APM) system only. Currently, the project description does not identify facilities that will have a significant impact to the capacity upon the sanitary sewer network.

Based on the project description, at this time we have determined the project is unrelated to sewer capacity availability and therefore do not have sufficient details to offer an analysis at this time. Should the project description change, please continue to send us information so that we may determine if a sewer assessment is required in the future.

If you have any questions, please call Eduardo Perez of my staff at (323) 342-1562.

**Response:** As discussed in Chapter 2, Description of the Proposed Project, of the Draft EIR, the proposed Project involves an airport modernization program that contains several individual components that would collectively improve access to and from LAX. These components include an Automated People Mover (APM) system, Intermodal Transportation Facilities (ITFs), a Consolidated Rental Car Facility (CONRAC), pedestrian walkway connections, and roadway improvements. The development of these proposed Project components would introduce new occupied uses that would contribute wastewater demand within the City.

Section 4.13, Utilities and Service Systems, of the Draft EIR contains information related to existing wastewater conditions (see Section 4.13.3.4.2). As noted on page 4.13-29 of the Draft EIR, the proposed Project's potential interference with major utility facilities including wastewater lines located within roadways that would need to be widened or may need to be shifted to match new roadway improvements. However, as noted, most utility lines, including wastewater lines, are located under the existing streets and would not be affected.

As part of the construction permitting, precise locations of existing and future utility features within the roadway rights-of-way would be identified in coordination with responsible agencies, including the City of Los Angeles Bureau of Engineering. To accommodate the construction of the APM Guideway and support columns, water and sewer utilities that the proposed Project would potentially affect during construction would be relocated or protected in place. As noted on page 4.13-38 of the Draft EIR, once construction is complete and infrastructure within the Project area

has been relocated or protected, the proposed Project would not substantially interfere with wastewater infrastructure. No impacts would occur.

Section 4.13.3.6 of the Draft EIR identifies water demand estimates for the proposed Project based on land use generation factors development by the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates. As indicated on page 4.13-35 of the Draft EIR, it is estimated that 80 percent of the Project's anticipated water demand (approximately 122,000 gallons per day) would be conveyed into the local sewer system.

As discussed in Section 4.13.3.4.2, of the Draft EIR, the Hyperion Treatment Plant (HTP) provides treatment capacity for all wastewater flows generated within the Project area. The HTP currently processes average wastewater flows of approximately 275 million gallons per day (mgd), but has a capacity to process dry weather flows of approximately 450 mgd. The proposed Project's estimated wastewater demand would represent less than 1 percent of HTP's available flow capacity.

The proposed Project would not require new wastewater facilities and infrastructure, or capacity-enhancing alterations to existing facilities (refer to page 4.13-38 of the Draft EIR). The proposed Project would only require new connections at the point of contact to existing mains, trunk lines, and service lines currently providing wastewater service throughout the Project area. As such, the proposed Project impacts on wastewater facilities would be less than significant.

**LAMP-AL00001-2**

**Comment:** STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook - Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

**Response:** As presented in Section 4.7.7 of the Draft EIR, beginning on page 4.7-42, the proposed Project includes three mitigation measures related to stormwater management: specifically, MM-HWA (LAMP)-1. Stormwater Management Facilities (Project-Specific); MM-HWA (LAMP)-2. Stormwater Management Facilities (Project-Specific); and, MM-HWA (LAMP)-3. Stormwater Management Facilities (Programmatic). Additionally, as discussed in Section 4.7.5.1.2 of the Draft EIR, the update to the existing Conceptual Drainage Plan for LAX that occurs with the completion of the comprehensive Stormwater Management Plan for LAX would integrate the applicable BMP requirements related to the SUSMP and the City's LID Ordinance. The stormwater LID Ordinance requires 100 percent of rain water from a 0.75-inch rainstorm to be completely captured, infiltrated, and/or used on-site for development and redevelopment projects using capture methods and BMPs. The SUSMP BMP design criteria require a retention volume to

the 0.75 inch, 24-hour rain event or the 85th percentile, 24-hour rain event. The overall BMP program for the proposed Project would be sized to meet the LID specifications relative to addressing runoff volumes for the 85th percentile storm event. Table 4.7-8 on page 4.7-37 of the Draft EIR presents the runoff volumes associated with the 85th percentile storm event that would be addressed in the BMP program for each Project component, and Mitigation Measure MM-HWA (LAMP)-1 on pages 4.7-42 and 4.7-43 describes the general types of BMPs available to meet the stormwater management requirements of each Project component. The specifics of the stormwater management BMPs to be implemented for each Project component would be defined in conjunction with SUSMP/LID plan review through the City of Los Angeles, Bureau of Sanitation, Watershed Protection Division.

**LAMP-AL00001-3**

**Comment:** GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

**Response:** Implementation of the proposed Project will comply with all applicable requirements of the City, including applicable provisions of the Green Street Initiative once approved/adopted by the City. Additionally, it should be noted that Mitigation Measure MM-HWA (LAMP)-1, Stormwater Management Facilities (Project-Specific), presented on pages 4.7-42 and 4.7-43 of the Draft EIR indicates that approximately 2.5 acres of swales will be provided for Project roadways, which is consistent with the goals of the Green Street Initiative, as described in the comment. As part of the LAX Landside Access Modernization Program, LAWA is adopting Design Guidelines (see Appendix B of the Draft EIR), which are also consistent with the Green Street Initiative.

**LAMP-AL00001-4**

**Comment:** CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485- 0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

**Response:** As acknowledged in Section 4.7.5.1.2 of the Draft EIR, beginning on page 4.7-33, the Project would be required to develop a site-specific Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System Program General permits authorized under the Clean Water Act for construction activities. As required under the State Water Resources Control Board (SWRCB) General Permit for Construction Activities, LAWA has prepared stormwater BMP guidance instructions in the Design and Construction Handbook applicable to airport improvement projects. This document outlines the procedures for preparing and implementing a construction SWPPP before beginning any construction activities so that the activities are in compliance with the general permit, and water quality impacts are minimized. In addition to specifications for meeting SWRCB General Permit requirements for construction projects that disturb more than one acre, including, but not limited to, the requirement to file a Notice of Intent with the state, LAWA's construction stormwater guidance includes provisions for construction projects that disturb less than one acre, with such requirements being consistent with those of the City's Wet Weather Erosion Control Plan requirements.

LAWA appreciates the Watershed Protection Division (WPD) contact information provided in the comment, and will continue to work closely with WPD in addressing stormwater matters.

**LAMP-AL00001-5**

**Comment:** GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

**Response:** As indicated on page 4.7-37 in Section 4.7.5.1.3 of the Draft EIR, construction and operation of the proposed Project would not require the use of groundwater, and thus, would not draw upon groundwater supplies.

**LAMP-AL00001-6**

**Comment:** On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer

and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

**Response:** Please see Response to Comment LAMP-AL00001-5 above.

**LAMP-AL00001-7**

**Comment:** To help offset costs of water conservation and reuse systems, LADWP offers the Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of $1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

**Response:** LAWA appreciates the offer from LADWP for engineering and technical assistance on qualified projects, and the information provided regarding financial incentives and other water conservation assistance programs.

**LAMP-AL00001-8**

**Comment:** SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

**Response:** The comment notes that the City of Los Angeles has recycling requirements for development projects. As such, development projects must set aside a recycling area or room for onsite recycling activities.

As discussed on page 4.13-1 in Section 4.13, Utilities and Service Systems, of the Draft EIR, the proposed Project's potential impacts on landfill capacity and solid waste were determined to be less than significant as part of the Initial Study for the proposed Project (refer to Appendix A of the Draft EIR). The proposed Project would include recycling during construction and operation as required. As noted on page 4.13-1 of the Draft EIR, the proposed Project would comply with federal, state, and local statutes and regulations related to solid waste, as well as LAWA's recycling program. As discussed in Section 3.3.12 of the Draft EIR, LAWA's recycling program, which has been in place since 1992, is a comprehensive, facility-wide recycling program aimed to reduce solid waste generated and disposal at LAX. LAWA's recycling program includes collection of recyclable materials generated by LAWA and within airport terminals and airfield areas, collection of materials from airlines and tenants; independent airline and tenant recycling programs; and source reduction through purchase of recycled products and reuse of materials.

In regards to construction and demolition activities, the proposed Project would adhere to LAWA's Sustainable Airport Planning, Design and Construction Guidelines, described on pages 4.13-7 and 4.13-8 of the Draft EIR. These Guidelines provide goals and performance standards for recycling of materials during both construction and operation of airport facilities. For example, as noted on page 119 of the Initial Study (see Appendix A of the Draft EIR), pavement removed from the Project site would be used as filler below any new paving, and any materials would be reused to the extent possible to reduce the amount of construction waste taken to a City-certified construction demolition waste processing facility.

## LAMP-AL00002 Pullen-Miles, Robert City of Lawndale 10/27/2016

**LAMP-AL00002-1**

**Comment:** On behalf of the City Council of the City of Lawndale, **I** would like to take this opportunity to provide comments and express concerns on the proposed LAX Landside Access Modernization Program (LAMP), as outlined in the Draft Environmental Impact Report (DEIR). While the City understands that there are a number of potential benefits associated with the project, the City remains concerned that substantial impacts to the citizens of Lawndale are not being adequately presented in the DEIR. Similarly, those impacts are not targeted for potential mitigation or improvements that could reduce the effects to be endured by the community as a result of the project. We respectfully submit these comments to help ensure that local decision makers fully comply with the California Environmental Quality Act (Public Resources Code § 21000 *et seq.,* "CEQA") and the CEQA Guidelines (14 Cal. Code of Regulations §§ 15000 - 15387) with respect to the project. The following list outlines the City's comments and concerns:

**Response:** Please see Responses to Comments LAMP-AL00002-2 through LAMP-AL00002-18 below regarding the adequacy of the analysis and mitigation in the LAX Landside Access Modernization Program Draft EIR.

**LAMP-AL00002-2**

**Comment:** - Aesthetics. The Aesthetics section of the program DEIR is inadequate. The Aesthetics section of the DEIR did not identify, study, or mitigate the potential impacts on the surrounding areas of the project. The proposed project will have significant impacts on the surrounding environment including businesses and neighborhoods.

**Response:** Section 4.1, Aesthetics, of the Draft EIR evaluates the impacts of the proposed Project on aesthetics and visual character, obstruction of views, nighttime illumination, light and glare, and shading. As discussed in Section 4.1.2.1, Visual Character, of the Draft EIR, "[t]he study area for the aesthetics analysis comprises LAX property and areas surrounding LAX potentially affected by implementation of the proposed Project." As noted in Section 4.1.4. Thresholds of Significance, the evaluation of aesthetic impacts considered several different thresholds that address not only the Project site but the "neighborhood, community, or localized area".

As discussed on pages 4.1-1 through 4.1-5 of the Draft EIR, the study of the existing visual character of the Project site included the photo reconnaissance of the significant views of the Project area along major roadways and other public viewpoints on and surrounding the Project site to the north, east, south, and west where substantial visual change would occur with implementation of the proposed Project. As shown on Figure 4.1-1, as well as in Figures 4.1-2 through 4.1-23 of the Draft EIR, 22 viewpoint locations were considered in the analysis of the proposed Project. As identified on pages 4.1-5 through 4.1-7 of the Draft EIR, the shading impacts were evaluated using simulated shading diagrams that illustrate the shading patterns

associated with the proposed Project. Lastly, as identified on page 4.1-7 of the Draft EIR, the light and glare impacts were analyzed based on the potential for the proposed Project to introduce new lighting and glare sources that could cause light spillover or adversely affect day or nighttime views. The evaluation of these visual character, shading, and light and glare impacts considered the potential changes to the Project site and surrounding areas.

As indicated in Section 4.1.5 of the Draft EIR, the Project site consists of high-density development that currently limits available views. Additionally, the Project site currently contains many sources of shading and sources of light and glare typical of a highly-developed area. The proposed Project would introduce a modern airport transportation system that would support the function of a transportation-oriented environment near the Airport. As discussed on page 4.1-74 of the Draft EIR, as the Project site does not contain any notable views or valued aesthetic resources, the development of the proposed Project components would not obstruct, interrupt, or diminish a valued focal or panoramic view from any designated scenic highway, corridor, or parkway. Further, the analysis concluded on pages 4.1-86 to 4.1-88 of the Draft EIR that the proposed Project would not introduce any structures or sources of light that would result in significant impacts to shadow- and light-sensitive uses, as defined by the L.A. CEQA Thresholds Guide.[1]

In summary, the evaluation of aesthetic impacts in Section 4.1 of the Draft EIR is complete, adequate, and meets the requirements of CEQA. Furthermore, the City of Lawndale is located approximately 3 miles southeast of the proposed structural elements of the LAX Landside Access Modernization Program (the Consolidated Rental Car Facility, Automated People Mover, and Intermodal Transportation Facilities). At this distance, the proposed LAX Landside Access Modernization Program would have no aesthetic impact on the City of Lawndale or its residents.

[1] City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles, 2006.

**LAMP-AL00002-3**

**Comment:** - Air Quality. The Air Quality section of the program DEIR is inadequate and incomplete. The Air Quality sections of the Program DEIR did not address or identify traffic trips and the emissions generated from the significant amount of traffic trips that will be generated as a result of this proposed project. This proposed project will create a significant amount of air quality issues locally and regionally.

**Response:** Emissions from motor vehicles on the roadways and parking lots around LAX represent the primary source of emissions analyzed for LAX Landside Access Modernization Program Project operations, as noted in Draft EIR Section 4.2.1, Air Quality (see Section 4.2.1.3, Methodology, for operational mobile sources on pages 4.2-10 and 4.2-11). In addition, trucks and worker vehicles associated with LAX Landside Access Modernization Program Project construction were also analyzed (see Section 4.2.1.3, Methodology, for construction on-road off-site equipment on pages 4.2-8 and 4.2-9). Air quality emissions, concentrations, and health risk impacts from roadway traffic are summarized in the Draft EIR Section 4.2.1, Air Quality, and Section 4.2.2, Human Health Risk Assessment and detailed in Appendix F as noted below.

The LAX Landside Access Modernization Program Project operational traffic roadway link volumes and parking volumes as well as associated emissions are presented in Appendix F, Attachment F.4 of the Draft EIR (pages 571 through 736). The regional operational roadway traffic and parking criteria air pollutant emissions are summarized in the Draft EIR, Section 4.2.1, Air Quality, Tables 4.2.1-9, 10, 11, 12, 13, 28, 29, 30, and 31 (pages 4.2-36, 37, 38, 39, 40, 61, 61, 62, and 63, respectively). The local roadway traffic criteria pollutant concentrations are

summarized in the Draft EIR, Section 4.2.1, Air Quality, Tables 4.2.1-14, 15, 16, and 17 (page 4.2-41, 42, 44, and 45, respectively). Regional construction criteria pollutant emissions are summarized in the Draft EIR, Section 4.2.1, Air Quality, Table 4.2.1-7 on page 4.2-34. The local construction criteria pollutant concentrations are summarized in the Draft EIR, Section 4.2.1, Air Quality, Table 4.2.1-8 on page 4.2-35.

Regional construction criteria pollutant emissions, local construction criteria pollutant concentrations, operational regional criteria pollutant emissions, and local operational criteria pollutant concentrations for the potential future related development are identified and discussed in Section 4.2.1.6.2 of the Draft EIR, and presented in Tables 4.2.1-18 through 4.2.1-21 (pages 4.2-43 through 4.2-50).

Operational traffic-related health risks are summarized in the Draft EIR, Section 4.2.2, Human Health Risk Assessment, Tables 4.2.2-7, 8, 9, 10, and 11 (pages 4.2-111, 127, 134, 135, and 137, respectively), and Figures 4.2.2-8, 9, 10, 11, 12, 13, 14, 15, 16, and 17 (pages 4.2-113, 115, 119, 121, 123, 125, 129, 131, 139, and 141, respectively). Construction-related health risks are summarized in the Draft EIR, Section 4.2.2.4.1, Tables 4.2.2-2 through 4.2.2-6 (pages 4.2-92 through 4.2-108).

Therefore, the Draft EIR analyzed traffic-related emissions and impacts on air quality, including human health risk. The Draft EIR is not inadequate with regard to these analyses as claimed by the commentor.

**LAMP-AL00002-4**

**Comment:** - Lack of Mitigation Measures. The Initial Study prepared for the project identified several areas of significant environmental impacts including: Aesthesis; Greenhouse Gases; Land Use Planning; Transportation/Traffic; Hazards & Hazardous Materials; Air Quality; and Noise sections. However, despite this acknowledgement of significant environmental impacts, the Program DEIR lacked, deferred, and obfuscated proposing adequate mitigation measures to address the issues outlined in the Initial Study.

**Response:** The Initial Study prepared for the LAX Landside Access Modernization Program did not identify a significant impact for the resource areas listed by the commentor, but rather a **potential** for significant impact, to be studied further in the EIR. Analyses of these resource areas were discussed in the Draft EIR in the following locations:

- Aesthetics, Section 4.1 (significant impacts identified, mitigation measures proposed)
- Greenhouse Gases, Section 4.5 (significant impacts identified, mitigation measures proposed)
- Land Use Planning, Section 4.8 (no significant impacts identified)
- Transportation/Traffic, Section 4.12 (significant impacts identified, mitigation measures proposed)
- Hazards and Hazardous Materials, Section 4.6 (significant impacts identified, mitigation measures proposed)
- Air Quality, Section 4.2 (significant impacts identified, mitigation measures proposed)
- Noise, Section 4.9 (significant impacts identified, mitigation measures proposed))

The LAX Landside Access Modernization Program Draft EIR proposed mitigation for all significant impacts. While it is not possible to mitigate some impacts to a less than significant

level, the Draft EIR proposes all feasible measures to lessen the impact to the extent feasible. Additionally, LAWA identified Standard Control Measures that would be applied to the proposed Project even though a particular Project impact might be less than significant (see Section 4.13.2.10 on page 4.13-21 in Section 4.13.2, Energy/Appendix F, of the Draft EIR). Standard Control Measures are measures that implement existing regulations and/or LAWA plans and policies that would reduce or avoid potential environmental impacts. This comment does not identify any specific mitigation measures claimed to be inadequate, or suggest any specific additional mitigation measures that the Draft EIR failed to consider.

**LAMP-AL00002-5**

**Comment:** The traffic study includes "Fair Share" mitigation solutions to impacts created on the area freeways; however, funding for construction of these projects is not identified.

**Response:** During preparation of the traffic study for the LAX Landside Access Modernization Program Draft EIR, LAWA worked closely with Caltrans to develop and reach agreement on the study's methodology, analysis, impacts and mitigation measures on the state highway system, including the freeways within the Project study area. Caltrans' Guide For The Preparation of Impact Studies[1] includes information on methods for determining a project's equitable share responsibility of agreed upon mitigation measures.

Caltrans' November 15, 2016 comment letter regarding the LAX Landside Access Modernization Program Draft EIR (LAMP-AS00002) included the following information related to this subject:

- "Caltrans staff met with LAWA, the City of Los Angeles, and Metro on numerous occasions to identify and discuss the study area. Early coordination meetings provided several opportunities to collectively identify the potential impacts this project may have on the State Highway System and develop mitigation measures to minimize those effects." (see Comment LAMP-AS00002-3)
- "We acknowledge the traffic analysis identifies various segments along I-105 and I-405 that operate deficiently under conditions. The proposed Project will fund a fair-share contribution to the improvements … to address the significant freeway impacts." (see Comment LAMP-AS00002-9)
- "Provision of fair-share contribution to these cumulative impacts are considered as mitigation, per Caltrans' guidelines." (see Comment LAMP-AS00002-9)
- "All mitigation discussed were developed and accepted in agreement with Caltrans staff. Caltrans also acknowledges the project applicant has agreed to pay its fair-share of any feasible improvements that may be implemented at the significantly impacted segments." (see Comment LAMP-AS00002-11)

[1] State of California, Department of Transportation, Caltrans, Guide for the Preparation of Traffic Impact Studies, Appendix B, December 2002, Available: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf.

**LAMP-AL00002-6**

**Comment:** - Land Use Planning. The Program DEIR mentions amendments to the City of Los Angeles Land Use Element, Transportation Element, LAX Plan, the LAX Specific Plan, yet does not provide any analysis or propose any mitigation measures. The Program DEIR does not mention or address the environmental impacts associated with changes to community plans or zoning designations.

The information provided in the Program DEIR is incomplete, deficient, and lacks clarity with regards to the potential environmental impacts.

**Response:** The various plan modifications proposed as part of the LAX Landside Access Modernization Program are described in Section 2.8 of Chapter 2, Description of the Proposed Project, of the Draft EIR. The changes proposed to the LAX Plan and LAX Specific Plan are further described Chapter 7, Evaluation of Amendments to the LAX Plan and the LAX Specific Plan, of the Draft EIR, and are set forth in full in Draft EIR Appendix C and Appendix D (as revised in Chapter 3, Corrections and Additions to the Draft EIR). As stated in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, the proposed Project would include amendments to the LAX Plan (which is part of the City of Los Angeles General Plan Land Use Element) to include descriptions of the proposed transportation facilities. In addition, the Belford Special Study Area would be updated to reflect the proposed use of this area under the Project, Airport Landside. Amendments would include changes to the text of the LAX Plan as well as updates to the associated figures. Text changes to the LAX Plan include updating the Vision for LAX; updating the goals and objectives to reflect the proposed Project; adding a description of a new Airport Landside Support Area; updating policies to reflect the proposed Project and other programs; and removing text regarding projects that are no longer relevant. Plan Areas would be updated to include: additional areas that are currently located in the Westchester-Playa del Rey Community Plan; areas in which the proposed facilities would be located; and to change the designation of the Belford Special Study Area to Airport Landside. In addition, LAX Plan maps and diagrams would be updated to reflect the proposed plan area changes.

Section 2.8.1.3 in Chapter 2 of the Draft EIR discusses the amendments to the Mobility Plan 2035 (Transportation Element of the General Plan). Amendments to the Mobility Plan 2035 are map changes to reflect the proposed classification of streets that would be modified by the proposed Project and changes to the Bike Plan that would be modified by the proposed Project.

The proposed Project would also include amendments to the LAX Specific Plan to update the text of the plan to reflect the proposed transportation components. Amendments would include: changes in the text of the LAX Specific Plan to facilitate implementation of the programs and policies in the plan; the addition of an Airport Landside Support Subarea; reorganization of text for consistency and clarity; removal of the parking regulations which are specific to the LAX Master Plan; clarification of which parcels within the LAX Specific Plan are subject to the trip generation provisions of the LAX Specific Plan; changes to the LAX Specific Plan compliance review; replacement of mitigation and reporting requirements for traffic generation and aviation activity related to the LAX Master Plan with reporting requirements that would be standard practice for all projects; removal of certain additional study requirements that would be fulfilled as part of the Landside Access Modernization Program Project; and the addition of LAX Design Guidelines, as well as updates to the associated figures. The LAX Specific Plan would also be amended to allow the Executive Director to authorize the sale, dispensing, and consumption of alcohol beverages within sterile areas of the Airport or related off-site sterile areas without having to obtain a Conditional Use Permit from the Department of City Planning.

Contrary to the commentor's assertion, Section 4.8.5.1.1 of the Draft EIR contains an analysis of the land use impacts associated with the proposed Land Use Plan amendments, Section 4.8.5.1.2 of the Draft EIR contains an analysis of Land Use Plan Consistency, the remainder of Chapter 4 contains an analysis of the impacts of the Project including land use changes associated with plan amendments that would occur as part of the Project, and Section 7.3 of the Draft EIR contains an environmental analysis of the changes to the plans that were not discussed in Chapter 4. As stated in Section 7.3, the proposed amendments to the LAX Plan and LAX Specific plan would not result in any additional impacts beyond those described in Chapter 4.

Mitigation measures are proposed, as appropriate, for significant impacts associated with the proposed Project, including the plan amendments.

**LAMP-AL00002-7**

**Comment:** The DEIR appears to understate impacts to residential uses, as well as homeless populations. The DEIR appears to underestimate homeless populations that will be impacted by the project. Other than underestimating the number of people directly impacted, the DEIR is silent on this enormous social impact on the area. The DEIR concludes that there is not a "substantial number of people" being displaced and that the impacts will be "less than significant". Lawndale disagrees with these conclusions. There are a "substantial" number of people who are being impacted by this project and this should require that LAWA participate financially in the construction of transitional and replacement housing.

**Response:** Section 4.10.5.1.2 in Section 4.10, Population and Housing, addresses the housing that would be displaced as a result of the proposed Project. Section 4.10.5.1.3 in Section 4.10, Population and Housing, addresses the population in the housing to be relocated as part of the proposed Project. As discussed on page 4.10-19 of the Draft EIR, the housing and associated population being displaced by the proposed Project are located in areas that have been part of the Los Angeles World Airports Relocation Plan: Manchester Square and the Belford Area,[1] also known as the Aircraft Noise Mitigation Plan (ANMP) for the Belford and Manchester Square areas, since 2000. As of June 2016, all but 38 residential parcels between the Belford and Manchester Square areas have been acquired through this voluntary acquisition program. The following address the issues raised by the commentor related to the homeless population that would be impacted by the proposed Project.

**Homeless Population Estimates**

Section 4.10, Population and Housing, of the Draft EIR includes a description of the Population and Housing Study Area evaluated (see Section 4.10.2.1). As shown on Figure 4.10-1 of the Draft EIR, the Population and Housing Study Area includes the Project site and several surrounding communities. As identified on page 4.10-13 of the Draft EIR, the City of Lawndale falls within the Southern California Association of Government (SCAG) South Bay Cities Association Subregion, which encompasses a portion of the Population and Housing Study Area.

Section 4.10.2 of the Draft EIR provides a description of the methodology used to assess existing conditions. As noted therein, the primary source for homeless data used for the analysis in the Draft EIR is from the Los Angeles Homeless Services Authority (LAHSA), which presents homeless counts according to U.S. Census tracts. As identified on page 4.10-19 of the Draft EIR, six U.S. Census tracts fall within the boundaries of the Project site (2772.00, 2774.00, 6014.01, 6014.02, 6015.01, and 9800.28). The Belford and Manchester Square areas of the Project site are the two portions of the Project site to contain a known homeless population that would be affected by the proposed Project. The Belford and Manchester Square areas are identified by U.S. Census tracts, 2772.00 and 2774.00, respectively. The estimate of homeless presented in the Draft EIR was based on 2015 homeless count data as made available by the LAHSA. As indicated on page 4.10-23 of the Draft EIR, the 2015 homeless count data for Census Tracts 2772.00 and 2774.00 indicated that there were approximately 80 people living within the Project site in some state of homelessness. This data was reflective of the homeless population at the time the Notice of Preparation (NOP) for this EIR was published on February 5, 2015. As discussed on page 4-4 in Chapter 4, Environmental Impact Analysis, of the Draft EIR, in accordance with the provisions of CEQA, 2015 is the baseline year for characterizing existing conditions in the environmental analysis of the Draft EIR.

For informational purposes, please note that the LAHSA has updated their information and estimates since the preparation of the Draft EIR with LAHSA's 2016 homeless count data. For the portions of the Project site known to contain a homeless population (U.S. Census Tracts 2772.00 and 2774.00), LAHSA's most recent estimate indicates that there are approximately 360 homeless people living within the Project Site.[2]

As demonstrated by the differential between 2015 and 2016, the homeless counts are variable. Since 2005, LAHSA annually conducts its homeless counts to understand how to better meet the needs of the existing homeless population by improving the quality and variety of housing and services available.[3] The annual homeless counts are "Point-In-Time," or in other words a snapshot of the City's homeless population on the day the counts are conducted.[4]

Even when considering the most recent LAHSA 2016 homeless counts for the portions of the Project site known to contain a homeless population (U.S. Census Tracts 2772.00 and 2774.00), the conclusions presented in the Draft EIR would not change as discussed below.

**Potential Impacts and Need for Additional Mitigation**

Section 4.10.5.1.3, Displace Substantial Number of Existing People, of the Draft EIR notes that the existing homeless population would be relocated prior to the start of the Project (see page 4.10-31). As noted, this homeless population would likely be absorbed into the nearby surrounding communities, and not require the construction of new replacement housing elsewhere. Page 4.10-31 of the Draft EIR further notes that the County and City of Los Angeles currently offer a variety of services and housing opportunities that would be available to homeless population affected by the proposed Project. In addition, organizations, such as LAHSA, would participate in the coordination of programs and funding to address homeless needs, such as providing available housing, emergency shelters, and other programs and services. As discussed on page 4.10-31 of the Draft EIR, LAWA would coordinate with the City of Los Angeles to ensure the homeless population is aware of the available services and programs. This interagency coordination would occur prior to the start of construction of the proposed Project.

The change in the number of estimated homeless between the 2015 and 2016 would not result in any change in available services to address the homeless. Although the estimate has grown from approximately 80 in 2015 to 360 in 2016, the available services remain to serve this larger population, and LAWA would continue to work with the City to ensure that the homeless displaced by the proposed Project are made aware of the available services and programs.

The homeless population that would be displaced by the proposed Project would be accounted for through LAHSA's annual homeless count. Implementation of the proposed Project would not interfere with the ability for the County and City to combat homelessness and provide appropriate mechanisms for homeless individuals seeking available services. Councilmember Mike Bonin, in partnership with the Los Angeles Mayor's Office, County Supervisor Mark Ridley Thomas' Office and LAWA, have developed a City/County Task Force focused on providing outreach services and housing opportunities to homeless individuals residing in the Manchester Square neighborhood near LAX, and increasing law enforcement patrols to maintain a high quality of life for the remaining residents still living in the neighborhood. The Task Force consists of various City and County Departments responsible for providing homeless outreach services in Manchester Square including the Los Angeles Homeless Services Authority (LAHSA), the Los Angeles County Department of Mental Health, the Los Angeles Police Department's Homeless Outreach Partnership Endeavor (HOPE) Team, and non-profit outreach service provider People Assisting the Homeless (PATH). This team is augmented by the Los Angeles World Airports Police Division, Los Angeles Police Department, and other necessary City Departments such as the Los Angeles Bureau of Sanitation. Over the past year, the Task Force has provided a number

of individuals with access to housing, with many more currently in the process of searching for housing opportunities. The Task Force will continue to focus on this as the City and County work together to increase services in the area.

Also, the comment expresses concern about the social impact of homeless population relocation. However, under CEQA, social effects of a project are not treated as significant effects on the environment. CEQA Guidelines Section 15131(a).

[1] City of Los Angeles, Los Angeles World Airports, Final LAX Los Angeles World Airports Relocation Plan Voluntary Residential Acquisition/Relocation Program for the Areas Manchester Square and Airport/Belford, adopted by the Board of Airport Commissioners, June 2000.

[2] Los Angeles Homeless Services Authority, "Homeless Count 2016 Result by Census Tract." Total homeless population estimate for the Belford and Manchester Square areas is based on U.S. Census tracts 2772.00 and 2774.00.

[3] Los Angeles Homeless Services Authority, "Data & Reports–Information on Los Angeles County's Homeless Population," https://www.lahsa.org/homeless-count/reports, accessed December 2016.

[4] Los Angeles Homeless Services Authority, "Data & Reports–Information on Los Angeles County's Homeless Population," https://www.lahsa.org/homeless-count/reports, accessed December 2016.

**LAMP-AL00002-8**

**Comment:** - Program EIR/Project Specific EIR. The scope and scale for the proposed project is detailed enough to have completed a project level DEIR. The Program EIR does not identify, study, or mitigate the potential impacts on the surrounding areas, even though those impacts are already known to the Los Angeles World Airports (LAWA). Thus, a Project Level DEIR must be prepared for the proposed project and the Program DEIR is inadequate and incomplete pursuant to CEQA.

**Response:** As specified in Section 1.2 of the Draft EIR, the EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines for the following purposes:

- To evaluate the potentially significant environmental effects associated with the implementation of the proposed Project, as required by CEQA;
- To indicate the manner in which those significant impacts can be avoided or significantly lessened;
- To identify any significant and unavoidable adverse impacts that cannot be mitigated;
- To identify reasonable and feasible alternatives to the proposed Project that would eliminate any significant adverse environmental impacts or reduce the impacts to less-than-significant levels;
- To inform the general public, the local community, and responsible trustee, State, and federal agencies of the nature of the proposed Project, its potentially significant environmental effects, feasible mitigation measures to mitigate those effects, and reasonable and feasible alternatives;
- To enable LAWA decision-makers to consider the environmental consequences of the proposed Project and make findings regarding each significant effect that is identified;

- To provide a basis for preparation of any future environmental documents; and
- To facilitate responsible agencies in issuing permits and approvals for the proposed Project.

Chapter 4 of the Draft EIR identifies and discusses the potential impacts of the proposed Project within the Study Area. For most resource areas, the potential effects of the Project are limited to areas close-in to the Airport. However, for traffic and air quality, the Study Area included 183 intersections located in 8 jurisdictions (see Section 4.12.2.2.1 in Chapter 4 of the Draft EIR). The LAX Landside Access Modernization Program is defined as a "Project" on page 2-4 of the Draft EIR and was analyzed at a project-level throughout the Draft EIR. Page 2-6 of the Draft EIR notes the following elements only were examined at a program level:

> LAWA would utilize adjacent land for construction staging, construction activities, and/or temporary relocation areas to build the APM, CONRAC, ITFs, roadway improvements and other Project elements. Once the APM, CONRAC, and ITFs are constructed and operational, which is anticipated by early 2024, additional future complementary development may occur on land owned by LAWA located adjacent to these facilities. Such future development is envisioned to support the needs of passengers, visitors, employees, and guests of hotels in the area. Because no specific development projects are proposed for these areas, certain assumptions concerning this potential future related development are identified, and impacts are assessed in this EIR at a program level. Accordingly, such future related development would be subject to subsequent environmental review once LAWA develops more detailed and definitive plans for these areas.

Section 2.9, Intended Uses of this Draft EIR, located in Chapter 2, Description of the Proposed Project, identifies which elements of the LAX Landside Access Modernization Program were analyzed at a project level versus program level. All elements of the LAX Landside Access Modernization Program that LAWA has sufficient planning information were assessed at a project level except for the potential related future development, where no specific development projects have been proposed. See also Section 2.7 of the Draft EIR for additional discussion on the potential related future development. In addition, the labeling of an EIR as "program" versus "project" does not determine the adequacy of an EIR; rather EIR adequacy is determined by whether EIR impact analyses provide the appropriate level of detail for a given proposed project. (See *Citizens for Sustainable Development v. City and County of San Francisco* (2014) Cal.App. 4th 1036, 1051.)

**LAMP-AL00002-9**

**Comment:** - Piecemealing. The impacts of the entire project, not just individual segments, should be analyzed. CEQA forbids "piecemealing" projects. Pursuant to CEQA, the whole of the entire project must be analyzed and those environmental considerations related to project(s) broken down into little projects. Reducing or minimizing the potential impacts to the environment through "piecemeal" is prohibited. Potential growth impacts, such as new development projects, cannot be deferred to be analyzed in a piecemeal fashion at a later time. Rather, "the need for regional environmental consideration [must be made] at the earliest stage of a planned development before it gains irreversible momentum." (*Bozung v. Local Agency Formation Commission of Ventura County* (1975) 13 Cal.3d 263, 284, fn. 28.) An agency cannot treat one integrated large project as a succession of smaller projects to avoid analyzing the environmental impacts of the whole project. (See, *CASDBA v. County of Inyo* (1985) 172 Cal. App. 3d 151, 165-166 [two separate "packages" of entitlements for one project, each analyzed in a separate Negative Declaration, improper].)

The DEIR's project description mentions the proposed future Metro 96th Street Connector project which also includes the future extension of the Metro's Green Line. However, the entire DEIR is deficient in identifying and analyzing the potential impacts of the proposed future Green Line extension. Additionally, there are two separate EIR's currently being drafted by Metro dealing with another segment for the proposed South Bay Green Line extension. Drafting three different EIR's documents for the same Green Line project is in violation of the CEQA and considered "piecemeal" in violation of CEQA and understates the cumulative environmental impacts of the whole project.

This proposed project, as well as the 96th Street Connector transit station should be proposed in conjunction with the Draft EIR for the South Bay Metro Green Line Extension and not as a separate projects.

**Response:** As the CEQA Lead Agency, LAWA has adequately analyzed and assessed the potential environmental effects of the proposed LAX Landside Access Modernization Program, the Project that LAWA proposes to implement, including impacts of potential future related development. As discussed below, the Metro projects discussed in the comment are not part of the proposed Project, are proposed by another agency (Metro), and have independent utility from the proposed Project. Thus, the Draft EIR did not improperly "piecemeal" the proposed Project.

As part of the proposed Project, LAWA would provide a connection to the Metro Crenshaw/LAX light rail line at Metro's proposed Airport Metro Connector (AMC) 96th Street Transit Station to be located at Aviation Boulevard and 96th Street. The Draft EIR notes on page 2-5 that Metro is independently working on a connection to the airport along the Metro Crenshaw/LAX light rail line at their proposed AMC 96th Street Transit Station. Metro released a Draft EIR assessing the potential environmental effects of the proposed AMC 96th Street Transit Station in June 2016,[1] released a Final EIR on November 2, 2016,[2] and certified the Final EIR on December 1, 2016.[3]

The proposed AMC 96th Street Transit Station is a separate and independent project from the LAX Landside Access Modernization Program. LAWA proposes to implement the LAX Landside Access Modernization Program regardless of whether Metro constructs the AMC 96th Street Transit Station; furthermore, the LAX Landside Access Modernization Program is not dependent on whether or not the AMC 96th Street Station is constructed. The Crenshaw/LAX light rail line is also a separate and independent project undertaken by Metro, that is currently under construction. Please note that the Draft EIR includes both the Crenshaw/LAX light rail line and AMC 96th Street Station as cumulative projects for purposes of cumulative impact analysis; see Section 3.4 and Table 3-1, as revised in Chapter 3, Corrections and Additions to the Draft EIR.

[1] Los Angeles County Metropolitan Transportation Authority (Metro), Airport Metro Connector 96th Street Transit Station, Draft Environmental Impact Report, June 2016, Available: https://www.metro.net/projects/lax-extension/.

[2] Los Angeles County Metropolitan Transportation Authority (Metro), Airport Metro Connector 96th Street Transit Station, Final Environmental Impact Report, November 2016, Available: https://www.metro.net/projects/lax-extension/.

[3] Los Angeles County Metropolitan Transportation Authority (Metro), "First Measure M Project; Metro Rail Connection to LAX Metro Board Certifies Final EIR for Airport Metro Connector 96th Street Transit Station, December 1, 2016, Available: https://www.metro.net/news/simple_pr/first-measure-m-project-metro-rail-connection-lax-/.

**LAMP-AL00002-10**

**Comment:** - Program DEIR Project Description/Setting. The project description in the program DEIR is inadequate, inaccurate, and incomplete. The project description appears to be fluid and inter-changeable. CEQA mandates that the whole of the project be analyzed and that the entire project's scope must be analyzed and not deferred or relied upon for another lead agency to complete at some future date.

**Response:** The commentor asserts that the project description is inadequate, inaccurate, and incomplete, yet provides no specific references, substantial evidence or any other information in support of those claims. Chapter 2, Description of the Proposed Project, in the Draft EIR identifies all of the components of the proposed Project, which were analyzed in detail in Chapter 4, Environmental Impact Analysis, of the Draft EIR.

Page 4-4 of the Draft EIR identifies that the proposed Project would be completed in two phases consisting of the construction of all Project components, including: the Automated People Mover (APM) and associated facilities, both Intermodal Transportation Facilities (ITFs), the Consolidated Rental Car Facility (CONRAC), and a series of roadway improvements. The Draft EIR analyzes these Project components at a "project level" of detail. Page 4-4 of the Draft EIR also identifies that potential future related development of parcels that would be utilized for construction laydown and staging areas during construction of the proposed Project, but for which LAWA has no specific plans after that time. The Draft EIR analyzes this potential future development at a "program level."

Therefore, the Draft EIR's project description is adequate, accurate, and complete.

**LAMP-AL00002-11**

**Comment:** - Traffic Impacts. The proposed project will have tremendous traffic environmental impacts on the regional and locally based on the scale and scope of the project. The Program DEIR is incomplete, deficient, and inadequate and does not analyze traffic impacts to local roadways or to CALTRANS freeways including the State Routes 405 and 105. The program DEIR failed to address provide a traffic impact analysis or provide a measurable mitigation measures. Along these lines, Lawndale specifically observes:

**Response:** The Draft EIR is not a Program EIR. It presents project-level analyses other than for potential future related development, and includes detailed traffic impact analyses and mitigation measures.

Regarding operational traffic impacts, a comprehensive traffic study for the proposed LAX Landside Access Modernization Program is provided in Section 4.12.2, Off-Airport Transportation, and Appendix O, Off-Airport Traffic Study, of the Draft EIR. This study includes analysis of 183 intersections in 8 jurisdictions, 26 Caltrans ramp junctions and 23 Caltrans freeway segments along I-405, I-105, and SR-90.

The study scope, assumptions, parameters and analysis methodology were all coordinated with Caltrans, the SCAG, Metro, and various affected cities and the County of Los Angeles. The details of the traffic impact analyses can be found in Appendix O of the Draft EIR and results of the same are summarized in Section 4.12.2. Details of the impact analyses of the proposed Project in two phases are disclosed in Chapter 5 of Appendix O. Mitigation measures proposed in each of these phases to alleviate the significant impacts of the proposed project and their effectiveness are described in Chapter 6 of Appendix O.

Please also see the comment letter submitted by Caltrans (LAMP-AS00002) which shows that Caltrans agrees with the scope and methodology, the analysis results, and the proposed mitigation measures included in the assessment of impacts on the State Highway System presented in Section 4.12.2, Off-Airport Transportation, and Appendix O, Off-Airport Traffic Study, of the Draft EIR.

Similarly, regarding construction traffic impacts, the Draft EIR presents detailed traffic impact analyses and mitigation measures in Section 4.12.3 and Appendix P.

**LAMP-AL00002-12**

**Comment:** The traffic analysis underestimates both traffic volume and the negative impacts on the community. The analysis optimistically relies on "pricing strategies" to divert congestion and offers programs such as the LAX TDM/TMA that have no measure of success. These programs must have performance metrics included in order to determine the traffic reduction forecasts.

**Response:** The Draft EIR did not underestimate traffic volume or underestimate negative traffic impacts. Section 4.12.2 and Appendix O of the Draft EIR include detailed traffic analyses of operating conditions at 183 study intersections and 23 freeway segments in both phases for both horizon years 2024 and 2035, including growth associated with 86 Million Annual Passengers (MAP) in 2024 and 95 MAP in 2035 at LAX, as well as regional land use, socio-economic and demographic growth projections provided in SCAG's 2012 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS). The socio-economic and demographic growth projections were refined further to include related (background) projects growth, which was incorporated as part of the traffic study for the proposed project.

The Traffic Study's scope, assumptions, parameters and methodology were coordinated with Caltrans, City of Los Angeles, Metro, SCAG, County of Los Angeles, City of Inglewood, City of Culver City, City of El Segundo and LAWA at the commencement of the Study. As described on pages 4.12-72 to 4.12-74 and page 4.12-178 of the Draft EIR, a state-of-the-art travel demand forecasting model, based on the SCAG Regional Transportation Plan (RTP) 2012 Transportation Model and the City of Los Angeles' Westside Mobility Plan model was prepared and traffic forecasts for 2024 and 2035 conditions with and without the proposed Project were developed. The SCAG and Westside Mobility Plan models include regional growth projections, including housing and employment data, based on Los Angeles Department of Transportation (LADOT) and SCAG growth projections for future horizon years (2024 and 2035). The model was refined to include network and Traffic Analysis Zone (TAZ) enhancements to include more refined roadway and land use systems in the Study Area. In addition, the model was updated to incorporate traffic data from 212 probable development projects in surrounding jurisdictions (see Table 3-2 in Chapter 3, Overview of Project Setting*).* Therefore, the model includes background traffic volumes due to ambient area-wide growth for future horizon years, as well as changes in the transportation network (i.e., roads and intersections) during the same period. Utilizing the calibrated model, the future 2024 and 2035 conditions were forecast in a manner consistent with the SCAG's RTP and the City of Los Angeles Westside Mobility Plan Models.

Section 4.12.2 and Appendix O of the Draft EIR include detailed traffic analyses of operating conditions at 183 study intersections and 23 freeway segments in both phases for both horizon years 2024 and 2035, including growth associated with 86 Million Annual Passengers (MAP) in 2024 and 95 MAP in 2035 at LAX, as well as regional land use, socio-economic and demographic growth projections provided in SCAG's 2012 RTP/ Sustainable Communities Strategies (SCS). The socio-economic and demographic growth projections were refined further to include related (background) projects growth, which was incorporated as part of the traffic study for the proposed Project. Traffic impacts were evaluated using significance criteria adopted by the various

jurisdictions (see Section 4.12.2.4.1 of the Draft EIR), and where required, mitigation measures were identified and recommended (see Section 4.12.2.9 of the Draft EIR). All these measures were coordinated with the affected jurisdictions.

Importantly, while the project description states that operating system changes including potential pricing strategies and other issues would be considered, the traffic analysis conducted for the Project did not assume pricing strategies would be implemented to divert congestion from the CTA.

The commentor's statement on Travel Demand Management (TDM)/Transportation Management Association (TMA) references one of the proposed mitigation measures for the proposed Project (Mitigation Measure MM-ST (LAMP)-6. Transportation Demand Management (TDM) Program); details relative to the TDM Program and its effects in reducing 5 percent of the employee trips during the peak hours are provided in the Section 4.12.2.9.1 of the Draft EIR. New TDM/TMA measures were not included in the proposed Project description and were not assumed for the proposed Project traffic impact analysis.

**LAMP-AL00002-13**

**Comment:** The traffic study assumptions/forecasts for 2024 need to be verified after Phase 1 has been in operation for one year. Any inconsistencies with this DEIR Transportation Model forecast must be rectified prior to any Phase 2 approvals.

**Response:** The Traffic Study's scope, assumptions, parameters and methodology were coordinated with Caltrans, City of Los Angeles, Metro, SCAG, County of Los Angeles, City of Inglewood, City of Culver City, City of El Segundo and LAWA at the commencement of the Study. As described on pages 4.12-72 to 4.12-74 and page 4.12-178 of the Draft EIR, a state-of-the-art travel demand forecasting model, based on the SCAG Regional Transportation Plan (RTP) 2012 Transportation Model and the City of Los Angeles' Westside Mobility Plan model was prepared and traffic forecasts for 2024 and 2035 conditions with and without the proposed Project were developed. The SCAG and Westside Mobility Plan models include regional growth projections, including housing and employment data, based on LADOT and SCAG growth projections for future horizon years (2024 and 2035). The model was refined to include network and Traffic Analysis Zone (TAZ) enhancements to include more refined roadway and land use systems in the Study Area. In addition, the model was updated to incorporate traffic data from 212 probable development projects in surrounding jurisdictions (see Table 3-2 in Chapter 3, Overview of Project Setting*)*. Therefore, the model includes background traffic volumes due to ambient area-wide growth for future horizon years, as well as changes in the transportation network (i.e., roads and intersections) during the same period. Utilizing the calibrated model, the future 2024 and 2035 conditions were forecast in a manner consistent with the SCAG's RTP and the City of Los Angeles Westside Mobility Plan Models.

These forecasts were updated using actual traffic count data and methods prescribed in the National Cooperative Highway Research Program (NCHRP) 255 Report – Highway Traffic Data for Urbanized Area Project Planning and Design, and were utilized in the development of traffic forecasts at study area intersections, as described in on page 4.12.74 of the Draft EIR and Appendix O, Off-Airport Traffic Study Appendices (PDF pages 644 and 646 in Appendix D, Updated Model Development, Date Flow Process and Model Application, of Appendix O PDF), of the Draft EIR.

Detailed validation checks were performed to ensure that the model provided consistent and reliable travel forecasts and these forecasts were coordinated with all the affected jurisdictions, and traffic analyses were performed utilizing methodologies and software acceptable to all these

jurisdictions – CalcADB for City of Los Angeles, Intersection Capacity Utilization (ICU) for all other cities and County, and Highway Capacity Manual 2010 for Caltrans (see Section 4.12.2.2.2 and pages 646 and 647 in Appendix D, Updated Model Development, Date Flow Process and Model Application, of Appendix O PDF), of the Draft EIR).

Please note that this comment does not raise a specific concern regarding the accuracy of the Draft EIR's traffic impact analyses. Phase 2 includes potential future related development, whose impacts are evaluated at a programmatic level in the Draft EIR. As stated on page 2-188 of the Draft EIR, when individual development projects are proposed for these parcels, additional CEQA project-level review, including project-level traffic impact analyses, would be conducted, as necessary. Furthermore, CEQA does not typically require the type of interim analysis requested by the commentor. (See *City of Irvine v. County of Orange* (2015) 238 Cal.App.4th 526.) In addition, the mitigation measures proposed will be subject to a mitigation monitoring and reporting program. (CEQA Guidelines Section 15097.) The mitigation measures, such as MM-ST (LAMP)-1, include ongoing monitoring efforts for traffic conditions. Intersections in the area are also subject to monitoring pursuant to the County Congestion Management Program (CMP). (See https://www.metro.net/projects/congestion_mgmt_pgm/.)

**LAMP-AL00002-14**

**Comment:** A regional, all-inclusive transportation plan, including freeway improvements, intersection improvements and mass transit additions, is needed to ensure transportation success of this project. If one area is not addressed/implemented the entire proposed solution to decrease congestion is jeopardized. Funding mandates from LAWA, various cities and state agencies, including Cal Trans, must be required.

**Response:** The Los Angeles Department of City Planning is responsible for preparing the Mobility Element of the City's General Plan, which also covers the LAX region. The plan was last amended in 2016, adopted by the Los Angeles City Council on September 7, 2016. The purpose of this plan is to guide the further development of a citywide transportation system which provides for the efficient movement of people and goods. Freeway improvements are the responsibility of Caltrans; they work with local jurisdictions to identify freeway improvement projects, funding needs, and prioritization of projects. This information is provided to SCAG, the designated Metropolitan Planning Organization (MPO), which is mandated by the federal government to develop a multimodal long-range transportation plan that provides a 20-year vision and financial strategy for investing in our transportation system, and to update that plan at least once every four years. SCAG's plan, the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), addresses all modes of our transportation system: active transportation, aviation and airport ground access, corridor planning, goods movement, high-speed rail, intelligent transportation systems, safety and security, transit, and transportation finance. The Final 2016-2040 RTP/SCS[1] was adopted earlier this year on April 7, 2016.

At the commencement of the EIR's Traffic Study, LAWA met with a Technical Advisory Committee consisting of transportation engineering and planning representatives from Caltrans, SCAG, LADOT, and Metro to present the assumptions, parameters and methodology associated with the Traffic Study for the proposed Project.[1] Also, please see Responses to Comment Letter LAMP-AS00002 (comments submitted by Caltrans). LAWA coordinated with and provided details of the elements of the proposed Project to SCAG, during the development of the 2016-2040 RTP/SCS. As such, the LAX Landside Access Modernization Program, freeway, local and other improvements in the study area have been included in SCAG's 2016-2040 RTP/SCS.

[1] Southern California Association of Governments, Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility,

Accessibility, Sustainability and a High Quality of Life, Adopted April 7, 2016, Available: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx

**LAMP-AL00002-15**

**Comment:** The DEIR does not address the years of neighborhood impacts resulting from reduced passenger parking at the Central Terminal Area during demolition and construction, which will increase parking and ride-sharing pick-ups.

**Response:** Section 2.6.1 in Chapter 2, Description of the Proposed Project, of the Draft EIR discusses the construction phasing of the proposed Project. Table 2-15 on page 2-179 in Chapter 2 provides an illustration of the anticipated phasing of the project. Specifically, Table 2-15 shows that construction of the western public parking garage and curb associated with the Intermodal Transportation Facility (ITF) West would be initiated in the first quarter of 2018 and completed by the first quarter of 2020. The first parking lot to be impacted in the Central Terminal Area (CTA) would be Parking Garage P2B, which is scheduled for demolition and reconstruction between the fourth quarter of 2019 and the third quarter of 2021. LAWA would try and keep this garage open and available for passenger parking until the western half of the ITF West parking garage is open and available for parking. Similarly, as shown on Table 2-15, the other affected parking garages within the CTA would remain open and available until Parking Garage P2B was re-opened; at that time, Parking Garage P2A would be demolished and reconstructed. Once Parking Garage P2A is re-opened, Parking Garage P5 would be demolished and reconstructed.

Thus, LAWA will strive to keep open at least the number of existing public parking spaces that exists today; the number of available public parking spaces would increase once the western half of the ITF West parking garage is opened in early 2020 (see Table 2-10 in Chapter 2, Description of the Proposed Project, of the Draft EIR). In addition, it is unlikely that construction of the proposed Project would result in increased parking in area neighborhoods or ride-share pickups. Parking at the ITF West would most likely be more economical than the public parking garages within the CTA as LAWA would implement differential pricing and other strategies to encourage passengers, meet-and-greeters, and well-wishers to utilize the ITF West to access the Airport instead of driving into the CTA (see Section 2.4.6.2.1 of the Draft EIR). Thus, the ITF West should attract more parkers to this facility.

**LAMP-AL00002-16**

**Comment:** DEIR assumptions related to projected passenger counts and total operations in 2035 are inconsistent with historical data. The forecast for 2035 has Million Annual Passengers (MAP) at 96 to total operations (in 000's) at 850, which is a ratio of .113. The ratio in 2015 was .127, and a ratio of .113 is only found by looking back to 2010/2011. This indicates that the MAP is understated by more than 12%.

**Response:** It appears that the commentor is referencing the results of the analysis of the ratio of million annual passengers (MAP) per 100,000 operations developed by another commentor, the Alliance for a Regional Solution to Airport Congestion (ARSAC). See Response to Comment LAMP-PC00032-16, which demonstrates that the ratio calculated by ARSAC for 2035 is incorrect. The MAP level used in the Draft EIR analyses, as discussed in the Introduction to Chapter 4, Environmental Impact Analysis, is correct.

**LAMP-AL00002-17**

**Comment:** While construction haul routes have been identified, no mention is made of the commuter routes for all other construction related traffic. All construction related traffic routes must be specified.

**Response:** As stated in Section 4.12.3.2.3 of the Draft EIR, the Draft EIR's construction traffic analyses include estimated construction employee commuter routes. The construction employee trip distribution patterns were based on regional patterns developed for the proposed Project and previous LAWA construction traffic studies, specific haul route information, airline passenger survey information, and regional population distributions. Additionally, detailed information regarding construction-related traffic distribution patterns is presented in Appendix P of the Draft EIR (section on construction vehicle haul routes and distributions beginning on page 148 of the pdf), which includes the assumed routes for both employee and haul truck trips.

**LAMP-AL00002-18**

**Comment:** Further, LAWA should develop a robust communications plan for the next 10 years that incorporates social media, email, outreach and print, to keep the area stakeholders apprised of construction impacts (noise, late night work, road closures, haul route activity).

**Response:** As indicated on pages 4.12-238 through 4.12-240 in Section 4.12.3, Construction Surface Transportation, of the LAX Landside Access Modernization Program EIR, LAWA as part of Mitigation Measure MM-ST (LAMP)-1, as revised in Chapter 3, Corrections and Additions to the Draft EIR, would establish a Project Task Force specific to the LAX Landside Access Modernization Program that may be comprised of key stakeholders from LAWA, the Coordination and Logistic Management Team (CALM), other City departments, and others as deemed appropriate. This Project Task Force would provide input into worksite traffic control plans and other traffic management plans that are developed for the Project. The Project Task Force would review the traffic management plans to ensure the following topics are considered:

- Coordination with all other LAWA construction projects;
- Coordination with other public infrastructure projects;
- Detour impact analysis for pedestrian, business, bicycle, and traffic flow;
- Coordinate closures and restricted access with all potential special events and holiday traffic flow;
- Notification to the public with use of static signage, changeable message signs, media announcements, Airport website, etc.;
- Work with LAWA police and the Los Angeles Police Department to enforce delivery times and routes;
- Coordinate with police and fire personnel regarding maintenance of emergency access and response times;
- Monitor and coordinate deliveries;
- Establish detour routes;
- Work with residential and commercial neighbors regarding upcoming construction activities; and
- Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

The Project Task Force would collaborate with the appropriate groups to develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction. The Task Force would work closely with other LAWA departments, including Public Relations, Planning and Development, and Operations. The Task Force would also ensure that an innovative and effective construction outreach and

communication strategy is developed to keep key stakeholders, businesses, and residents notified and informed during construction of the proposed Project, which is planned to occur between the end of 2017 and 2030.

**LAMP-AL00002-19**

**Comment:** The comments described above certainly do not represent a complete list, but are demonstrative of the fact that there are many issues related to the proposed project that were not adequately addressed in the Draft EIR.

**Response:** The comment does not raise any specific additional environmental concerns that it alleges were not adequately addressed in the Draft EIR. Please see Responses to Comments LAMP-AL00002-2 through LAMP-AL00002-18 above regarding the adequacy of the analysis in the LAX Landside Access Modernization Program Draft EIR.

**LAMP-AL00002-20**

**Comment:** Moreover, Lawndale requests that the public be granted more than the minimum comment period of forty-five (45) days. The LAMP is a very significant series of projects with massive impacts for the future of the region surrounding LAX and our community. Forty-five days is insufficient time for the public to review and comment upon a project of this magnitude and long-term planning process. Lawndale respectfully suggests the comment period should be extended another forty-five (45) days for a totally public comment period of ninety (90) days. To the extent comments are submitted by other agencies or interested persons, Lawndale reserves the right to incorporate and adopt such comments as its own.

**Response:** LAWA provided a 60-day review period for the LAX Landside Access Modernization Program Draft EIR. Section 21091(a) of the Public Resources Code requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. (See also State CEQA Guidelines Section 15105.) The review period for the LAX Landside Access Modernization Program Draft EIR provided an additional 15 days for public comment beyond the requirements of CEQA.

**LAMP-AL00002-21**

**Comment:** The members of the Lawndale City Council would like to make it clear that the City has significant concerns about the proposed project, as it is presented in the Draft EIR. Furthermore, we encourage LAWA to work with Lawndale, as well as the communities adjacent to the project site, to arrive at a solution that is a benefit, rather than a burden, to the surrounding area as a whole.

**Response:** Please see Responses to Comments LAMP-AL00002-1 through LAMP-AL00002-20 above regarding the issues the City of Lawndale raised on the Draft EIR. Additionally, it should be noted that over the past two years LAWA has conducted over 120 Project-related public outreach meetings with key stakeholders, agencies, and community groups. The City of Lawndale was included in notifications related to the LAX Landside Access Modernization Program for two elected officials' briefings (Wednesday, May 27, 2015 and Thursday, February 11, 2016) as well as invitations to the public workshops/meetings. Further, Mayor Robert Pullen-Miles was invited to attend the Community Based Research Study, funded by LAWA as part of the LAX Landside Access Modernization Program, an informational meeting held on Wednesday, October 14, 2015, which he attended.

**LAMP-AL00003 Durbin, Bruce County of Los Angeles Airport Land Use Commission 11/1/2016**

**LAMP-AL00003-1**

**Comment:** Thank you for the opportunity to comment on the Notice of Availability (NOA) of a Draft Environmental Impact Report for the Landside Access Modernization Program at Los Angeles International Airport (LAX) Plan, which include amendments to LAX Specific Plan, LAX Plan, Westchester-Playa Community Plan, and City of Los Angeles General Plan. Staff of the Los Angeles County Airport Land Use Commission (ALUC) has reviewed the NOA documents and has the following comments:

- In December 1991, the Los Angeles County Regional Planning Commission in its capacity as the ALUC adopted the Airport Land Use Plan (ALUP) for the county's fifteen public use airports. For each airport the ALUC adopted planning boundaries, also known as the airport influence area (AlA), within which certain proposed local actions must be submitted to the ALUC for review. Staff has determined that the subject property is located within the AlA for LAX.
- The proposed project is an amendment to the LAX Plan and LAX Specific Plan and amendments to the General Plan for the City of Los Angeles. Pursuant to Public Utilities Code Section 21676(b), amendments to General and Specific Plans are land use actions which require ALUC review as listed in Sections 1.5.1 and 1.5.2 of the ALUC Review Procedures and therefore requires review by the ALUC for an Airport Land Use Plan consistency determination.
- The types of potential airport impacts which the ALUC considers are:
  1) Exposure to aircraft noise in areas within the AlA;
  2) Land use safety - the risks, both to people on the ground and the occupants of aircraft, associated with aircraft accidents near airports;
  3) Protection of airport airspace from hazards to flight, including smoke, light and glare; and
  4) General concerns, especially with annoyance, related to aircraft overflights.
- The relevant sections of the Draft EIR which the ALUC will review for this project are Aesthetics (Light and Glare), Land Use & Planning, Noise, and Hazards/Hazardous Materials. The ALUC is not concerned with all other matters addressed in the DEIR, including air quality, traffic circulation and public services.

The timing of submission of materials for review by the ALUC should be after the Board of Airport Commissioners and L.A. Planning Commission have taken preliminary action, but before the City Council considers the project for final approval. All project information should be filed with the Department of Regional Planning.

If you have any questions regarding this matter, please contact Bruce Durbin at (213) 974-6432 or via email at aluc@planning.lacounty.gov, between 7:30 am and 5:30 PM, Monday through Thursday. Our office is closed on Fridays.

**Response:** Page 2-219 in Chapter 2, Description of the Proposed Project, of the Draft EIR identifies that the proposed Project will require review by the County of Los Angeles Airport Land Use Commission (ALUC) to determine whether the Project is consistent with the County's Airport Land Use Plan. Additionally, Section 4.8.3.1.2 of the Draft EIR discusses the Airport Land Use Plan and pages

4.8-42 and 4.8-43 in Section 4.8.5.1.2 of the Draft EIR discuss the proposed Project's consistency with the Airport Land Use Plan.

LAWA thanks the staff of ALUC for meeting with LAWA during the preparation of the Draft EIR. LAWA will continue its coordination efforts with the ALUC staff to determine the timing for submission of materials and will also setup a pre-application meeting to review the planned submittals in anticipation of ALUC review.

## LAMP-AL00004 Hall, Thomas L. LA Community College District 11/15/2016

**LAMP-AL00004-1**

**Comment:** Ms. Quintanilla: On behalf of the Los Angeles Community College District ("District") and West Los Angeles College ("WLAC"), thank you for the opportunity to provide comments on the Draft Environmental Impact Report ("DEIR") for Los Angeles International Airport ("LAX") Landside Access Modernization Program ("Project"). As you know, the District owns approximately 4.82 acres of land located at 9700 S. Sepulveda Boulevard ("Property" or "Site"). The Property lies on the north side of 98th Street, and runs from Sepulveda Boulevard to Vicksburg Avenue. The Property is adjacent to the land owned by Wally Park, which lies on the south side of 96th and also runs from Sepulveda Boulevard to Vicksburg Avenue ("Adjacent Property"). The Property is improved with two airplane hangars that WLAC currently uses for the warehousing of movie set props and for instruction to support its Film/Television Production Crafts program. The type of instructional services provided at the Property cannot be duplicated at other District-owned facilities and as such is integral to the program's educational purposes. The remaining portion of the Property is generating revenue for WLAC via a surface parking ground-lease and providing District headquarters with parking downtown in exchange for parking at the Site. We have the following general comments: During the NOP comment stage, the Project drawings depicted the construction of an underpass, underneath the Property, from southbound Sepulveda Boulevard. The DEIR Project drawings, no longer depict the tunnel, the Project now anticipates acquiring the Adjacent Property and constructing a new at-grade roadway having its inception north bound on Sepulveda between 98th and 96th Street ("New Roadway"), cutting through a portion of the District Property and running the length of the Adjacent Property. The New Roadway appears to curve at New "A" Street and lead to the ITF West and CTA. Two main issues are of serious concern. One: The New Road will be constructed partially on District Property impacting the District's ability to use the Site in the future, academically, as a revenue generator and with the existing arrangement for District parking Downtown. It is unclear what at grade improvements will be required on the Property and adjacent streets to support the New Road on the Site. We need more detail to understand whether the New Road will be covered, retaining or sound walls constructed, set-backs required, and if changes on Sepulveda will relocate the ingress and egress to and from the Property to truly understand the practical implications of the Project during construction and operation. Additional detail will make clear whether the Project will have the effect of isolating the Site or making access to the Site extremely challenging that drivers simply decide to park elsewhere or deters students from attending class. The numerous road closures, new street configurations and construction of new streets will all impact access to the Site. Construction of the New Roadway without taking/using a portion of the District Property should be strongly considered and analyzed. DEIR indicates 96th Street between Sepulveda and Vicksburg will be significantly improved and Vicksburg demolished. Perhaps the widening 96th Street may wholly encompass the New Roadway. Constructing the New Roadway further north entirely on the Adjacent Property is also an option.

**Response:** The commentor's statements refer to the proposed Project Phase 2 elements including the northbound Sepulveda Boulevard access to 96th Street to New "A" Street. Access to the WLAC property is currently off of 96th Street, 98th Street and Sepulveda Boulevard northbound roadway (right-in and out only). Access to the WLAC property would remain unchanged during Phase 1 of the proposed Project. With the proposed Project Phase 2 components, access to the WLAC property would continue to be off of 98th Street (both east and west); access to the adjacent lot would be provided off of 98th Street and Vicksburg Avenue.

Specifics relative to access and circulation associated with the WLAC property would be coordinated at the time of final design when details relative to exact alignment, etc., would be available. LAWA would seek design solutions that would not result in having the effect of isolating the WLAC property nor make access to the WLAC property more challenging. Detailed coordination with landowners relative to site access and circulation considerations, both during construction and post-construction, would be conducted at the time of final design of the new roadways and facilities. LAWA would also look at ways to avoid acquisition of the WLAC property during the design process. If any acquisition is required, fair market value compensation would be provided, ensuring no loss to educational funding or operations. This information has been added to the Project Description and is reflected in Chapter 3, Corrections and Additions to the Draft EIR.

As noted in Section 2.5.23 in Chapter 2, Description of the Proposed Project, the proposed roadway improvement would require the construction of new driveways, curb cuts, and ramps. These improvements would require easements or property acquisition. LAWA would utilize easement and partial takes to the extent feasible, to minimize any acquisition required.

**LAMP-AL00004-2**

**Comment:** Secondly, the DEIR does not recognize the Property as an educational facility. It is identified as a purely commercially used Site. As explained above, the Site is an integral part to the WLAC Film/Television Production Crafts Program and labs are held on Site. The DEIR fails to analyze the impacts of the Project and New Road on sensitive users a few feet away and adjacent to some of the other components of the Project. Additionally, expanding the academic component to the entire Site is an option available to the District today. We also need more clarity as it relates to other Entitlements that are being requested. The Property is uniquely positioned and the District derives great benefits from its current uses as both a commercial and an educational site. What are the General Plan Amendments, Specific Plan Amendments and Zone changes being sought? Would they prohibit or limit the current uses and future uses on Site? We request that the FEIR recognize the Property also as an academic use, in order for the correct impacts to be determined and the correct mitigation measures be recommended.

**Response:** The Draft EIR identifies the potential environmental effects of the proposed Project, including the "New Road" proposed along the south side of 96th Street on all uses located in the vicinity of the Project. The commentor is correct that the Draft EIR did not identify the WLAC property as containing sensitive uses, since it does not have students there on a regular basis. Section 4.8.3.2, Existing Land Use Setting, on page 4.8-29 of the Draft EIR is revised as follows (italicized and underlined text indicates new language added to the Draft EIR):

> "As described in Section 4.8.2, *Methodology*, above, the Project area is encompassed within the North Study Area and the South Study Area. The North Study Area (see Figure 4.8-1) includes airport areas owned and controlled by LAWA and proposed acquisition areas that are subject to improvements under the proposed Project. The existing uses in this area include airport and airport support, including the CTA and airport parking areas, and residential, commercial, and light industrial uses. Similarly,

surrounding uses includes airport and airport support, residential, commercial, *educational (i.e., property at northeast corner of Sepulveda Boulevard and 96th Street, which contains two former airplane hangars which West Los Angeles College reports it currently uses for the warehousing of movie set props and for instruction to support its Film/Television Production Crafts certificate program),* and light industrial uses. The South Study Area (Figure 4.8-2), formerly vacant, is currently used as a construction staging area for ongoing development projects at LAX. Surrounding uses include LAX support facilities, a restaurant, and Imperial Highway and the 105 Freeway. The following describes existing land uses where each of the main components of the Project is proposed."

The above revision is included in Chapter 3, Corrections and Additions to the Draft EIR.

As noted by the commentor, the subject property is adjacent to the lot owned and operated by Wally Park, which is used for vehicle parking. As indicated above in Response to Comment LAMP-AL00004-1, only the Wally Park parcel is proposed for acquisition, and not the property of concern to the commentor. The proposed Project would not change the existing Commercial C2-2 zoning that applies to the WLAC parcel. The proposed General Plan Amendment, Specific Plan Amendments, and Zone Changes associated with the proposed Project are all described and shown in Section 2.8, Entitlements, of the Draft EIR, and Appendices C and D of the Draft EIR indicate how the LAX Plan (i.e., General Plan) and the LAX Specific Plan (Zoning), respectively, would be modified under the proposed Project.

None of those entitlement actions would modify or expand existing uses on the WLAC parcel to the extent allowed under the current C2-2 zoning and/or other applicable land use regulations. Additionally, as further described in the responses below, implementation of the proposed Project would not significantly change the existing environment in which WLAC reports the current warehousing and instructional activities occur. As further described in the responses below, recognition of the subject property as used for educational as well as commercial uses does not result in any new or substantially more severe significant environmental impacts compared to those disclosed in the Draft EIR, or require the development of any additional mitigation measures.

**LAMP-AL00004-3**

**Comment:** Air Quality Figure 4.2.2-1 identifies the Property as a commercial site only. As mentioned above, the Property is being used for instructional purposes and a corresponding air quality analysis should be made. Instruction at times is provided outdoors and the decrease in air quality due to the New Roadway (construction and operation) just a few feet away should be analyzed considering this use. Among other impacts, the exhaust from the vehicles travelling on the New Roadway to the CTA and dust particles in the area will likely increase having a health impact on the students. The DEIR states that with appropriate mitigation most of the impacts are reduced to a level that is less than significant, and there are a few significant and unavoidable impacts with mitigation. However, the DEIR did not recognize the Property as an academic use to arrive at the conclusion. We request that the FEIR recognizes the Property as an academic use, in order for the correct impacts to be determined and the correct mitigation measures to be in place.

**Response:** As indicated above in Response to Comment LAMP-AL0004-1, the "New Roadway" proposed along the south side of 96th Street would not extend into the WLAC property and, as can be determined from Figure 2-41 in the Draft EIR, the new roadway is north of the subject property, approximately 200 feet away at its closest point. Additionally, as also reflected in Figure 2-41 in the Draft EIR, implementation of the proposed Project would include the cul-de–sacking of Vicksburg Avenue, which would remove traffic along the eastern boundary of the WLAC property.

The air quality and human health risk impacts of the proposed Project were analyzed on or near the WLAC property for both construction and operational activities. The analyses are summarized in Section 4.2.1, Air Quality, and Section 4.2.2, Human Health Risk Assessment, of the Draft EIR. Detailed information in inputs, assumptions, and results are included in Appendix F, Air Quality, Greenhouse Gas Emissions, and Human Health Risk Assessment, of the Draft EIR.

The air quality dispersion analysis includes impacts from construction activities. The roadways near the WLAC property that were evaluated in the air quality impact analysis included West 96th Street, West 98th Street, Sepulveda Boulevard, Century Boulevard, Vicksburg Avenue, New "A" Street, New "B" Street, and the new and existing ramps connecting the LAX Central Terminal Area to Sepulveda Boulevard and Century Boulevard. The peak unmitigated air pollutant concentrations for construction are summarized in Table 4.2.1-8 on page 4.2-35 of the Draft EIR, and peak mitigated concentrations for construction are summarized in Table 4.2.1-27 on page 4.2-60 of the Draft EIR. It is important to note that none of these peak values occur at or near the WLAC property, given that the vast majority of Project-related construction activities would occur east of, and well-removed from, the WLAC property. Similarly, most of the Project-related traffic would occur along roadways that are not near the subject property. As such, the air quality impacts at the WLAC property would be less than those identified in the Draft EIR. It is also important to note that the air quality mitigation measures for construction and operations that are presented in Section 4.2.1.7 of the Draft EIR apply to the Project overall, which would include those aspects of the Project that occur in the vicinity of the WLAC property.

**LAMP-AL00004-4**

**Comment:** In addition, dust particles may create additional maintenance costs for the District facility, this should be analyzed and the impacts mitigated. As it relates to the parking use, the construction and operation of the New Road will impact the amount of dust and debris accumulated on the vehicles, which may then deter potential drivers from parking on the Property. Appropriate dust mitigations should be implemented.

**Response:** The air quality and human health risk impacts of the proposed Project, including those from road and construction dust, were analyzed on or near the WLAC site in question for both construction and operational activities. The analyses are summarized in Section 4.2.1, Air Quality, and Section 4.2.2, Human Health Risk Assessment, of the Draft EIR. Detailed information in inputs, assumptions, and results are included in Appendix F, Air Quality, Greenhouse Gas Emissions, and Human Health Risk Assessment, of the Draft EIR.

The air quality dispersion analysis includes emissions from construction dust and road dust. The roadways near the WLAC site that were evaluated in the air quality impact analysis included West 96th Street, West 98th Street, Sepulveda Boulevard, Century Boulevard, Vicksburg Avenue, New "A" Street, New "B" Street, and the new and existing ramps connecting the LAX Central Terminal Area to Sepulveda Boulevard and Century Boulevard. The peak unmitigated $PM_{10}$ and $PM_{2.5}$ concentrations for construction are summarized in Table 4.2.1-8 on page 4.2-35 of the Draft EIR, and peak mitigated $PM_{10}$ and $PM_{2.5}$ concentrations for construction are summarized in Table 4.2.1-27 on page 4.2-60 of the Draft EIR. Note that these peak values do not fall in the WLAC site; thus the WLAC site concentrations would be lower.

With regard to mitigation, as discussed on pages 4.2-7, 4.2-9, 4.2-23, and 4.2-33 in Section 4.2.1, Air Quality, of the Draft EIR, the proposed Project would comply with South Coast Air Quality Management District Rule 403, Fugitive Dust, to control construction generated dust emissions. In addition, mitigation measures for the LAX Landside Access Modernization Program Project are listed in Section 4.2.1.7, Tables 4.2.1-23 (construction-related air quality control measures), 4.2.1-

24 (transportation-related air quality control measures), and 4.2.1-25 (operations-related air quality control measures), on pages 4.2-54, 4.2-57, and 4.2-58, respectively, of the Draft EIR. Implementation of these measures and compliance with SCAQMD Rule 403 are effective approaches to reducing project-related dust emissions. The possible need for additional maintenance at the District facility, and the possibility that potential drivers may be deterred from parking at the District's property are not environmental impacts for which CEQA requires mitigation. (See *City of Hayward v. Bd. of Trustees of the Cal. State University* (2015) 242 Cal.App.4th 833, 843 [additional need for fire protection services not an environmental impact that CEQA requires a project proponent to mitigate].) Additionally, there is no evidence that the commentor's concerns regarding maintenance costs and parking would occur, and to assume they would and mitigate accordingly would be speculative.

**LAMP-AL00004-5**

**Comment:** Hazards and Hazardous Materials Allied Aviation Services Co. and Park One/Honeywell International, both across the street from the Property, are listed in the Hazardous Material Sites of Concern in Table 4.6.1-1 of the DEIR. The DEIR states that with appropriate mitigation the impacts are reduced to a level that is less than significant. However, the DEIR did not recognize the Property as an academic use to arrive at the conclusion. In the FEIR the Property should be recognized as an academic use, in order for the correct: 1) mitigation measures to be in place; and 2) procedures to be set in place should there be a release and exposure to the students. LAWA should consider appropriate mitigation measures during the excavation, improvement, demolition and construction of the New Road, Sepulveda, 96th Street, 98th Street, Vicksburg and other surrounding streets given the proximity to the Property and the exposure to students. Trucks transporting hazardous materials on the New Road should take appropriate mitigation measures to reduce dangers associated with hazardous materials to students on Site and parking customers.

**Response:** As indicated on pages 4.6-21 and 4.6-22 of the Draft EIR, any contaminated soils or groundwater encountered during construction, including the potential to encounter such materials at the Allied Aviation Services Company site or the Park One/Honeywell International Site, would be subject to the requirements of the applicable regulations described in Section 4.6.1.3 of the Draft EIR. Those requirements would apply to the excavation, handling, storage, transport, and disposal of such materials, and serve to be protective of human health and safety for the general public, including, but not limited to, adult students attending the two-days-per-week, eight week course at the WLAC facility.[1] Hazards and hazardous materials impacts on academic users of the WLAC facility would therefore be less than significant.

[1] West Los Angeles College, Course: Film Production 110-Set Dressing Crafts, as indicated at http:webapps.wlac.edu. Last accessed on December 8, 2016.

**LAMP-AL00004-6**

**Comment:** Hydrology and Water Quality The Project should analyze to determine if there will be a change in the drainage pattern on the Property, that may result in flooding and damage to the hangars on the Site as well as to the movie props inside. Page 38 of Appendix L of the DEIR states that the existing drainage pattern is East and South, however, the drainage pattern is not analyzed on the Property itself after the New Road is constructed. It is unclear if the drainage pattern is altered due to the construction of the New Road and its related improvements. In addition, it is unclear if the storm-water capture beneath the ConRAC facility would be effective in mitigating any run-off from the Property. While the other project facilities have not proposed detention measures, detention resulting from the New Road should be considered, especially since the hangars will remain on Site.

**Response:** Detailed design engineering plans for the subject roadway improvement, including drainage plans, have not yet been developed. Given that all the area where the roadway project would occur is currently completely paved, no increase in surface water runoff, which could create or exacerbate a flooding problem, would occur. Moreover, redevelopment of existing paved areas within the northern portion of the Wally Park property with the new roadway would be subject to the requirements of the City of Los Angeles Low Impact Development (LID) Ordinance and Standard Urban Stormwater Mitigation Plan (SUSMP), which place an emphasis on stormwater infiltration, retention/detention, and controlling peak stormwater discharge rates (see pages 4.7-4 through 4.7-6 and 4.7-37 of the Draft EIR). Such requirements would reduce the potential for flooding compared to existing conditions.

Based on a review of topographical elevations on the Wally Park property, where the new roadway would be constructed, the existing direction of drainage for the subject area is generally towards the north, where there is an existing storm drain line along W. 96th Street. Drainage from the new roadway would likely maintain the existing drainage direction, towards the north. Drainage associated with the proposed roadways will be determined in accordance with City standards during the design process.

Additionally, Mitigation Measure MM-HWA (LAMP)-1, Stormwater Management Facilities (Project-Specific), in Section 4.7.7 of the Draft EIR identifies the storage volume requirements for on-site stormwater management to meet water quality treatment requirements as well as additional on-site runoff storage/detention that would be needed to fully mitigation peak runoff depth downstream for the 10-year storm event. Table 4.7-9 in Section 4.7.7 of the Draft EIR identifies requirements for the CONRAC, ITF West, and the new roadways, which will be incorporated into the design of those facilities (among others).

Based on the above discussion, implementation of the proposed Project would not create a flooding hazard at the WLAC property, and hydrology impacts on the property would be less than significant.

**LAMP-AL00004-7**

**Comment:** Noise & Vibration The DEIR does not recognize the Property as one with an academic use. Page 13 of Appendix M states that “sensitive land-uses and establishments situated close to future construction zones were identified in the screening survey,” however the Property was not identified as an academic use, accordingly the impacts to the District students were not analyzed. The FEIR should recognize the Property as an academic use, in order for the correct impacts to be determined and the correct mitigation measures be recommended during construction (construction and equipment noise) and during operation. In this vein, our comments below relate to a few intersections that omitted the specific analysis of the Property with the New Road and the academic use:

**Response:** Recognition of the subject property as used for educational as well as commercial uses does not result in any new or substantially more severe significant environmental impacts compared to those disclosed in the Draft EIR, or require the development of any additional mitigation measures. The property where WLAC stores movie set props and elects to hold adult classes two days a week in movie set dressing crafts has an existing Community Noise Equivalent Noise Level (CNEL) estimated to be around 76.3 dB(A), based on the nearest location where ambient noise level measurements were taken; specifically, the Concourse Hotel (at Sepulveda Boulevard and Century Boulevard) as indicated in Table 4.9.3-3 of the Draft EIR, as revised in Chapter 3, Corrections and Additions to the Draft EIR. The existing ambient noise level in that general area is largely influenced by the proximity to both the north airfield complex and the south airfield complex at LAX, as well as by existing traffic volumes on Sepulveda Boulevard. Implementation

of the proposed Project would not affect aircraft operations at LAX. As reflected in the Draft EIR tables that delineate the Project-related changes in roadway noise levels for the years 2015, 2024, and 2035, specifically Tables 4.9.2-4, 4.9.2-6, and 4.9.2-7, respectively, implementation of the proposed project would result is a slight reduction (i.e., 0.2 to 0.4 dB(A) reduction) in roadway noise levels on the roadway segment nearest to the WLAC property; Intersection 65 – Sepulveda Boulevard north of Century Boulevard.

As described in the second paragraph on page 4.9-46 of the Draft EIR, the distance at which construction equipment noise would result in a 5 dB(A) increase over the existing ambient noise level, consequently resulting in a significant noise impact, would be approximately 100 feet where the existing ambient noise level is 76.3 dB(A) CNEL, such as at the Concourse Hotel. Noise-sensitive uses in areas with existing ambient noise of 76.3 dB(A) CNEL would be significantly impacted if construction activity occurred within a distance of approximately 100 feet or less. This distance does not account for any intervening topography, buildings, or other obstructions that would further reduce noise. As indicated above in Response to Comment LAMP-AL00004-1, construction of the New Roadway north of the WLAC property is anticipated to occur within the Wally Park property. The proposed North Roadway would be approximately 175+ feet from the WLAC buildings. As such, construction of the New Roadway would not result in a 5 dB(A) increase over the existing ambient noise level. Therefore, no significant construction noise impact would occur at the WLAC property.

**LAMP-AL00004-8**

**Comment:** - Page 1018 of the DEIR erroneously states that the closest noise-sensitive receptor to 96th Street and Vicksburg is the Courtyard Marriot at Vicksburg and 98th Street. In this particular intersection, the Property is the closest noise sensitive receptor since it is on the same block.

**Response:** The text that the commentor is referring to on page 4.9-51 of the Draft EIR (PDF page 1018) pertains to the proposed removal of 96th Street, beginning just east of Vicksburg Avenue and extending eastward approximately 1,700 feet. The distance from the west end of that proposed street removal to the nearest point of the WLAC building complex is approximately 500 feet. The first two paragraphs on page 4.9-51 of the Draft EIR, have been revised as follows as indicated in Chapter 3, Corrections and Additions to the Draft EIR:

> "The existing 1,700 feet of W. 96th Street from just east of Vicksburg Avenue to Airport Boulevard would be closed and pavement would be demolished, including 96th Place. The closest noise-sensitive receptor to *the west end of* this construction area *would be the West Los Angeles College (WLAC) facility,* ~~Courtyard Marriot (RP2)~~ located ~~at the corner of Vicksburg Avenue and W. 98th Street~~ approximately ~~575~~ *500* feet south*west* from the closest point of construction-related activities.
>
> Based on existing ambient noise levels of ~~77.4~~ *76.3* dB(A) CNEL in the area of the ~~Courtyard Marriot~~ *Concourse* Hotel (refer to Table 4.9.3-3*, as revised in Chapter 3 of the Final EIR*), *which is south of, and near to, the WLAC site,* the distance at which construction equipment noise would result in a 5 dB(A) increase over the existing ambient noise level would be approximately ~~185~~ *100* feet. Noise sensitive uses with existing ambient noise of ~~77.4~~ *76.3* dB(A) CNEL would be significantly impacted if construction activity occurred within a distance of ~~185~~ *100* feet or less. These distances do not account for any intervening topography, buildings, or other obstructions that would further reduce noise. Given the distance to the closest sensitive receptor is greater than ~~185~~ *100* feet, construction equipment noise impacts on sensitive receptors from construction activities for the W. 96th Street closure and demolition would be less than

significant because construction activities would not exceed ambient exterior noise level by 5 dB(A) at a noise sensitive use."

The above revisions to page 4.9-51 of the Draft do not change the conclusion of the Draft EIR construction noise impact analysis; the construction noise impact associated with this element of the proposed Project would be less than significant.

**LAMP-AL00004-9**

**Comment:** - The Property is also the closest noise sensitive receptor to Southbound S. Sepulveda Boulevard to World Way where the skyway is being replaced and new ramps will be constructed on Sepulveda. It is unclear if drivers will be able to turn left onto the Property south of 96th Street or on 96th Street.

**Response:** The Southbound S. Sepulveda Boulevard to World Way Improvements would parallel, and extend along, the west side of Sepulveda Boulevard, which is shown as Improvement No. 6 on Figure 2-41 of the Draft EIR. The Concourse Hotel would be closer to the subject improvements than would the WLAC facility. The Concourse Hotel building extends to the west end of the property, with only approximately 25 feet between the building and Sepulveda Boulevard, whereas the WLAC facility is set back from Sepulveda Boulevard by approximately 75 feet, with a parking lot and sidewalk located between the subject facility and Sepulveda Boulevard.

Detailed design plans for the 96th Street modifications have not yet been prepared; therefore, details regarding access to and from 96th Street are not currently known. Relative to the WLAC site, the proposed Project would not affect access on 98$^{th}$ Street between Sepulveda Boulevard and Vicksburg Avenue, and there is an existing driveway at the WLAC site on that street segment.

**LAMP-AL00004-10**

**Comment:** - The closest Noise Survey Locations are Sepulveda & Century and 98th Street and Vicksburg. Given the proximity of the construction and operation of the New Road, as wells as the improvement, demolition and construction of new street, measurements should also be taken at the Property particularly considering the academic use.

**Response:** The ambient noise measurements taken near the intersection of Sepulveda Boulevard and Century Boulevard (i.e., RP1 – Concourse Hotel) are considered to be reasonably representative of existing ambient noise levels in that local area, which includes the WLAC site. Ambient noise levels would be similar at the WLAC site and the RP1 site, given that there is only a one block difference (approximately 700 feet) between the sites and that the major noise sources influencing the ambient noise levels in the subject area, being aircraft activity at LAX and vehicle traffic on Sepulveda Boulevard, are common to both areas.

**LAMP-AL00004-11**

**Comment:** - The highest single-hour measurement collected was at Century & Sepulveda. This intersection is one block from the Property. Noise and Vibration impacts on the academic use and the commercial use due to the New Road and immediate street improvements should also be analyzed.

**Response:** The Responses to Comments LAMP-AL00004-7 and LAMP-AL00004-8 account for the ambient noise measurements taken near the intersection of Sepulveda Boulevard and Century Boulevard

(i.e., RP1 – Concourse Hotel). As discussed in those responses, construction and roadway noise impacts on the WLAC facility would be less than significant.

Regarding vibration, the second and third paragraphs on page 4.9-58 of the Draft EIR address impacts from construction equipment vibration. As described therein, there are various sensitive receptors located in proximity to different areas of proposed Project-related construction, the closest of which are approximately 50 feet from construction. At 50 feet, even the most substantial vibration, that being from large bulldozers operating within 50 feet, would not exceed the applicable threshold of significance. Table 4.9.3-8 on page 4.9-57 of the Draft EIR identifies the vibration levels associated with various types of construction equipment operating at a distance of 25 feet, 50 feet, 75 feet, and 100 feet. The WLAC facility is located approximately 175 feet from the proposed New Roadway and associated improvements. For the most vibration-intensive construction equipment listed in Table 4.9.3-8, that being a large bulldozer, the vibration level at a distance of 175 feet would be approximately 0.005 inches per second peak particle velocity (PPV). That vibration level is well below any and all of the construction equipment vibration thresholds of significance listed on page 4.9-40 of the Draft EIR, the most restrictive being 0.12 PPV.

In terms of vibration from roadway traffic, the WLAC property is located on Sepulveda Boulevard, a heavily travelled street, whose vehicles currently may create vibration. Specifically, the WLAC facility is located closer to Sepulveda Boulevard than it is to the proposed new roadway, which itself, is being constructed on top of the existing W. 96th Street, whose vehicles currently may create vibration. Vibration from traffic would therefore not be significantly different than what is experienced at the WLAC property today.

**LAMP-AL00004-12**

**Comment:** - The DEIR Appendix M page 47 states that higher vibration levels were measured in the western half of the study area, closer to the LAX CTA. It is unclear if this only considered the immediate surrounding street improvements or the New Road as well. The traffic noise modeling should measure the vibration and noise on the Property, given that it will be surrounded by Project construction and new Project operational activity.

**Response:** As indicated in the Summary at the bottom of page M-44 (PDF page 47) of Appendix M of the Draft EIR, the ambient vibration survey was conducted to establish existing ground-borne vibration conditions along the future corridor of the LAX Landside Access Modernization Program Automated People Mover (APM) system. The data collected was used to predict maximum vibration levels that would result from construction and operation of the LAX Landside Access Modernization Program APM system.

Regarding potential construction-related vibration at the WLAC site, please see Response to Comment LAMP-AL00001-11. Regarding potential operations-related vibration at the WLAC site, Figure 4.9.4-2 in the Draft EIR delineates the projected vibration levels with Project implementation. The transit vibration thresholds of significance presented on page 4.9-66 of the Draft EIR apply to residences and buildings where people normally sleep, including hotels, with those thresholds being 72 - 80 vibration decibels (VdB). Notwithstanding that the WLAC facility is not the type of use considered to be vibration-sensitive relative to the thresholds of significance, the transit vibration levels estimated to occur at the WLAC site would be less than 55 VdB, as can be seen in Figure 4.9.4-2. See Response to Comment LAMP-AL00004-11 for a discussion of vibration from roadway traffic.

**LAMP-AL00004-13**

**Comment:** - The widening of 98th Street failed to identify the Property as noise sensitive receptors.

**Response:** As described on pages 4.9-52 and 4.9-53 of the Draft EIR, and depicted on Figure 2-42 of the Draft EIR, the proposed widening of 98th Street would occur on the segment between the proposed new "A" Street and Airport Boulevard. As such, the nearest point of construction for this Project element would be approximately1,500 feet from the WLAC site. See Response to Comment LAMP-AL00004-7 for a discussion of construction noise.

As described in the second paragraph on page 4.9-46 of the Draft EIR, the distance at which construction equipment noise would result in a 5 dB(A) increase over the existing ambient noise level, consequently resulting in a significant noise impact, would be approximately 100 feet where the existing ambient noise level is 76.3 dB(A) CNEL, such as at the Concourse Hotel. Noise-sensitive uses in areas with existing ambient noise of 76.3 dB(A) CNEL would be significantly impacted if construction activity occurred within a distance of approximately 100 feet or less. This distance does not account for any intervening topography, buildings, or other obstructions that would further reduce noise. Because widening of W. 98th Street would be approximately 1,500 feet from the WLAC buildings, this construction element would not result in a 5 dB(A) increase over the existing ambient noise level. No significant construction noise impact would occur at the WLAC property.

**LAMP-AL00004-14**

**Comment:** - Sepulveda & Century is identified as a Ground Vibration Monitoring Location (pg 1004 or Figure 4.9.3-2). Given the proximity of the New Road and the immediate surrounding of street being improved on the Property, vibration analysis should be made of the Site in which instruction will be conducted a few feet away from the Road and vehicles will be parking.

**Response:** Please see Response to Comment LAMP-AL00004-11 regarding potential construction- and operation-related vibration levels at the WLAC site.

**LAMP-AL00004-15**

**Comment:** - Impacts of "A" street, excavation utility relocation (pg 1017 DEIR) not too far from the Site should also be analyzed to determine what if any impacts they will have on the Property. Due to the anticipated various street improvements and New Road construction and operation on part of the Property the traffic noise modeling and vibration should be measured on the segment of New Road and the Property.

**Response:** The construction of 'A' Street, including the associated utility relocation work, would occur at a distance of approximately 1,500 from (east of) the WLAC facility. At that distance, no significant construction or operational noise and vibration impacts would occur at the subject facility.

**LAMP-AL00004-16**

**Comment:** Lastly, the impacts the vibration will have on the Property should consider the hangars and the current and future structures on site. Will there be structural impacts due to the Project and if so how will they be mitigated. Will vibration cause subsidence, settling, tilting, cracking, collapse of existing and future structures or overall weakening?

**Response:** Please see Response to Comment LAMP-AL00004-11 regarding potential construction- and operation- related vibration levels at the WLAC site.

**LAMP-AL00004-17**

**Comment:** Public Services The DEIR failed to recognize the Property as an academic institution. As mentioned above, WLAC currently uses the Property for the warehousing of movie set props and for instruction to support its Film/Television Production Crafts program. The type of instructional services provided at the Property cannot be duplicated at other District-owned facilities and as such is integral to the program's educational purposes. Today, expanding the academic component is an option available to the District today. The FEIR should recognize the Property as an academic Site in order to analyze the impacts appropriately. An acceptable instructional and training environment and the ability to maintain performance objectives will be impacted and thus must be mitigated. The DEIR cites school relocation as a mitigation measure. This measure should also be considered in relation to the District Property, as it is an active educational facility and the New Road planned on a portion of it and its related improvements may be disruptive to outdoor and indoor instruction.

**Response:** Subsection 4.11.3, Schools, within the Public Services section of the Draft EIR addresses Project-related impacts to the Stella Middle Charter Academy and Bright Star Secondary Charter Academy, both of which are located in Manchester Square where LAX Landside Access Modernization Program improvements, specifically the ITF East and CONRAC, are proposed. As indicated on page 4.11-53 of the Draft EIR, implementation of the proposed Project would include acquisition of the site that contains these schools. Relocation of these schools has already been identified as part of LAWA's ongoing Airport Noise Mitigation Program (ANMP). Based on the potential that relocation of these two schools could result in indirect impacts (i.e., construction and operation of the schools at a new location(s) could result in impacts specific to each relocation), although the nature, extent, and location of such impacts is unknown at this time because relocation specifics have not been determined, the Draft EIR includes Mitigation Measure MM-PS (LAMP)-1, School Relocations,[1] which acknowledges that Los Angeles Unified School District, as lead agency, for school relocations, will evaluate the environmental impacts of the specific relocation proposal(s) and adopt mitigation measures, as required by the California Environmental Quality Act (CEQA).

Unlike the two schools referenced above, implementation of the proposed Project would not require acquisition of the WLAC site or relocation of the subject facility, or result in the need for new or physically altered school facilities. Neither the Draft EIR nor commentor identify any impacts that would affect the ability of WLAC to maintain an acceptable instructional and training environment; any potential impact on WLAC's ability to maintain an acceptable instructional and training environment and maintain performance objectives is speculative and would not be considered an impact on the physical environment under CEQA. (See CEQA Guidelines § 15131.) The types of Project-related impacts to the WLAC facility expressed in the commentor's other comments have all been addressed in accordance with CEQA requirements; please see Responses to Comments LAMP-AL00004-1 through LAMP-AL00004-31. Recognition of the subject property as used for educational as well as commercial uses does not result in any new or substantially more severe significant environmental impacts compared to those disclosed in the Draft EIR, or require the development of any additional mitigation measures.

[1] A typographical error in the Draft EIR pertaining to the title of this mitigation measure has been corrected as follows to clarify that this mitigation measure is specific to the proposed Project and is not a LAWA Standard Control Measure applicable to all LAX projects: ~~LAX~~ *MM*-PS (LAMP)-1, School Relocations ~~Impacts~~. This typographical error has been corrected throughout the text of the Draft EIR (See Chapter 3, Corrections and Additions to the Draft EIR).

**LAMP-AL00004-18**

**Comment:** Transportation/ Traffic Ease of ingress and egress to and from the Site is of grave importance as well as access to LAX once the drivers have parked. It is unclear if customers parking on the Site will have better access to the airport after the Project or if the Property will become an isolated. It is also unclear whether the delays to the Property for students, staff and LAX passengers, due to closures, re-routing, staging, will be mitigated. The DEIR takes a global approach and measures to mitigate impacts to the Property should be analyzed. More details are needed to ascertain the following: - Will drivers be able to park then walk to the ITF West or ride the APM directly into the airport?

**Response:** Please see Response to Comment LAMP-AL00004-1 above in regards to comments concerning site access. Mitigation Measure MM-ST (LAMP)-1, Construction Traffic Project Task Force, discussed in Section 4.12.3.8 of the Draft EIR, and as revised in Chapter 3, Corrections and Additions to the Draft EIR, requires LAWA to establish a Project Task Force to which would, among other things, ensure that pedestrian, business, bicycle, and traffic flow is considered during all phases of construction and that emergency access routes are maintained. The Project Task Force that may be comprised of key stakeholders from LAWA, the Coordination and Logistic Management Team (CALM), other City departments, and others as deemed appropriate. This Project Task Force would provide input into worksite traffic control plans and other traffic management plans that are developed for the Project. The Project Task Force would review the traffic management plans to ensure the following topics are considered:

- Coordination with all other LAWA construction projects;
- Coordination with other public infrastructure projects;
- Detour impact analysis for pedestrian, business, bicycle, and traffic flow;
- Coordinate closures and restricted access with all potential special events and holiday traffic flow;
- Notification to the public with use of static signage, changeable message signs, media announcements, Airport website, etc.;
- Work with LAWA police and the Los Angeles Police Department to enforce delivery times and routes;
- Coordinate with police and fire personnel regarding maintenance of emergency access and response times;
- Monitor and coordinate deliveries;
- Establish detour routes;
- Work with residential and commercial neighbors regarding upcoming construction activities; and
- Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

Regarding the query “Will drivers be able to park then walk to the ITF West and ride the APM directly to the Airport?”, the drivers would be able to park at the WLAC site, then walk to the ITF West and ride the APM directly to the Airport.

**LAMP-AL00004-19**

**Comment:** - Will egress to the Site off-of Sepulveda be eliminated.

**Response:** Please see Response to Comment LAMP-AL00004-1. The access changes the commentor is stating would potentially occur in Phase 2 of the proposed Project. All these changes would be coordinated with WLAC at the time of final design of Phase 2 components of the proposed Project, with the objective of not isolating the WLAC property nor making access to the WLAC property more challenging.

**LAMP-AL00004-20**

**Comment:** - Will Vicksburg be entirely demolished (Pg. 4.12-96) so that access to the Site is only through 98th Street and drivers that are parking for the day and faculty and students are forced to use the same entrance and exit?

**Response:** As indicated in Table 2-7 and shown on Figure 2-41 in Chapter 2, Description of the Proposed Project, of the Draft EIR, Vicksburg Avenue at 96th Street would be demolished as part of the proposed Project. In other words, the signalized intersection of Vicksburg at 96th Street would be removed with both the north and south legs of the intersection vacated. However, Vicksburg Avenue is planned to be retained between Century Boulevard and points north of 98th Street, so that access to and from the WLAC and adjacent property could be maintained off of Vicksburg Avenue.

**LAMP-AL00004-21**

**Comment:** - What will be constructed in Vicksburg's place? - Which intersections immediately surrounding the Project will be signalized to manage traffic-flow and to increase pedestrian safety.

**Response:** As described in Chapter 2, Description of the Proposed Project, of the Draft EIR, the intersections of Sepulveda Boulevard at 96th Street; 96th Street at New "A" Street; 98th Street at New "A" Street; Century Boulevard at New "A" Street; and Vicksburg Avenue at Century Boulevard would all be signalized to manage traffic and pedestrian flows. Vicksburg Avenue would remain in place, but would have a cul-de-sac north of 98th Street. Figure 2-41 in Chapter 2, Description of the Proposed Project, has been corrected as shown in Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-AL00004-22**

**Comment:** - Page 4.12-96 mentions the W. 98th Street Underpass. What is the cross street where this underpass is located? Was this meant to replace the New Road during the NOP stage?

**Response:** Table 2-7 in Section 2.4.4 of Chapter 2, Description of the Proposed Project, lists the proposed roadway improvements, including the W. 98th Street underpass (see Item 36 in Table 2-7 on page 2-132). As described in that table and depicted on Figure 2-42 in Chapter 2 of the Draft EIR, the W. 98th Street Underpass refers to an improvement proposed between the new Concourse Way and La Cienega Boulevard. An underpass of W. 98th Street would be constructed in order to allow eastbound traffic on W. 98th Street to access the Consolidated Rental Car Facility (CONRAC). It has nothing to do with the underpass identified in the NOP along Sepulveda Boulevard, which was subsequently dropped from the Project, because it was determined to be infeasible.

**LAMP-AL00004-23**

**Comment:** - Phase 2 at page 4-12-97 mentions a tunnel on Sepulveda and 96th street, is this similar to the tunnel envisioned in the NOP?

**Response:** Page 4.12-97 in Section 4.12.2.6.2 of Section 4.12.2, Off-Airport Transportation, of the Draft EIR, identifies a series of proposed Project improvements in Phase 2. The comment refers to the first bullet item in this section, "S. Sepulveda Boulevard (LAX Airport Tunnel to W. 96th Street)". This improvement refers to improvements on S. Sepulveda Boulevard *between* the existing LAX Airport Tunnel (also called the Sepulveda Boulevard Tunnel) and W. 96th Street. These improvements are depicted on Figure 2-41 (see Items 6, 16, and 17) in Chapter 2, Description of the Proposed Project.

**LAMP-AL00004-24**

**Comment:** Many improvements are occurring around the property, along W. 96th Street, including street closures (4.12-96), new street construction and Sky Bridge Removal. It is unclear whether impacts to both the parking operation and the academic use specific to the Property were analyzed. It is also unclear if the property will be so difficult to access that neither the commercial nor the academic use will continue to be successful.

**Response:** Please see Response to Comment LAMP-AL00004-1 above. Vehicular and pedestrian access and circulation to and from the WLAC property would be maintained at all times, both during and post-construction, so that academic uses would not be significantly affected. Specific details would be coordinated at the time of final design.

**LAMP-AL00004-25**

**Comment:** The Project will create a significant impact at the intersection of Century and Sepulveda. It is unclear the volume and speed of vehicles anticipated using the New Road coming north on Sepulveda and the impact to the intersection of 98th and Sepulveda. The intersection of 98th and Sepulveda becomes a critical intersection for the Property and drivers may no longer be able to access the Property for airport parking off of Sepulveda or 96th and drivers and students would be forced to go around if they miss the turn onto 98th. It does not appear the 98th will have a signal light therefore access to the Property will become much more challenging with the Project.

**Response:** As discussed in Response to Comment LAMP-AL00001-4 above, access to the WLAC property would remain unchanged during Phase 1 of the proposed Project. With the proposed Project Phase 2 components, access to the WLAC property would continue to be off of 98th Street (both east and west) and Vicksburg Avenue. Additional specific property level changes would be coordinated at the time of final design when precise details relative to roadway alignment, etc. would be known, with the objective of not isolating the WLAC property nor making access to the WLAC property more challenging.

**LAMP-AL00004-26**

**Comment:** MM-ST (LAMP) 17-recommends modification of Sepulveda and Century Blvd. and it is unclear what this would mean further north on Sepulveda.

**Response:** As noted in Section 4.12.2.9.4 of the Draft EIR, mitigation proposed at the intersection of Sepulveda Boulevard and Century Boulevard (MM-ST (LAMP)-17) would involve restriping the westbound approach to provide three left-turn lanes and a separate right-turn lane. Sepulveda Boulevard north of Century Boulevard would not have any changes due to this mitigation measure and there would be no change to the intersection of Sepulveda Boulevard and 98th Street. Access to the WLAC property would be available to/from 98th Street (both from the east and west) and off of Vicksburg Avenue.

**LAMP-AL00004-27**

**Comment:** On Phase 2 (4.12.3.7.3) the Project has a significant impact on Sepulveda & Century and Sepulveda & Lincoln, the Property is between these two intersections and mitigation measures did not address direct impact to ingress and egress to the Property.

**Response:** The commentor is referring to the construction traffic impact at the intersections of Sepulveda at Lincoln and Century Boulevards. Mitigation Measure MM-ST (LAMP)-3, Worksite Traffic Control Plans, discussed in Section 4.12.3.8 of the Draft EIR, requires that Worksite Traffic Control Plans (WTCPs) with specific requirements to manage traffic flow, access and circulation around the construction sites be prepared before the start of construction. LAWA and its contractors would coordinate with WLAC at the time of preparation of WTCPs to address specific access and circulation issues. Please also see Response to Comment LAMP-AL00002-18 which describes the Project Task Force that would be established as part of Mitigation Measure MM-ST (LAMP)-1 to develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction of the proposed Project.

**LAMP-AL00004-28**

**Comment:** With regards to MM-ST LAMP 3, LACCD would welcome being involved in the Worksite Traffic Control Plans conversations in order to share parking ingress and egress concerns as well as to share academic schedule and what works best for the commercial parking operation on Site. (page 1373)

**Response:** Please see Response to Comment LAMP-AL00004-27 above.

**LAMP-AL00004-29**

**Comment:** District is in agreement with MM-ST LAMP 5 that access remains unobstructed for land uses in proximity to the Project site during construction. As it relates to the academic use, we welcome an opportunity to share the academic schedule with LAWA to ensure that there is no disruption to the academic activities on Site.

**Response:** Please see Response to Comments LAMP-AL00004-27 and 28 above.

**LAMP-AL00004-30**

**Comment:** The Truck Routes down Sepulveda have been established (4.12-239) to travel from Sepulveda & Westchester Parkway to Sepulveda & Imperial Highway. The impacts to the property ingress an egress resulting from the travel of large trucks along with improvements on Sepulveda and surrounding streets should be analyzed as the primary access to the Site is from Sepulveda and 96th fro Drivers and 98th Street for Students.

**Response:** As described in Appendix P (section on construction vehicle haul routes and distributions beginning on page 148 of the pdf) and shown on Figure 4.12.3-3 in Section 4.12.3, Construction Surface Transportation, of the Draft EIR, haul trucks delivering materials to/from the staging areas were assumed to use a combination of the freeway system (I-405, I-105), Imperial Highway, Aviation Boulevard, Century Boulevard, and Airport Boulevard. As stated in Mitigation Measure MM-ST (LAMP)-1, for dirt, aggregate, bulk cement, and all other materials and equipment, truck deliveries to the LAX area will be on designated routes only (freeways and non-residential streets). Specifically, in regards to Sepulveda Boulevard, haul trucks are limited to the section of roadway between Westchester Parkway and Imperial Highway. However, due to the location of staging areas, and the haul truck routing assumptions, any haul truck traffic using

Sepulveda Boulevard (for mitigation reasons) would only access the section of Sepulveda Boulevard between Century Boulevard and Imperial Highway. Therefore, haul trucks would not be included in either the Sepulveda Boulevard/96th Street intersection or the Sepulveda Boulevard/98th Street intersection.

Additionally, as stated in Section 4.12.3.8 (MM-ST (LAMP)-1), a Project Task Force would be established to work with residential and commercial neighbors, including Gateway BID members such as the Los Angeles Community College District, regarding upcoming construction activities and develop a comprehensive and long-term impact outreach strategy for implementation during construction.

**LAMP-AL00004-31**

**Comment:** The District is supportive of LAWA's efforts to improve the passenger travel experience. We request that the FEIR recognize the Property as an active academic use as well as a commercial use and analyze the impacts and recommend mitigation measure accordingly. It is the District's intent to continue to provide instructional services on this very uniquely positioned asset and continue with the current lease arrangement to generate revenue for WLAC and to provide District staff parking in the Downtown Los Angeles area. Should you have any questions please feel free to contact me directly at 213-891-2119. Sincerely, Thomas L. Hall Director of Facilities, Planning & Development

**Response:** Please see Responses to Comments LAMP-AL00004-1 through LAMP-AL00004-30 above. As discussed in the above responses, the Final EIR recognizes the subject property as an active academic use as well as a commercial use. Recognition of the subject property for educational as well as commercial uses does not result in any new or substantially more severe significant environmental impacts compared to those disclosed in the Draft EIR, or require the development of any additional mitigation measures.

## LAMP-AL00005 Saucedo, Silvia LA Community College District 11/15/2016

**LAMP-AL00005-1**

**Comment:** Ms. Quintanilla: On behalf of the Los Angeles Community College District ("District") and West Los Angeles College ("WLAC"), thank you for the opportunity to provide comments on the Draft Environmental Impact Report ("DEIR") for Los Angeles International Airport ("LAX") Landside Access Modernization Program ("Project"). As you know, the District owns approximately 4.82 acres of land located at 9700 S. Sepulveda Boulevard ("Property" or "Site"). The Property lies on the north side of 98th Street, and runs from Sepulveda Boulevard to Vicksburg Avenue. The Property is adjacent to the land owned by Wally Park, which lies on the south side of 96th and also runs from Sepulveda Boulevard to Vicksburg Avenue ("Adjacent Property"). The Property is improved with two airplane hangars that WLAC currently uses for the warehousing of movie set props and for instruction to support its Film/Television Production Crafts program. The type of instructional services provided at the Property cannot be duplicated at other District-owned facilities and as such is integral to the program's educational purposes. The remaining portion of the Property is generating revenue for WLAC via a surface parking ground-lease and providing District headquarters with parking downtown in exchange for parking at the Site. We have the following general comments: During the NOP comment stage, the Project drawings depicted the construction of an underpass, underneath the Property, from southbound Sepulveda Boulevard. The DEIR Project drawings, no longer depict the tunnel, the Project now anticipates acquiring the Adjacent Property and constructing a new at-grade roadway having its inception north bound on

Sepulveda between 98th and 96th Street ("New Roadway"), cutting through a portion of the District Property and running the length of the Adjacent Property. The New Roadway appears to curve at New "A" Street and lead to the ITF West and CTA. Two main issues are of serious concern. One: The New Road will be constructed partially on District Property impacting the District's ability to use the Site in the future, academically, as a revenue generator and with the existing arrangement for District parking Downtown. It is unclear what at grade improvements will be required on the Property and adjacent streets to support the New Road on the Site. We need more detail to understand whether the New Road will be covered, retaining or sound walls constructed, set-backs required, and if changes on Sepulveda will relocate the ingress and egress to and from the Property to truly understand the practical implications of the Project during construction and operation. Additional detail will make clear whether the Project will have the effect of isolating the Site or making access to the Site extremely challenging that drivers simply decide to park elsewhere or deters students from attending class. The numerous road closures, new street configurations and construction of new streets will all impact access to the Site. Construction of the New Roadway without taking/using a portion of the District Property should be strongly considered and analyzed. DEIR indicates 96th Street between Sepulveda and Vicksburg will be significantly improved and Vicksburg demolished. Perhaps the widening 96th Street may wholly encompass the New Roadway. Constructing the New Roadway further north entirely on the Adjacent Property is also an option. Secondly, the DEIR does not recognize the Property as an educational facility. It is identified as a purely commercially used Site. As explained above, the Site is an integral part to the WLAC Film/Television Production Crafts Program and labs are held on Site. The DEIR fails to analyze the impacts of the Project and New Road on sensitive users a few feet away and adjacent to some of the other components of the Project. Additionally, expanding the academic component to the entire Site is an option available to the District today. We also need more clarity as it relates to other Entitlements that are being requested. The Property is uniquely positioned and the District derives great benefits from its current uses as both a commercial and an educational site. What are the General Plan Amendments, Specific Plan Amendments and Zone changes being sought? Would they prohibit or limit the current uses and future uses on Site? We request that the FEIR recognize the Property also as an academic use, in order for the correct impacts to be determined and the correct mitigation measures be recommended. Air Quality Figure 4.2.2-1 identifies the Property as a commercial site only. As mentioned above, the Property is being used for instructional purposes and a corresponding air quality analysis should be made. Instruction at times is provided outdoors and the decrease in air quality due to the New Roadway (construction and operation) just a few feet away should be analyzed considering this use. Among other impacts, the exhaust from the vehicles travelling on the New Roadway to the CTA and dust particles in the area will likely increase having a health impact on the students. The DEIR states that with appropriate mitigation most of the impacts are reduced to a level that is less than significant, and there are a few significant and unavoidable impacts with mitigation. However, the DEIR did not recognize the Property as an academic use to arrive at the conclusion. We request that the FEIR recognizes the Property as an academic use, in order for the correct impacts to be determined and the correct mitigation measures to be in place. In addition, dust particles may create additional maintenance costs for the District facility, this should be analyzed and the impacts mitigated. As it relates to the parking use, the construction and operation of the New Road will impact the amount of dust and debris accumulated on the vehicles, which may then deter potential drivers from parking on the Property. Appropriate dust mitigations should be implemented. Hazards and Hazardous Materials Allied Aviation Services Co. and Park One/Honeywell International, both across the street from the Property, are listed in the Hazardous Material Sites of Concern in Table 4.6.1-1 of the DEIR. The DEIR states that with appropriate mitigation the impacts are reduced to a level that is less than significant. However, the DEIR did not recognize the Property as an academic use to arrive at the conclusion. In the FEIR the Property should be recognized as an academic use, in order for the correct: 1) mitigation measures to be in place; and 2) procedures to be set in place should there be a release and exposure to the students. LAWA should consider appropriate mitigation

measures during the excavation, improvement, demolition and construction of the New Road, Sepulveda, 96th Street, 98th Street, Vicksburg and other surrounding streets given the proximity to the Property and the exposure to students. Trucks transporting hazardous materials on the New Road should take appropriate mitigation measures to reduce dangers associated with hazardous materials to students on Site and parking customers. Hydrology and Water Quality The Project should analyze to determine if there will be a change in the drainage pattern on the Property, that may result in flooding and damage to the hangars on the Site as well as to the movie props inside. Page 38 of Appendix L of the DEIR states that the existing drainage pattern is East and South, however, the drainage pattern is not analyzed on the Property itself after the New Road is constructed. It is unclear if the drainage pattern is altered due to the construction of the New Road and its related improvements. In addition, it is unclear if the storm-water capture beneath the ConRAC facility would be effective in mitigating any run-off from the Property. While the other project facilities have not proposed detention measures, detention resulting from the New Road should be considered, especially since the hangars will remain on Site. Noise & Vibration The DEIR does not recognize the Property as one with an academic use. Page 13 of Appendix M states that "sensitive land-uses and establishments situated close to future construction zones were identified in the screening survey," however the Property was not identified as an academic use, accordingly the impacts to the District students were not analyzed. The FEIR should recognize the Property as an academic use, in order for the correct impacts to be determined and the correct mitigation measures be recommended during construction (construction and equipment noise) and during operation. In this vein, our comments below relate to a few intersections that omitted the specific analysis of the Property with the New Road and the academic use: - Page 1018 of the DEIR erroneously states that the closest noise-sensitive receptor to 96th Street and Vicksburg is the Courtyard Marriot at Vicksburg and 98th Street. In this particular intersection, the Property is the closest noise sensitive receptor since it is on the same block. - The Property is also the closest noise sensitive receptor to Southbound S. Sepulveda Boulevard to World Way where the skyway is being replaced and new ramps will be constructed on Sepulveda. It is unclear if drivers will be able to turn left onto the Property south of 96th Street or on 96th Street. - The closest Noise Survey Locations are Sepulveda & Century and 98th Street and Vicksburg. Given the proximity of the construction and operation of the New Road, as wells as the improvement, demolition and construction of new street, measurements should also be taken at the Property particularly considering the academic use. - The highest single-hour measurement collected was at Century & Sepulveda. This intersection is one block from the Property. Noise and Vibration impacts on the academic use and the commercial use due to the New Road and immediate street improvements should also be analyzed. - The DEIR Appendix M page 47 states that higher vibration levels were measured in the western half of the study area, closer to the LAX CTA. It is unclear if this only considered the immediate surrounding street improvements or the New Road as well. The traffic noise modeling should measure the vibration and noise on the Property, given that it will be surrounded by Project construction and new Project operational activity. - The widening of 98th Street failed to identify the Property as noise sensitive receptors. - Sepulveda & Century is identified as a Ground Vibration Monitoring Location (pg 1004 or Figure 4.9.3-2). Given the proximity of the New Road and the immediate surrounding of street being improved on the Property, vibration analysis should be made of the Site in which instruction will be conducted a few feet away from the Road and vehicles will be parking. - Impacts of "A" street, excavation utility relocation (pg 1017 DEIR) not too far from the Site should also be analyzed to determine what if any impacts they will have on the Property. Due to the anticipated various street improvements and New Road construction and operation on part of the Property the traffic noise modeling and vibration should be measured on the segment of New Road and the Property. Lastly, the impacts the vibration will have on the Property should consider the hangars and the current and future structures on site. Will there be structural impacts due to the Project and if so how will they be mitigated. Will vibration cause subsidence, settling, tilting, cracking, collapse of existing and future structures or overall weakening? Public Services The DEIR failed to recognize the Property as an academic institution. As mentioned

above, WLAC currently uses the Property for the warehousing of movie set props and for instruction to support its Film/Television Production Crafts program. The type of instructional services provided at the Property cannot be duplicated at other District-owned facilities and as such is integral to the program's educational purposes. Today, expanding the academic component is an option available to the District today. The FEIR should recognize the Property as an academic Site in order to analyze the impacts appropriately. An acceptable instructional and training environment and the ability to maintain performance objectives will be impacted and thus must be mitigated. The DEIR cites school relocation as a mitigation measure. This measure should also be considered in relation to the District Property, as it is an active educational facility and the New Road planned on a portion of it and its related improvements may be disruptive to outdoor and indoor instruction. Transportation/ Traffic Ease of ingress and egress to and from the Site is of grave importance as well as access to LAX once the drivers have parked. It is unclear if customers parking on the Site will have better access to the airport after the Project or if the Property will become an isolated. It is also unclear whether the delays to the Property for students, staff and LAX passengers, due to closures, re-routing, staging, will be mitigated. The DEIR takes a global approach and measures to mitigate impacts to the Property should be analyzed. More details are needed to ascertain the following: - Will drivers be able to park then walk to the ITF West or ride the APM directly into the airport? - Will egress to the Site off-of Sepulveda be eliminated. - Will Vicksburg be entirely demolished (Pg. 4.12-96) so that access to the Site is only through 98th Street and drivers that are parking for the day and faculty and students are forced to use the same entrance and exit? - What will be constructed in Vicksburg's place? - Which intersections immediately surrounding the Project will be signalized to manage traffic-flow and to increase pedestrian safety. - Page 4.12-96 mentions the W. 98th Street Underpass. What is the cross street where this underpass is located? Was this meant to replace the New Road during the NOP stage? - Phase 2 at page 4-12-97 mentions a tunnel on Sepulveda and 96th street, is this similar to the tunnel envisioned in the NOP? Many improvements are occurring around the property, along W. 96th Street, including street closures (4.12-96), new street construction and Sky Bridge Removal. It is unclear whether impacts to both the parking operation and the academic use specific to the Property were analyzed. It is also unclear if the property will be so difficult to access that neither the commercial nor the academic use will continue to be successful. The Project will create a significant impact at the intersection of Century and Sepulveda. It is unclear the volume and speed of vehicles anticipated using the New Road coming north on Sepulveda and the impact to the intersection of 98th and Sepulveda. The intersection of 98th and Sepulveda becomes a critical intersection for the Property and drivers may no longer be able to access the Property for airport parking off of Sepulveda or 96th and drivers and students would be forced to go around if they miss the turn onto 98th. It does not appear the 98th will have a signal light therefore access to the Property will become much more challenging with the Project. MM-ST (LAMP) 17-recommends modification of Sepulveda and Century Blvd. and it is unclear what this would mean further north on Sepulveda. On Phase 2 (4.12.3.7.3) the Project has a significant impact on Sepulveda & Century and Sepulveda & Lincoln, the Property is between these two intersections and mitigation measures did not address direct impact to ingress and egress to the Property. With regards to MM-ST LAMP 3, LACCD would welcome being involved in the Worksite Traffic Control Plans conversations in order to share parking ingress and egress concerns as well as to share academic schedule and what works best for the commercial parking operation on Site. (page 1373) District is in agreement with MM-ST LAMP 5 that access remains unobstructed for land uses in proximity to the Project site during construction. As it relates to the academic use, we welcome an opportunity to share the academic schedule with LAWA to ensure that there is no disruption to the academic activities on Site. The Truck Routes down Sepulveda have been established (4.12-239) to travel from Sepulveda & Westchester Parkway to Sepulveda & Imperial Highway. The impacts to the property ingress an egress resulting from the travel of large trucks along with improvements on Sepulveda and surrounding streets should be analyzed as the primary access to the Site is from Sepulveda and 96th fro Drivers and 98th Street for Students. The District is supportive of LAWA's

efforts to improve the passenger travel experience. We request that the FEIR recognize the Property as an active academic use as well as a commercial use and analyze the impacts and recommend mitigation measure accordingly. It is the District's intent to continue to provide instructional services on this very uniquely positioned asset and continue with the current lease arrangement to generate revenue for WLAC and to provide District staff parking in the Downtown Los Angeles area. Should you have any questions please feel free to contact me directly at 213-891-2119. Sincerely, Thomas L. Hall Director of Facilities, Planning & Development

**Response:** The content of this comment letter is identical to comment letter LAMP-AL00004; please refer to the responses to comment letter LAMP-AL00004.

## LAMP-AL00006 Lichman, Barbara, Buchalter Nemer, A Professional Law Corporation (City of Culver City) 11/15/2016

**LAMP-AL00006-1**

**Comment:** The following constitutes the comments of the City of Culver City ("City") concerning the Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program ("Project" or "LAMP").

I. THE USE OF A BASELINE DATE OTHER THAN 2015 IS QUESTIONABLE

The DEIR asserts that it uses a baseline date other than the year 2015 where 2015 "by itself is not an appropriate representation of baseline conditions." Nevertheless, CEQA requires that the baseline for analysis in an environmental document be "the physical environmental conditions in the vicinity of the project as they exist at the time the notice of preparation is published, or, if no notice of preparation is published, at the time the environmental analysis is commenced . . ." 14 Cal. Code Regs. § 15125(a). Thus, the DEIR must more specifically define the circumstances, the environmental category, and reasons why it is not "appropriate" to use, the CEQA specified baseline. Otherwise, there is a clear danger that environmental impacts will be understated by the use of late baselines into which levels of environmental impact have already been incorporated, thus minimizing the environmental impacts of the Project.

**Response:** CEQA Guidelines Section 15125(a) does require that the EIR include "a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published." However, the commentor is incorrect that CEQA requires this description to be the baseline for analysis. CEQA Guidelines Section 15125(a) specifies that the environmental setting "will *normally* constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." (Emphasis added.) There are circumstances where the time that the notice of preparation is published is not the best representation of baseline physical conditions, and the Lead Agency has the discretion to decide how the existing physical conditions without the project can most realistically be measured. (See *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439.)

As stated on page 4-4 of Chapter 4, Environmental Impact Analysis, of the Draft EIR, the Notice of Preparation (NOP) for the LAX Landside Access Modernization Program EIR was published on February 5, 2015. In accordance with the provisions of CEQA, 2015 is the baseline year for characterizing existing conditions in the environmental analysis. Where existing conditions data specific to 2015 were not available or where 2015, by itself, was not an appropriate representation of baseline conditions, the Draft EIR identifies this fact, explains what data was

used to determine existing conditions, and provides evidence of why this information is representative of baseline conditions.

For certain analyses, a full year's worth of data was considered necessary and appropriate to characterize existing baseline conditions. Such is the case relative to existing air pollutant emissions and existing Airport traffic generation, whereby the variability in Airport operations throughout the year, especially seasonal variations, results in "existing" conditions for those topics being very different depending on time of year. For these analyses, data for the prior calendar year, which in the case of this EIR is 2014, were used to define existing baseline conditions for these topics.

CEQA does not require a public agency to wait until a calendar year ends to gather existing data so that the baseline analysis is strictly confined to the calendar year in which the NOP was published, nor would it be prudent to do so. Due to the highly developed nature of LAX and the surrounding communities, and the lack of economic growth in recent years, there is substantial evidence that site conditions at and around LAX did not materially change between 2014 and 2015. Therefore, the available information in 2014 that was used to characterize baseline conditions, is considered to be generally representative of 2015 conditions.

**LAMP-AL00006-2**

**Comment:** II THE DEIR IMPROPERLY ANALYZES THE PROJECT'S 900,000 SQUARE FEET OF FUTURE RELATED DEVELOPMENT AT THE "PROGRAM" LEVEL

The DEIR takes the position that the 900,000 square feet of "future related development" to be located around the CONRAC and ITF is so amorphous in its development prospects that it is impossible to adequately analyze at a project level of detail.

Nevertheless, the fact that specific development options have not yet been specified does not preclude the possibility of some specific environmental review of potential uses as determined by the Los Angeles City Zoning Code and other governing ordinances. In fact, "the level of detail should correspond to the level of detail of the program, plan, policy or ordinance that is proposed," 14 Cal. Code Regs. § 15152(b). In this case, this "future related development" is to take place on 47.3 acres of the total of 2 million square feet to be originally used for construction staging. Despite the scope of the area involved, and despite that neither the uses envisioned for this area, nor their impacts are described or analyzed with any specificity.

Therefore, it is entirely possible to provide more analysis on, among others, the parameters of air quality and traffic impacts by referring to and relying on the zoning designations for the areas covered by the "future related development." That the DEIR does little more than dismiss those impacts, stating that they will be analyzed at a future date when that aspect of the Project is analyzed under a Program EIR, understates the full impacts of the Project, and, thus, renders the DEIR inadequate.

**Response:** As stated on page 2-188 in Chapter 2, Description of the Proposed Project, of the Draft EIR, the proposed Project would require changes to the configuration and use of existing parcels owned by LAWA where the new LAX ground transportation facilities are proposed to be constructed. Associated changes to the existing land use and zoning designations are proposed, as further discussed in Section 2.8 of the Draft EIR. These changes would create new parcels owned by LAWA that would be needed for construction laydown and staging areas during construction of the proposed Project until completion of Phase 1, but would be later available for future development following the construction period. The parcels proposed for future related

development are located adjacent to the CONRAC, ITF East, APM MSF, and ITF West, and are shown on Figure 2-51 of the Draft EIR.

As discussed on page 2-188 of the Draft EIR, LAWA has no specific plans for development of these parcels at this time. Thus, the potential for environmental effects from future development of these parcels was examined at a programmatic level in this EIR. Development of these areas would occur, if at all, after construction of the proposed components of the Project. At such time as individual development projects are proposed on these parcels, additional CEQA project-level environmental review would be conducted, as necessary.

Contrary to the commentor's assertion, the Draft EIR identified potential uses and development of these parcels, as shown on page 2-191 of Chapter 2, Description of the Proposed Project, of the Draft EIR. LAWA assumed that these parcels would accommodate up to 900,000 sq. ft. of commercial development. Such future development is envisioned to support the needs of passengers, visitors, employees, and guests of hotels in the area. In the CONRAC area, the land located between W. 98th Street and W. Century Boulevard (Sites 7 and 8) and the land located on the corner of Aviation Boulevard and W. Arbor Vitae Street (Site 9) would be available after construction of the Project facilities is completed. For purposes of analysis, the Draft EIR projects and analyzes up to 450,000 sq. ft. of commercial development in these areas. In addition, the areas located south of the ITF West along W. 98th Street (Sites 1 and 2) and along Airport Boulevard (Sites 3, 4 and 5) would be available for future development, as would portions of the Belford area located south of W. 96th Street (Site 6). For purposes of analysis, the Draft EIR projects and analyzes up to 450,000 sq. ft. of commercial development in this area.

LAWA has developed land use designations (see Section 2.8 of the Draft EIR) and design guidelines (see Appendix B of the Draft EIR) to guide the future development of these parcels. Areas along W. Century Boulevard and Airport Boulevard would be developed consistent with commercial uses by providing services to meet the needs of Airport passengers and visitors, as well as guests of the nearby hotels on W. Century Boulevard. The portion of the Belford area south of W. 96th Street and the area between W. 96th Street and W. Arbor Vitae Street would be available to provide Airport-related support uses or commercial development. LAWA prepared an illustrative, conceptual plan for future development in consultation with local stakeholders and generated projections regarding the size and type of the potential future related development, as shown in Table 2-16 of the Draft EIR. As discussed on page 2-191 of the Draft EIR, other possible amenities could include: theaters; health and fitness centers; layover facilities; galleries or museums; or community uses.

As stated on page 4-4 in Chapter 4, Environmental Impact Analysis, of the Draft EIR, Section 15146(b) of the State CEQA Guidelines, states that an EIR prepared for program level entitlements, "need not be as detailed as an EIR on the specific construction projects that might follow." The State CEQA Guidelines incorporate the "rule of reason" and advise public agencies to avoid "speculative analysis of environmental consequences for future and unspecified development" that has not yet been formulated at greater levels of detail. (Discussion following CEQA Guidelines Section 15146.) Analyzing the impacts of potential future related development at a programmatic level of detail allows a lead agency to "consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." (State CEQA Guidelines Section 15168(b)(4).) If and when future development is proposed within these parcels, those proposals will be evaluated as appropriate in compliance with CEQA. It would be speculative at this time to provide greater detail on or analysis of the potential future development of these parcels.

Each section in Chapter 4 of the Draft EIR includes both a project-level analysis of the LAX Landside Access Modernization Program and a program-level analysis of the LAX Landside

Access Modernization Program Potential Future Related Development that describes and analyzes the effects associated with the potential future related development based on the assumptions for development of these parcels, in compliance with CEQA.

**LAMP-AL00006-3**

**Comment:** III. THE PURPOSE OF THE PROJECT IS OBVIATED BY ITS SIGNIFICANT TRAFFIC IMPACTS

While the stated purpose of the Project is, among other things, to "improv[e] the efficiency and operation of the surface transportation system which LAX operates," DEIR, § 1.l.3(d), that purpose is belied by the DEIR's conclusions. Specifically, the DEIR concludes that traffic improvements, even without reference to the 900,000 square feet of "future related development," *see, e.g.,* DEIR, § 1.4.2, Table 1-3, contemplated to be added to the Project for buildout by 2035, will cause significant traffic impacts to certain intersections in 2024, without mitigation, and in 2035, even with appropriate mitigation. *Id*. Moreover, the DEIR further concludes that inclusion of the "future related development" will create significant impacts both with and without mitigation during both time periods.

**Response:** The comment implies that the proposed Project is inconsistent with the project objectives because there would be significant impacts associated with traffic. This assertion is incorrect; it ignores: 1) the proposed Project's consistency with numerous other project objectives and goals, 2) operating conditions at numerous intersections would be improved, and 3) LAWA's proposed mitigation measures for significantly impacted intersections.

Section 2.2 of the Draft EIR provides the following description of the purpose, objectives and goals of the proposed Project:

"The underlying purposes of the proposed Project are to improve access to LAX and relieve congestion on Airport and surrounding roadways. The Project objectives for the LAX Landside Access Modernization Program that support the underlying purposes are:

(a) Enhance the passenger experience by providing new access options for all modes of travel, including direct connections to transit, convenient parking, and commercial vehicles;

(b) Provide easier and more efficient access to rental cars and non-CTA parking facilities;

(c) Relieve congestion at LAX and on the surrounding street system by developing a flexible transportation system that provides alternatives to the CTA for passengers, airport and other employees, and airport-related vendors accessing LAX;

(d) Promote the sustainability of LAX by improving the efficiency and operation of the surface transportation system in which LAX operates;

(e) Enhance and integrate the overall design of LAX Landside Access Modernization Program facilities with existing CTA structures and new airport facilities both inside and outside the CTA;

(f) Maintain airport operations during construction; and

(g) Ensure the highest and best use for reuse of any potential future surplus property in compliance with FAA grant obligations.

These objectives are consistent with the following general goals LAWA has established for LAX as part of its sustainability program and policies that strive to minimize the impact of LAX operations on the surrounding communities:

- Build new efficient transportation facilities that conserve energy, water, and other resources.
- Reduce traffic congestion and vehicle miles traveled, thereby improving air quality.
- Reduce air emissions from transportation sources to comply with Senate Bill (SB) 375.
- Design and construct the new transportation facilities in a manner that minimizes disruptions to airport operations.
- Design and construct the new transportation facilities in a manner that integrates with existing and new airport facilities.
- Utilize airport property located next to the new transportation facilities for construction staging, construction activities, and/or temporary relocation areas to build the APM System, CONRAC, ITFs, roadway improvements, and other Project elements. Upon completion of the new transportation facilities, consider new uses complementary to LAX and the surrounding uses that meet the needs of passengers, visitors, employees, and guests of hotels in the area.
- Generate additional employment opportunities and economic activity that benefit the communities located around LAX and the City of Los Angeles."

The proposed Project, including the APM system, CONRAC, ITFs and roadway improvements, would achieve these objectives and goals. Further, the proposed Project would provide a direct and seamless mass-transit connection to regional transit (Metro Crenshaw/LAX Line at the Airport Metro Connector (AMC) 96th Street Transit Station).

The provision of facilities such as the CONRAC and the ITF East within the Manchester Square area adjacent to the I-405 freeway and several arterial roadways would consolidate the traffic that currently is spread out throughout the neighborhoods and then transport these passengers, visitors and employees to and from the CTA using a time-certain mass transit (APM) system. The ITF West would consolidate both the shuttles and private vehicles and connect them to the same APM system to and from the CTA.

As indicated in Draft EIR Section 14.12.2.7 and Appendix O, Off-Airport Traffic Study, of the Draft EIR, relative to the Future (2035) With Project and Future (2035) With Project and Potential Future Related Development scenarios, the following information is relevant:

- The proposed Project with mitigation would improve system-wide traffic operating conditions during both AM and PM peak hours and many of the congested intersections would be improved. Intersection operations would be improved at 34 locations in the a.m. peak hours and at 42 intersections during the p.m. peak hours compared to future (2035) baseline conditions without the proposed Project (see Table 4.12.2-20 in Section 4.12.2 of the Draft EIR, and pages 9-10 of Appendix O, Off-Airport Traffic Study, of the Draft EIR, as well as Table 37A on pages 348-354 and Figures 76A and 76B on pages 410-411).
- The proposed Project with Potential Future Related Development with mitigation would improve the system-wide operations during both the a.m. and p.m. peak hours in the future (2035) conditions. Intersection operations would be improved at 32 intersections during the a.m. peak hours and at 35 intersections during the p.m. peak hours compared to future (2035) baseline conditions without the proposed Project (see Table 4.12.2-31 of the Draft EIR, and pages 9-10 of Appendix O, Off-Airport Traffic Study, of the Draft EIR, as well as

Table 40A on pages 359-365 and Figures 82A and 82B on pages 424-425).

Due to the consolidation of these trips adjacent to the I-405 and adjacent arterials such as La Cienega Boulevard, Arbor Vitae Street and Century Boulevard, certain intersections and freeway segments along these corridors would experience significant and cumulatively significantly impacts under various future conditions as noted in Sections 4.12.2.7.1 (With Project) and 4.12.2.7.2 (With Project and Potential Future Related Development) of the Draft EIR.

To address these significant and cumulatively considerable traffic impacts, LAWA has proposed a detailed mitigation program as detailed in Section 4.12.2.9 of the Draft EIR. With the implementation of these mitigation measures, as noted in Section 4.12.2.10.1 and Section 4.12.2.10.2, all significant impacts at intersections would be mitigated to less than significant levels using both existing baseline and future baseline (2024) conditions. However, in future (2035) With Project and future (2035) With Project and Potential Future Related Development scenarios, all significant impacts at intersections, except one would be mitigated to less than significant levels. Impacts on the La Cienega Boulevard at Arbor Vitae Street intersection would be reduced, but not to less than significant levels. In order to mitigate the impact at this intersection to less than significant levels, additional right-of-way within the City of Inglewood would be required, and the City of Inglewood expressed its intent in meetings with LAWA staff not to widen the intersection given the residential uses east of the I-405 freeway along Arbor Vitae Street. Therefore, working closely with Inglewood, LAWA proposed ITS improvements along La Cienega Boulevard (including the intersection of La Cienega Boulevard and Arbor Vitae) and along Century Boulevard (Mitigation Measure MM-ST (LAMP)-7); this mitigation measure would further reduce the significant impact at the La Cienega Boulevard at Arbor Vitae Street intersection, but the impact would remain significant and unavoidable.

Therefore, overall the proposed Project with mitigation measures identified in Section 4.12.2.9 of the Draft EIR would meet the objectives supporting the stated objectives and goals, and would not result in Draft EIR's conclusions "belying" the stated purpose of the Project, as asserted in the comment.

**LAMP-AL00006-4**

**Comment:** The origin of these conclusions is clear. Not only does the Project Description include:

(1) dramatic changes to the alignment of streets and roadways; (2) new facilities for rental cars in the Consolidated Rental Car Facility ("CONRAC"), and for the similar consolidation of other modes of transportation in the Intermodal Transportation Facility ("ITF"), east of LAX; but also (3) new freeway interchanges leading to local streets that are already heavily traveled, such as La Cienega Boulevard and Arbor Vitae Street. In addition, Los Angeles Metropolitan Transit Authority ("Metro") is planning a "separate and independent" 96$^{th}$ Street Metro Station near the CONRAC which will also be a hub for parking of private cars and well as modes of public transportation.

**Response:** Please see Response to Comment LAMP-AL00006-3 above. Section 2.4.4 in Chapter 2, Description of the Proposed Project, of the Draft EIR describes the proposed roadway improvements, which are not "dramatic changes" in alignments. The majority of the roadway improvements are widening of existing streets within existing right-of-way. The purposes of these roadway improvements are to facilitate the shift of traffic from the CTA to the proposed new CONRAC and ITFs, and provide better access to the freeway system; the intent is to intercept passengers and employees and remove those vehicles from the Airport circulation system and surrounding streets to decrease traffic. The commentor incorrectly states that the proposed Project includes new freeway interchanges leading to local streets that are already heavily

traveled. Section 2.4.4 in Chapter 2, Description of the Proposed Project, of the Draft EIR identifies all of the roadway improvements included as part of the proposed Project; LAWA is not proposing any new freeway interchanges. Furthermore, the Draft EIR cumulative impacts analyses included consideration of the "Metro Crenshaw/LAX Transit Corridor and Stations" project, as noted on page 3-10 of the Draft EIR, which includes the "96th Street Metro Station near the CONRAC" referenced by the commentor. Please also see Response to Comments LAMP-AL00006-11 and LAMP-AL00007-11 for additional details.

**LAMP-AL00006-5**

**Comment:** A few specific areas of concern regarding traffic impacts are the use of a five percent Transportation Demand Management (TDM) reduction for employee related trips with no means of measuring the effectiveness of the TDM measures to see if they actually result in this reduction.

**Response:** The TDM Program mitigation measure, as described in Section 4.12.2.9.1 of the Draft EIR, includes preparation and conduct of an employee travel demand survey. Based on the results of the survey, design and implementation of an LAX TDM Program including formation of a Transportation Management Organization (TMO) would occur. The TDM Program could include choice of alternative transport, enhanced vanpool, carpool programs and provision of transit passes; and car-share and employee shuttle programs.

After 9 months of launching the TDM Program, LAWA would conduct another follow-up survey to ascertain the performance of the Program, pros and cons of the Program elements, and consider re-tooling the Program to maximize its effectiveness.

The performance or effectiveness of these measures used in the estimation of mitigation was 5 percent of the employee drive-alone trips – equivalent to a reduction of 200 peak hour employee drive-alone trips or 800 average daily one-way employee trips. These trip reduction estimates are very conservative and small, given all the elements of the robust TDM Program mitigation measure.

The past success of LAWA TDM measures is a predictor that the relatively modest 5 percent additional trip reduction target can easily be achieved. LAWA has a comprehensive rideshare and vanpool program available to all LAWA employees, which offers financial incentives and discounts to participating employees. As noted in the annual Sustainability Report,[1] LAWA's Rideshare Program has a 23 percent participation rate and saved more than 300,000 gallons of fuel in 2015. Additionally the U.S. Environmental Protection Agency (EPA) considers the LAWA program to be one of the most comprehensive programs offered by an employer in Southern California. It is part of the EPA's Best Workplaces for Commuters Program that distinguishes and provides national recognition to employers offering outstanding commuter benefits. In order to participate in this program, employers must meet the EPA's National Standard of Excellence in commuter benefits. As noted in the Sustainability Report, based on a study conducted by the Transportation Research Board in 2012, LAWA's voluntary rideshare program is the largest and most comprehensive airport employee rideshare program in the U.S. While this program is currently solely for LAWA employees, the proposed mitigation measure for the LAX Landside Access Modernization Program would expand participation to any Airport employee (TSA, airline, cargo, etc.).

Furthermore, it is legally infeasible to mandate ridesharing (e.g. vanpool, carpool). (See California Health and Safety Code Sections 40454, 40716, 40717.5, and 40717.9; *Merced Alliance for Responsible Growth v. City of Merced* (2012 Case No F062602) 2012 WL 5984917.) As discussed in *Merced*:

> The final EIR modified Mitigation Measure 4.2-2b to provide that "[t]he applicant shall implement design features and develop program incentives that discourage employees from commuting in single occupant vehicles … in order to reduce associated mobile-source emissions." [¶] The challengers argue that the city's interpretation of Health and Safety Code section 40717.9 is wrong. The statute provides: [¶] "(a) Notwithstanding Section 40454, 40457, 40717, 40717.1, or 40717.5, or any other provision of law, a district, congestion management agency, as defined in subdivision (b) of Section 65088.1 of the Government Code, or any other public agency shall not require an employer to implement an employee trip reduction program unless the program is expressly required by federal law and the elimination of the program will result in the imposition of federal sanctions, including, but not limited to, the loss of federal funds for transportation purposes. [¶] "(b) Nothing in this section shall preclude a public agency from regulating indirect sources in any manner that is not specifically prohibited by this section, where otherwise authorized by law." (Health and Safety. Code, Section 40717.9.)
>
> The challengers argue that this statute applies to local air districts but not cities and counties. They ignore the fact that the statute applies to "any other public agency," not just local air districts. The challengers also argue that the statute is only intended to prevent local air districts from adopting regulations of general application to existing businesses; it is not intended to prevent individual cities and counties from imposing requirements on individual employers. The language of the statute does support their interpretation. Health and Safety Code section 40717.9, subdivision (a), states, "any other public agency shall not require an employer to implement an employee trip reduction program unless the program is expressly required by federal law …." The final EIR reasonably interpreted the statute to mean that Merced, a lead agency, could not require Wal-Mart, an employer, to implement such a program. (See Remy et. al., Guide to CEQA (2006 ed.) p. 542 [Health and Safety. Code, Section 40717.9 "eliminates employee trip reduction programs as one of the types of mitigation that cities and counties can impose under CEQA for impacts on air quality and transportation facilities"].) [¶] In any event, the challengers have not shown that the city's modification of the mitigation measure is a violation of CEQA.…The respondents point out that the final EIR concluded that implementation of another mitigation measure—an emission-reduction agreement with the SJVAPCD—would reduce NOx and PM10 emissions to less-than significant levels.

However, as discussed by the Court of Appeal, "A public agency can make reasonable assumptions based on substantial evidence about future conditions without guaranteeing that those assumptions will remain true. (Pub. Resources Code, § 21080, subd. (e); *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 412.) The City made reasonable assumptions regarding the efficacy of the TDM measures as outlined above.

[1] City of Los Angeles, Los Angeles World Airports, Los Angeles World Airports Sustainability Report 2015, Available: http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf.

**LAMP-AL00006-6**

**Comment:** Additionally, the traffic study identifies the existing Level of Service (LOS) of the Sepulveda Boulevard and Centinela Avenue intersection as C in the AM and E in the PM. A 2016 traffic study for another project in the vicinity showed a LOS of E in both the AM and PM for the same intersection. Therefore the analysis of this intersection understates the potential impact. In fact Table 40A suggests the intersection will see a reduced level of service for the "with

project" condition which could in fact result in an impact if the proper baseline condition of LOS E AM and PM is used.

**Response:** At certain locations, traffic counts on different days show variation equivalent to approximately 10 percent or more. The traffic counts that were utilized for the Traffic Study at the Sepulveda Boulevard/Centinela Avenue intersection were an appropriate CEQA baseline because they were conducted at the time of release of the Notice of Preparation (NOP) of the Draft EIR for the proposed Project (February 2015). The commentor is referring to counts and analysis conducted approximately a year or more after the release of the NOP and without providing any specific reference or context to those counts.

Notwithstanding the reasons for the differences, to respond to this comment an additional traffic impact analysis at the intersection of Sepulveda Boulevard and Centinela Avenue was conducted utilizing increased counts provided by Culver City. The results of that analysis showed that significance of impacts at this location remained unchanged for all scenarios. In other words, even with more recent traffic counts at this location, there would be no significant traffic impacts in Baseline With Project, Future (2024) With Project, Future (2035) With Project and Future (2035) With Project and Potential Future Related Development scenarios. Furthermore, the Draft EIR provided multiple cumulative scenarios in the years 2024 and 2035. (Draft EIR Section 4.12.) While the commentor appears to be requesting an analysis for the year 2016, an EIR is not required to analyze multiple interim years. *City of Irvine v. County of Orange* (2015) 238 Cal.App.4th 526.

**LAMP-AL00006-7**

**Comment:** Furthermore, the Project will add a significant amount of traffic to the Sepulveda Boulevard and Jefferson Boulevard corridors, two key arterial corridors in Culver City that provide access to the airport as alternate routes to using the 405 Freeway and on which Culver CityBus operates three (3) regular fixed route bus service and one (1) rapid bus line. DEIR Section 2.4.6.2.3, "Transportation System Management," briefly suggests the use of Intelligent Transportation System (ITS) improvements "along key north-south airport access routes which may include corridors through neighboring jurisdictions such as Culver City and El Segundo." The Project should include ITS improvements, such as Adaptive Traffic Control Systems (ATCS) and Bus Signal Priority (BSP), Closed-circuit Television (CCTV), and Changeable Message Signs (CMS), along the Sepulveda Boulevard and Jefferson Boulevard corridors to work closely in conjunction with the freeway corridor ITS systems and provide coordinated and improved regional and sub-regional access to the Los Angeles International Airport (LAX) and its associated facilities.

**Response:** The proposed Project is a transportation improvement project with provision of key consolidation facilities, an APM system and additional roadway improvements to improve the landside access and circulation system for Los Angeles International Airport. As indicated in Section 4.12.2.7 of the Draft EIR, the proposed Project would not cause significant traffic impacts at any of the City of Culver City intersection locations. However, the commentor's statement "DEIR Section 2.4.6.2.3, Transportation System Management," briefly suggests the use of Intelligent Transportation System (ITS) improvements "along the key north-south airport access routes which may include corridors through neighboring jurisdictions such as Culver City and El Segundo".

**LAMP-AL00006-8**

**Comment:** The Project DEIR did not analyze the Project's impacts to Culver CityBus service along Sepulveda Boulevard (Line 6 and Rapid 6) and Jefferson Boulevard (Lines 3 and 4). Given that the Project will add significant amount of traffic to these corridors and these bus lines

provide direct (Local 6 and Rapid 6) and indirect (Lines 3 and 4) access to Project area, the DEIR should analyze the Project's impacts to these bus lines.

**Response:** The commentor appears to be alleging delays to transit service due to concurrent use of the roadways by other vehicles (i.e. the commentor asserts "[t]he Project DEIR did not analyze the Project's impacts…[which] will add significant amount of traffic to these corridors…"

This concept was also expressly discussed in Section 4.12.2.3 of the Draft EIR, which explains in part "The model produces a.m. and p.m. peak period results; midday off-peak period results; vehicular *and transit flows* on the transportation network within the Study Area…" As also discussed by the Court of Appeal, "Under CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons." *Mira Mar Mobile Home Community v. City of Oceanside* (2004) 119 Cal.App. 4th 477,492. The Draft EIR appropriately discloses LOS impacts for all users of the roadways; it is unnecessary and infeasible to provide an individualized Level of Service analysis for every user of the roadways (which includes numerous hotel shuttles, limousines, personal vehicles, parking shuttles, taxis, etc.).

Furthermore, before the release of the Draft EIR, the EIR Project team coordinated with the City of Culver City staff on the assumptions, parameters and methodology to be used for the traffic impact analyses for the proposed Project. The scope of analysis, including intersection locations and criteria to be used for assessment of significant traffic impacts were also part of the Assumptions, Parameters and Methodology Memorandum prepared and coordinated at the commencement of the Traffic Study for the proposed Project.[1]

Section 4.12.2.7.1 and 4.12.2.7.2 of the Draft EIR present the impacts analyses for the LAX Landside Access Modernization Program Project and for the LAX Landside Access Modernization Program Potential Future Related Development, respectively. Forty (40) intersections within the City of Culver City (wholly or partially) were analyzed and significance of impacts identified as part of the traffic analyses. The Culver City Bus lines that the commentor is referring to traverse Sepulveda and Jefferson Boulevards within the City of Culver City and all key intersection locations along these corridors were analyzed as part of the Traffic Study. No significant traffic impacts were identified at any of the locations within the City of Culver City under Existing Baseline With Project, Future (2024) With Project, Future (2035) With Project and Future (2035) With Project and Potential Future Related Development scenarios, as described in detail in Section 4.12.2.7.1 and Section 4.12.2.7.2 of the Draft EIR. No other significance criteria have been adopted by the City of Culver City and noted in the City's Traffic Study Guidelines[2] that specifically address bus transit impacts beyond those detailed for roadway intersections upon which these bus lines traverse as referenced above.

[1] Raju Associates, Inc., Technical Memorandum Landside Access Modernization Program (LAMP) Project EIR Assumptions and Methodology for Traffic Study to the City of Culver City, December 1, 2015.

[2] City of Culver City, Public Works Department, Engineering Division and Community Development Department, Planning Division, Traffic Study Criteria for the Review of Proposed Development Projects within the City of Culver City, July 2012.

**LAMP-AL00006-9**

**Comment:** It should be noted that Sections 2.4.2.1.2, 2.4.2.2.2, and 2.4.3.1 indicated that the Project will build 8,000 parking spaces at ITF West, 8,300 parking spaces at ITF East, and 8,000 parking

spaces at CONRAC, totaling 24,300 parking spaces. The CONRAC includes both the customer service building, "the public hub of the CONRAC," and the employee and visitor parking structures. The total amount of parking provided for at the CONRAC, ITF West, and ITF East is indicative of the minimum number of cars that will access the airport through the surface streets proximate to the airport.

**Response:** Parking lots and parking spaces do not "create" traffic. The traffic generation associated with the CONRAC, ITF East and ITF West referenced in the comment was modeled and accounted for in the analyses of the alternatives, as presented in Table 4.12.2-7 (page 4.12-75) and Table 4.12.2-8 (page 4.12-76) in Section 4.12.2.2.5 of the Draft EIR. All the traffic accommodated by and associated with the parking lots and spaces referenced in the comment has been accounted for in the traffic forecasts and analyses of the various scenarios presented in the Draft EIR. The availability of parking at LAX has never been an accurate indicator of trip generation at LAX. The CTA parking has generally been in place since 1984. However, when LAX prepared to the Bradley West Final EIR in 2009, it noted that the CTA had an overall parking occupancy rate of 62 percent.[1] An analysis of parking demand completed in 2015 identified that even in peak periods at the Airport, there are available parking spaces within the CTA garages.[2]

Furthermore the commentor does not provide any references or discussion of the Draft EIR's detailed methodological discussion of the trip generation rates and methodology utilized. Contrary to the implications in the comment, the Draft EIR roadway traffic analysis accounts for all of the trips on the roadways associated with passenger activity levels under existing conditions as well as cumulative conditions in 2024 and 2035 based on the traffic model output identified in Sections 4.12.1.2.4 through 4.12.1.2.7, 4.12.1.8.2, 4.12.1.9, and 4.12.2.2.5. As noted in these sections, the vehicle trip generation and distribution model estimates future traffic volumes on the Airport's roadway system based on future passenger activities and has been calibrated and validated. Furthermore, the cumulative scenario utilized highly conservative assumptions, including an assumption of 2 percent annual ambient growth per year, and adding additional specific projects on top of that cumulative growth rate, as outlined in Section 4.12.3.2.4.

1 City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Bradley West Project, (SCH 2008121080), September 2009, Volume 8, Chapter 2, Comments and Responses, page 2-95.

2 Walker Parking Consultants, Public and Employee Parking Demand Analysis Draft Memorandum, August 4, 2015.

**LAMP-AL00006-10**

**Comment:** Additionally, in all this, there is no analysis of the synergistic traffic impacts of the Northside Project, planned contemporaneously for 2.3 million square feet of office and retail space immediately to the north and east of LAX, and only passing reference to an additional 900,000 square feet of "future related development" being made available by the development of the CONRAC and ITF.

**Response:** Please see Responses to Comments LAMP-AL00002-8 and LAMP-AL00006-2 regarding the program-level analysis of the LAX Landside Access Modernization Program Potential Future Related Development that describes and analyzes the effects, including the traffic impacts, associated with the potential future related development based on the assumptions for development of these parcels, in compliance with CEQA. As identified in Table 3-1 on page 3-11 of Chapter 3, Overview of Project Setting, of the Draft EIR, the LAX Northside Development was identified as a project that could, in conjunction with the proposed Project, result in cumulative

impacts to the environment. Page 115 of Appendix O, Off-Airport Traffic Study, of the Draft EIR, specifically notes that the land use and socio-economic data for the LAX Northside was used as input to the traffic model. There is no evidence of how the LAX Northside and the proposed Project could interact to “synergistically” create even more traffic than that generated by the demographic, land use, and passenger forecasts already incorporated in the Draft EIR traffic model.

All scenarios in Future (2024) and Future (2035) conditions with and without the Project and Potential Future Related Development include all projected traffic associated with the LAX Northside Development Project. Additionally, the cumulative effects of all of the cumulative projects, including LAX Northside Development, were included in the Future with Project (2024 and 2035) traffic impact analyses presented Section 4.12.2.7 of the Draft EIR.

**LAMP-AL00006-11**

**Comment:** In short, the DEIR minimizes both the projects themselves and their impacts. The new Metro facility, and "future related development" should at least be analyzed, at minimum, as "cumulative impacts" ["The project's incremental effects viewed in connection with the effects of past projects, the effect of other current projects and the effect of probable future projects." 14 Cal. Code Regs. § 15065(a)(3)]. Instead, the DEIR's approach is facilitated by the superficial program level of environmental review accorded to the almost 1 million square feet of "future related development" ultimately planned for the Project area. Insofar as the planning area is constrained by zoning, and given the CEQA requirement that even "program" level analyses be studied with the greatest specificity possible, it is both necessary and appropriate to analyze the potential impacts of committed levels of allowable uses within the area allocated to "future related development," without which the DEIR is notably deficient. Nevertheless, and despite the looming prospect of additional, potentially significant traffic impacts on already impacted surrounding streets, intersections, and freeway on-ramps, the DEIR persists in categorizing the Project's surface traffic impacts as "insignificant."

**Response:** As explained in Response to Comment LAMP-AL00006-2, each section in Chapter 4 of the Draft EIR includes both a project-level analysis of the LAX Landside Access Modernization Program and a program-level analysis of the LAX Landside Access Modernization Program Potential Future Related Development that describes and analyzes the effects associated with the potential future related development based on the assumptions for development of these parcels, in compliance with CEQA.

As identified in Table 3-1 on page 3-10 of Chapter 3, Overview of Project Setting, of the Draft EIR, the Metro Crenshaw/LAX Transit Corridor and Stations[1] projects were identified as projects that could, in conjunction with the proposed Project, result in cumulative impacts to the environment. Cumulative impacts of the proposed Project and other development projects within the vicinity of LAX are discussed within each environmental resource section in Chapter 4, Environmental Impact Analysis, of the EIR.

Finally, the amendments to the LAX Plan and LAX Specific Plan (see Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR) include provisions to add a new land use area, the Airport Landside Support Area, specific to the parcels identified for potential future related development. Page 7-7 of Chapter 7 includes a description of the Airport Landside Support Area. Appendix D of the Draft EIR contains a mark-up copy of the proposed revisions to the LAX Specific Plan. Page 22 of Appendix D lists the proposed Development Standards for the Airport Landside Support Area, which states:

The Airport Landside Support Subarea is divided into two areas. Area 1 contains parcels located in proximity to Aviation Boulevard and Century Boulevard; Area 2 contains parcels located in proximity to Airport Boulevard.

1) The total floor area of all development within the Airport Landside Support Subarea shall not exceed 900,000 square feet.

2) The total floor area within Area 1 shall not exceed 600,000 square feet and the maximum allowable Floor Area Ratio (FAR) for a lot shall be 2.0.

3) The total floor area within Area 2 shall not exceed 600,000 square feet and the maximum allowable Floor Area Ratio (FAR) for a lot shall be 2.0.

Contrary to the commentor's assertion, the Draft EIR did analyze the reasonably foreseeable potential effects of the potential future related development consistent with the zoning proposed for these areas.

[1] As indicated in Response to Comment LAMP-AL00007-11, Project 9 information in Table 3-1 on page 3-10 of the Draft EIR and Figure 3-1 on page 3-13 of the Draft EIR have been revised to identify the Airport Metro Connector (AMC) 96th Street Transit Station as a separate project from the Metro Crenshaw/LAX Transit Project. Please see Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-AL00006-12**

**Comment:** IV. THE PURPOSE OF THE PROJECT IS SIMILARLY CONTRAVENED BY ITS AS YET UNANALYZED, BUT APPARENTLY SIGNIFICANT AIR QUALITY IMPACTS

The most prominent weakness of the LAMP air quality analysis is its omission to study the air quality impacts of both the airside and landside portions of the total redesign of the airport. Specifically, the LAMP DEIR attempts to single out only the landside portions of what was a complete (airside, terminal and landside) redesign of LAX, as documented in the Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study ("SPAS EIR"). The LAMP Project, however, is acknowledged to be an integral component of the larger SPAS project which, under accepted protocols of air quality analysis, must be evaluated in total. Most importantly, even though a North Airfield Improvement Project is listed as a reasonably foreseeable project in the LAMP DEIR, emissions from aircraft (and other airside and terminal emission sources) are not estimated, or included in the air quality analysis on the unsupported pretext that "the proposed project would not increase the number of flights or type of aircraft using the airfield because it affects only efficiency of the landside/roadway system and landside development . . ." LAMP DEIR, p. 4.2-10.

Allowing EIR review to proceed as structured in the DEIR would set a precedent for staggering improvement projects that would effectively defeat the environmental review process. If, for example, landside capacity can be increased without an environmental accounting of aircraft and terminal activity effects, then subsequent airside improvements will be facilitated, since the capacity enabling effects of a previous landside modification will have been "banked," or included in the baseline for the next project review. This process can continue ad infinitum with no environmental review ever being conducted on the full impacts of a given project component. One project will simply leapfrog on the back of another such that projects continue to grow while project reviews assume exactly the opposite about their emissions.

As a consequence, the DEIR fails to properly address the Project's air quality impacts in that it does not account for total airport emissions. This is because emissions from airside activities can substantially influence whether emissions from the LAMP project can cause or contribute to a violation of an ambient air quality standard *(i.e.,* influence a project's significance decision). Therefore, non-quantification can only be justified if such non-LAMP airport related emissions are properly accounted for in utilized air quality background concentrations.

**Response:** The commentor indicates that the air quality impact analysis of the Landside Access Modernization Program Draft EIR failed to analyze airside projects that were contemplated and analyzed in the LAX Specific Plan Amendment Study (SPAS) Final EIR, published in January 2013. However, the air quality impact analysis included in the LAX SPAS Final EIR included extensive programmatic analysis of multiple airside configurations, as well as multiple landside configurations – one of which was the basis of the currently proposed Landside Access Modernization Program Project (analyzed as Alternative 9 in the LAX SPAS EIR and ultimately selected by the Los Angeles City Council as part of the "Staff Recommended Alternative"). See Tables 4.2-13, 4.2-14, 4.2-15, and 4.2-16 in Section 4.2.6, Impacts Analysis, Section 4.2, Air Quality, of the SPAS Draft EIR. Thus, LAWA and the City have already analyzed, at a programmatic level, the air quality impacts of various options for airfield and landside components at LAX, including the SPAS Staff Recommended Alternative.

The Landside Access Modernization Program Draft EIR addresses a more refined, project-level design of the LAX SPAS Alternative 9 layout and systems. LAWA has not yet decided whether or how to proceed with the airside options programmatically analyzed in the LAX SPAS Final EIR. Therefore, it would not be appropriate or necessary under CEQA (i.e., it would be speculative) to assess airside options beyond what was already disclosed and analyzed in the LAX SPAS Final EIR, and what is included in the cumulative impacts analysis for the LAX Landside Access Modernization Program Draft EIR (see Table 3-1 in Chapter 3, Overview of Project Setting, of the Draft EIR). Furthermore, the SPAS airside options and the LAX Landside Access Modernization Program Project have independent utility: the LAX Landside Access Modernization Program Project can be successfully implemented regardless of the SPAS airside options, and does not rely on the SPAS airside options for its justification.

With regard to the future passenger levels at LAX, as explained in Section 6.3.2 of the Draft EIR, projected future increases in passenger activity levels, forecasted by the Southern California Association of Governments (SCAG) and the Federal Aviation Administration (FAA), are anticipated to be realized with or without the Landside Access Modernization Program. The proposed Project simply provides a more convenient, transit-oriented system to enter and exit the Airport. The long-range future impacts of regional activity, including those from passengers using LAX, were analyzed in the approved Final 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy and associated Program Environmental Impact Report (PEIR) published in April 2016. The air quality impact analysis in Section 4.2.1 of the Draft EIR included air travel passenger growth in the region up to 136.2 million annual passengers, with up to 96.6 million annual passengers flying to and from LAX.[1] Please also see Response to Comment LAMP-AL00008-2 regarding projected passenger and operations growth and capacity at LAX.

[1] Southern California Association of Governments, Final 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life, Aviation & Airport Ground Access Appendix, Adopted April 7, 2016.

**LAMP-AL00006-13**

**Comment:** This might be substantiated if background concentrations were obtained at an air quality monitor that was downstream of non-LAMP project airport related emissions sources, and upstream of LAMP activity. Such is not, however, the case for the background concentrations employed in the DEIR.

Specifically, for all emissions species except particulate matter ("PM"), background concentrations were taken from the southwest coastal Los Angeles County Monitoring Station on Hastings Avenue. This station is located approximately 2,000 feet to the north of the west end of the northernmost runway at LAX (Runway 6L/24R). This station is very likely to provide representative background concentrations onto which the effects of airport related emissions can be added, but that only holds true if all airport emissions are considered. The prevailing wind direction at LAX is from the west (off the ocean).[1] Therefore, most of LAX related emissions will be dispersed toward the east. Little of this dispersion will influence readings of the Hastings location and this is precisely why the monitor serves as a reasonable background monitor for the airport as a whole.

What the monitor is not, however, is a reasonable source of background information for portions of the airport that are downwind of other, unaccounted for, airport emission sources. Yet that is precisely what the DEIR is assuming. The DEIR makes no effort to account for airside and terminal related emissions that occur upstream of the LAMP Project. These emissions will substantially influence air quality concentrations east of their release points. Since these emissions are not generally reflected in the background concentrations added to the Project's modeled dispersion effects, they are entirely absent from the estimated air quality concentrations. As a result, it is impossible, using the methodology currently employed in the DEIR, to accurately determine the potential significance of the LAMP Project on air quality.

[1] The DEIR does not present any summary of the meteorological data used for the dispersion modeling (most importantly wind speed and direction data). However, previous EIR analyses have provided information on prevailing wind directional data and that information is consistent with qualitative statements included in the DEIR. See, for example, "the location tends to produce a regular daily reversal of wind direction; onshore (from the west) during the day and offshore (from the east) at night." DEIR, p. 4.2-19.

**Response:** The comment assumes that the peak measured concentrations obtained from the LAX Hastings monitoring site do not include contributions from Airport sources. The background concentrations are presented in Table 4.2.1-3 on page 4.2-26 of the Draft EIR, and included in the ambient concentration impacts summarized in Tables 4.2.1-8 (page 4.2-35), 4.2.1-14 (page 4.2-41), 4.2.1-15 (page 4.2-42), 4.2.1-16 (page 4.2-44), 4.2.1-17 (page 4.2-45), and 4.2.1-19 (page 4.2-47) of the Draft EIR. The assumption that Airport sources are not included in these background values is incorrect. The peak background concentrations for the 1-hour CO, $NO_2$, and $SO_2$ concentrations, as well as 8-hour CO concentrations are presented below in Table 1. Also shown in this table are the wind directions for the hours that produced these peak background concentrations. The peak concentrations used as background in the air quality impact analysis include contributions from sources that were located northeast, east, southeast and south of the LAX Hastings monitoring station. The sources in those directions include motor vehicles on streets such as Westchester Parkway, Lincoln Boulevard, Sepulveda Boulevard, and the I-405 Freeway, as well as aircraft, ground support equipment and motor vehicles operating at LAX. The Airport and local roadway sources were included in the peak background concentrations

used in the air quality impact analysis presented in the Draft EIR. Therefore, the air quality impact analysis presented in Section 4.2.1 and Appendix F of the Draft EIR correctly estimates the potential significance of the LAX Landside Access Modernization Program Project on air quality.

Furthermore, the methodology employed is consistent with the guidance provided by SCAQMD's CEQA handbook, which explains "Baseline information for the local air quality analysis should include information obtained from the nearest or most appropriate District air quality monitoring station…" As discussed on Draft EIR page 4.2-24:

> The monitoring station that is most representative of existing air quality conditions in the Project area is the Southwest Coastal Los Angeles Monitoring Station located at 7201 W. Westchester Parkway (referred to as the LAX Hastings site), less than 0.5-mile from Runway 6L-24R (northernmost LAX runway). Criteria pollutants monitoring at this station include $O_3$, CO, $SO_2$, $NO_2$, and $PM_{10}$. The nearest representative monitoring station that monitors $PM_{2.5}$ is the South Coastal Los Angeles County 1 Station, which is located 1305 E. Pacific Coast Highway (Long Beach).

Regarding the commentor's assertion in FN1 that "The DEIR does not present any summary of the meteorological data used," page 4,2-19 of the Draft EIR went on to provide the meteorological summary requested by the commentor, which explained:

> The annual minimum mean, maximum mean, and overall mean temperatures at the airport are 56 degrees Fahrenheit (°F), 70°F, and 63°F, respectively. The prevailing wind direction at the airport is from the west-southwest with an average wind speed of roughly 6.4 knots (7.4 miles per hour [mph] or 3.3 meters per second [m/s]). Maximum recorded gusts range from 27 knots (31 mph or 13.9 m/s) in July to 56 knots (64 mph or 28.6 m/s) in March. The monthly average wind speeds range from 5.3 knots (6.1 mph or 2.7 m/s) in November to 7.6 knots (8.7 mph or 3.9 m/s) in April.[39]
>
> FN[39] Western Regional Climate Center, Los Angeles International Airport (KLAX), CA Climatological Summary, Period of Record: Jul 1996 to Dec 2008, Available: http//www.wrcc.dri.edu/summary/lax.ca.html, accessed August 1, 2016.

Draft EIR page 4.2-33 noted that "Details on modeling inputs, assumptions, and impact results are included in Appendix F." The input and output air quality files are available for review at LAWA Environmental Programs Group, One World Way, Room 218, Los Angeles California, 90045.

**Table 1**

**Peak Background Concentration & Corresponding Wind Direction**

| Pollutant | Averaging Period | Measurement | Year | Month | Day | Hour | Wind Direction | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | Degrees | Compass |
| CO | 1-Hour | 3.1 ppm | 2013 | 1 | 9 | 8 | 98 | E |
| | | | | 1 | 9 | 4 | 63 | ENE |
| | | | | 1 | 9 | 5 | 55 | NE |
| | | | | 1 | 9 | 6 | 116 | ESE |
| CO | 8-Hour | 2.5 ppm | 2013 | 1 | 9 | 7 | 75 | ENE |
| | | | | 1 | 9 | 8 | 98 | E |
| | | | | 1 | 9 | 9 | 106 | ESE |
| | | | | 1 | 9 | 10 | 111 | ESE |
| | | | | 1 | 9 | 11 | 183 | S |
| $NO_2$ | 1-Hour CAAQS | 0.087 ppm | 2014 | 11 | 5 | 8 | 126 | SE |
| $NO_2$ | 1-Hour CAAQS | 0.087 ppm | 2015 | 1 | 25 | 9 | 107 | ESE |
| $NO_2$ | 1-Hour NAAQS | 0.066 ppm | 2014 | 4 | 30 | 22 | 124 | SE |
| $SO_2$ | 1-Hour CAAQS | 0.015 ppm | 2014 | 1 | 14 | 8 | 112 | ESE |
| $SO_2$ | 1-Hour CAAQS | 0.015 ppm | 2015 | 1 | 25 | 9 | 107 | ESE |
| $SO_2$ | 1-Hour NAAQS | 0.006 ppm | 2013 | 1 | 2 | 9 | 85 | E |

Source: National Oceanic and Atmospheric Administration. National Centers for Environmental Information – Land-Based Station Data. Available at https://www.ncdc.noaa.gov/data-access/land-based-station-data. Last accessed December 20, 2016.

**LAMP-AL00006-14**

**Comment:** Further, the importance of ensuring that all airport emissions are considered is magnified by the fact the LAMP Project will relocate a portion of airport emissions much closer to the airport boundary with surrounding communities. The incremental effects of this movement is presumably captured in the Landside air quality analysis performed for the DEIR, but it is not possible to ascertain how this increment will affect overall National Ambient Air Quality Standards/California Ambient Air Quality Standards ("NAAQS/CAAQS") compliance in the absence of a full accounting of airport emissions.

**Response:** The comment is similar to comment LAMP-AL00006-13 and the response to that comment, above, is responsive to this comment. The LAX Landside Access Modernization Program Draft EIR examined all emissions related to the proposed Project, specifically, construction emissions associated with implementation of the proposed Project, and operational emissions associated with the proposed new facilities (APM, CONRAC, ITF West, ITF East, and associated roadway improvements. The proposed LAX Landside Access Modernization Program would result in a shift of ground vehicle traffic from the CTA to the proposed facilities; all of the emissions associated with this shift in traffic are analyzed and reported in the Draft EIR. A “full accounting of airport emissions” is not necessary to understand the proposed Project’s incremental impacts on air quality standards compliance because the proposed LAX Landside Access Modernization Program would have no effect on any other source of Airport emissions as it would not change any airfield components, would not alter or change any aircraft departure or arrival routes or procedures, or in any way affect the operation of airfield vehicles and aircraft ground support equipment. The air pollutant dispersion analyses conducted in the Draft EIR, when combined with the background concentrations, show that NAAQS and CAAQS ambient standards would not be exceeded in areas near Project construction or operations, including those where Airport landside activity would shift to the east.

**LAMP-AL00006-15**

**Comment:** In addition, the DEIR does not appear to have adequately estimated the contribution of emissions from the 900,000 square feet of "future related development" as set forth above,

this future related development is to take place on 47.3 acres (2 million square feet) of land used for LAMP construction staging. The rationale for allocating only half the available acreage to future development is unclear, which is yet another symptom of the defects in the DEIR caused by the failure to analyze the impacts of "future related development," at least at a program level, coincidently with the LAMP Project DEIR.

**Response:** As noted in Response to Comment LAMP-AL00006-2, each section in Chapter 4 – including Air Quality - includes both a project-level analysis of the LAX Landside Access Modernization Program and a program-level analysis of the LAX Landside Access Modernization Program Potential Future Related Development that describes and analyzes the effects associated with the potential future related development based on the assumptions for development of these parcels, in compliance with CEQA.

As noted in Response to Comment LAMP-AL00006-11, the Draft EIR did analyze the reasonably foreseeable potential effects of the potential future related development consistent with the zoning proposed for these areas.

**LAMP-AL00006-16**

**Comment:** Finally, the DEIR improperly dismisses Sulfate in its analysis of secondary pollutants. DEIR, p. 4.2-2. The definition of Sulfate stated in the DEIR is correct, but its dismissal is incorrect. Sulfur, emitted as Sulfur Dioxide ("S02"), reacts in the atmosphere to form Sulfate, which is a significant contributor to total PM, PM10 and PM2.5. Nitrogen, emitted as Nitrous Oxide ("NOx") undergoes similar post emission secondary reactions to form particulate nitrates. Ignoring secondary Sulfate and Nitrate formation will underestimate all PM impacts. The DEIR itself notes the importance of secondary PM formation on page 4.2-4, but does not appear to note the inconsistency of this correct recognition with the decision not to estimate such impacts.

While the Southern California Air Quality Management District ("SCAQMD") CEQA Guidelines significance thresholds appear to allow consideration of emitted PM2.5 only, "Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds," October 2006, the specific wording of the guidance is "staff's recommendation for calculating PM2.5 focuses only on directly emitted PM2.5." [Emphasis added.] This statement is merely a recommendation, and does not provide sufficient specificity to determine whether the guidance does not cover the estimation of Sulfate and Nitrate PM (the guidance does include a specific methodology to estimate emitted PM2.5), or whether such estimation is not required. In the spirit anticipated by the legislature and the Guidelines, in the face of such uncertainty, it is incumbent upon Los Angeles World Airports ("LAWA") to perform the most complete and specific study available under existing methodologies. The DEIR does not reflect this mandate in its analysis of Sulfate.

**Response:** The commentor notes that the air quality impact analysis of the LAX Landside Access Modernization Program Draft EIR failed to analyze the impact of Project-related sulfate emissions on particulate matter (PM) emissions. Sulfate emissions from the LAX Landside Access Modernization Program Project would be due to the combustion of diesel and gasoline fuels that contain trace amounts of sulfur; however, the directly emitted pollutant from this process is sulfur dioxide ($SO_2$), not sulfate. Sulfate, similar to ozone, is a regional pollutant created in the atmosphere through a complex process of photochemical reactions, which result in the conversion of $SO_2$ to sulfate. Thus, sulfate is not a directly emitted contributer to PM, but a secondary pollutant formed in the atmosphere from the precursor pollutant $SO_2$. Note, however, that there are other, non-Project sources of both PM and sulfate, including sea-spray particles

generated along the coast next to LAX, which would be captured and reflected in the air quality monitoring data collected by the Southwest Coastal Los Angeles Monitoring Station located at 7201 W. Westchester Parkway (referred to as the LAX Hastings site). Criteria pollutants monitoring at this station include $O_3$, CO, $SO_2$, $NO_2$, and $PM_{10}$. The commentor also recognizes that the SCAQMD staff recommended guidance[1] for assessing localized impacts focuses on directly emitted $PM_{2.5}$ (therefore does not include secondary PM pollutants). It should also be noted that the comment offers no evidence that any impacts of the proposed Project on sulfates would be significant.

One of the reasons sulfate is not included in local concentration impact analyses is that the conversion of $SO_2$ to sulfate in the atmosphere is relatively slow, especially during dry ambient conditions.[2] Oxidation rates of $SO_2$ are typically 1 to 5 percent per hour,[3] indicating that the directly emitted Project-related $SO_2$ would be quite some distance downwind of the Project site before much sulfate is formed. For example, at an average wind speed of 7.4 miles per hour,[4] the LAX Landside Access Modernization Program Project construction-related $SO_2$ would be at least 15 miles and potentially up to 74 miles from the Airport before 10 percent of the $SO_2$ was converted to sulfate. This is well beyond the local concentration impact zone around the Airport. Project-related pollutant concentrations at these distances from the Airport would be indistinguishable from background levels. The presence of fog increases the rate of sulfate production, but also increases the deposition removal rate of sulfate from the atmosphere.[3]

1 South Coast Air Quality Management District, Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006, Available: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significancethresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculationmethodology/final_pm2_5 methodology.pdf?sfvrsn =2, accessed November 12, 2015.

2 Godish, Thad, Air Quality, Lewis Publishers, Inc., Chelsea, MI., 1985, p. 28.

3 Seinfeld and Pandis, Atmospheric Chemistry and Physics – From Air Pollution to Climate Change, John Wiley & Sons, Inc., New York, 1998, p.1058.

4 Ruffner, J.A., Gale Research Company, Climates of the States: National Oceanic and Atmospheric Administration Narrative Summaries, Table, and Maps for Each State with Overview of State Climatologist Programs, Third Edition, Volume 1: Alabama-New Mexico, 1985, p. 126.

**LAMP-AL00006-17**

**Comment:** In the final analysis, the DEIR fails to analyze the joint impacts of operational and construction activities. Air quality impacts for construction are based on peak day emissions estimates, while operational impacts are assessed in both 2024 (completion of phase 1 construction) and 2035 (following the completion of phase 2). However, at least at some points between 2024 and 2035, both construction and operational activity will be occurring simultaneously. Nevertheless, the combined effects on air quality during this period are not analyzed in the DEIR.

**Response:** This comment is similar to Comment LAMP-AR00001-2. Please see Response to Comment LAMP-AR00001-2.

**LAMP-AL00006-18**

**Comment:** V. SUMMARY

While the LAMP Project offers some potential remedies for the surface traffic impacts that now burden access to LAX, on some parameters, the DEIR falls short. LAWA has not addressed potential attractants of traffic such as the "future related development," and potential emissions from that development and its traffic, when coupled with the capacity enhancing characteristics of the airside portion of the project, of which the LAMP Project is part and parcel. As a consequence, the serious impacts arising from the as yet unaddressed full development of the Project area remains similarly unanalyzed.

**Response:** As noted in Response to Comment LAMP-AL00006-2, each section in Chapter 4 includes both a project-level analysis of the LAX Landside Access Modernization Program and a program-level analysis of the LAX Landside Access Modernization Program Potential Future Related Development that describes and analyzes the effects associated with the potential future related development based on the assumptions for development of these parcels, in compliance with CEQA. The EIR also includes a thorough analysis of all cumulative impacts that would occur as a result of the proposed Project in combination with past, present and reasonably foreseeable future projects with the potential to impact the same resources as the proposed Project. Additionally, contrary to the commentor's assertion, the LAX Landside Access Modernization Program does not include any changes to the airside facilities at LAX, and would not enhance capacity of the Airport, as explained in Section 6.3.2 of the Draft EIR. Please also see Response to Comment LAMP-AL00008-2 regarding projected passenger and operations growth and capacity at LAX. The Draft EIR complies with CEQA by identifying and analyzing the effects of the LAX Landside Access Modernization Program, both at a project-level for the project components and at a program-level for the potential future related development.

**LAMP-AL00006-19**

**Comment:** Culver City looks forward to working with LAWA cooperatively toward full disclosure, analysis and complete mitigation of the apparent environmental impacts of the LAMP Project.

**Response:** The comment is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the LAX Landside Access Modernization Program.

## LAMP-AL00007 Carvajal, Elizabeth Los Angeles County Metropolitan Transportation Authority 11/15/2016

**LAMP-AL00007-1**

**Comment:** Thank you for the opportunity to comment on the proposed LAX Landside Access Modernization Project (LAMP). This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Over the past several years, both Metro and Los Angeles World Airports (LAWA) have worked closely to provide a connection between Metro's regional transit system and the Los Angeles International Airport (LAX). The proposed connection includes LAWA's Automated People Mover

(APM) System, which is planned as part of the LAMP. Metro and LAWA have been coordinating on parallel planning and development efforts for the Airport Metro Connector (AMC) 96th Street Transit Station and APM Station, respectively. Because both projects will be built in close proximity and during the same time period, successful completion of the projects requires both agencies to collaborate and coordinate with respect to the design and construction, as well as potential roadway improvements, utility relocations, on-site work and other new accommodations in the immediate vicinity of the AMC and APM Stations.

**Response:** The connection between the proposed Intermodal Transportation Facility (ITF) East Automated People Mover (APM) Station and the Los Angeles County Metropolitan Transportation Authority (Metro) proposed Airport Metro Connector (AMC) 96th Street Transit Station is discussed on page 2-90 and shown on Figure 2-31 in Chapter 2, Description of the Proposed Project, of the Draft EIR. LAWA is committed to working with Metro on the design and construction, as well as potential roadway improvements, utility relocations, on-site work and other issues related to the LAX Landside Access Modernization Program throughout design, construction, and implementation. LAWA thanks Metro for its continued support and interest in making a connection between LAWA's APM and Metro's AMC 96th Street Transit Station and will continue to coordinate with Metro to ensure that both projects are successful.

**LAMP-AL00007-2**

**Comment:** To ensure continued coordination and communication between the two agencies, Metro is providing the following comments on the LAWA's LAMP Draft Environmental Impact Report (DEIR):

- Design/Engineering Coordination of the APM Project: As a continuation of current coordination activities, LAWA and Metro are striving to develop a mutually agreeable design that seamlessly connects passengers between the APM Station and the AMC 96th Street Transit Station. Both agencies need to ensure that the APM guideway structure and support columns do not conflict with the construction or operation of Metro facilities, including the Crenshaw/LAX Transit Project, the AMC 96th Street Transit Station, and the Southwestern Maintenance Yard.

**Response:** The connection between the proposed ITF East APM Station and Metro's proposed AMC 96th Street Transit Station is discussed on page 2-90 and shown on Figure 2-31 in Chapter 2, Description of the Proposed Project, of the Draft EIR. LAWA is committed to working with Metro on this issue along with other issues related to the LAX Landside Access Modernization Program throughout design, construction, and implementation. LAWA is working closely with Metro on the preliminary design of the APM guideway structure and column placement to ensure that construction of the APM does not interfere with Metro's operation of the Crenshaw/LAX transit line, the AMC 96th Street Transit Station, or the Southwestern Maintenance Yard.

**LAMP-AL00007-3**

**Comment:** - Aviation Boulevard Roadway Improvements: The LAMP DEIR identifies roadway improvements along Aviation Boulevard between W. 98th Street and W. Arbor Vitae Street, including additional travel lanes, new driveways for LAWA's proposed Intermodal Transportation Facility East (ITF East), and Consolidated Rental Car Facility as well as a new signalized intersection. Both agencies need to coordinate on the final configurations of the new driveways, intersections, and traffic signal phasing.

**Response:** The plans for improvements along Aviation Boulevard are discussed on page 2-141 and shown on Figure 2-42, improvements for the ITF East are discussed on page 2-105 and shown on Figure 2-29, and improvements for the Consolidated Rental Car Facility are discussed on page 2-

126 and shown on Figure 2-37 in Chapter 2, Description of the Proposed Project, of the Draft EIR. LAWA has conducted several coordination meetings with Metro on the proposed improvements to Aviation Boulevard, particularly the locations of signalized intersections and driveways, and will continue to coordinate with Metro on these issues as well as traffic signal phasing throughout the design, construction, and implementation of both the LAX Landside Access Modernization Program and Metro's AMC 96th Street Transit Station.

**LAMP-AL00007-4**

**Comment:** - Multi-use Path on Aviation Boulevard: The LAMP DEIR identifies a 17' to 24' multi-use path on the west side of Aviation Boulevard between Arbor Aviate Street and 98th Street. Both agencies need to coordinate on the funding, design, and construction of this multi-use path and its integration with the AMC 96th Street Transit Station.

**Response:** The plans for the multi-use path improvements along Aviation Boulevard are discussed on page 2-139 through 2-142 in Chapter 2, Description of the Proposed Project, of the Draft EIR. LAWA has developed a cooperation protocol with Metro, conducted numerous coordination meetings with Metro on the proposed multi-use path along Aviation Boulevard and will continue to coordinate with Metro throughout the design, construction, and implementation of both the LAX Landside Access Modernization Program and Metro's AMC 96th Street Transit Station.

**LAMP-AL00007-5**

**Comment:** - Arbor Vitae Street: The LAMP DEIR proposes a right-turn lane on eastbound Arbor Vitae Street at Aviation Boulevard. Both agencies need to coordinate on the design and accommodation of this right-turn pocket to avoid impacts to the AMC 96th Street Transit Station.

**Response:** The plans for the right turn lane on eastbound W. Arbor Vitae Street at Aviation Boulevard are discussed in Section 2.4.4 of Chapter 2, Description of the Proposed Project, of the Draft EIR and provided in more detail on page 100 of Appendix O, Off-Airport Traffic Study. LAWA has developed a cooperation protocol with Metro, conducted numerous coordination meetings with Metro on the proposed improvements at the intersection of Aviation Boulevard and W. Arbor Vitae Street and will continue to coordinate with Metro throughout the design, construction, and implementation of both the LAX Landside Access Modernization Program and Metro's AMC 96th Street Transit Station.

**LAMP-AL00007-6**

**Comment:** - Demolition of LAX City Bus Center: For the enabling projects, the LAMP DEIR proposes demolishing the LAX City Bus Center and temporarily relocating most of this facility's primary functions to Metro's Aviation/Century Station on the Metro Crenshaw/LAX Line, currently under construction. In addition, other temporary relocation sites are also mentioned. As LAWA is aware, the new bus plaza planned as part of the AMC 96th Street Transit Station is intended to eventually replace the LAX City Bus Center. However, until the AMC 96th Street Transit Station is opened for passenger service, LAWA must work with Metro and other municipal bus operators to identify a temporary bus facility site that can accommodate the essential functions provided at the existing LAX City Bus Center. Furthermore, in order to ensure continuous, uninterrupted bus transit service within the LAX area, LAWA will need to coordinate with the bus transit operators, currently using the LAX City Bus Center, to ensure a seamless transition of services to this new temporary bus facility.

As the proposed bus plaza is now part of the AMC 96th Street Transit Station, the Crenshaw/LAX Transit Project will not be constructing a bus plaza previously considered for the Aviation/Century Station. As such, LAWA would need to identify and provide additional ROW near the

Aviation/Century Station to accommodate a temporary bus facility of comparable size to the existing LAX City Bus Center. Furthermore, if the LAX City Bus Center needs to be demolished and relocated prior to the opening of Metro's AMC 96th Street Transit Station, LAWA must coordinate with Metro on the construction of this temporary bus facility to avoid impacts to the construction or operation of the Aviation/Century Station, Metro Rail service and connecting bus service.

**Response:** The demolition of the LAX City Bus Center is discussed in Section 2.5.5 of Chapter 2, Description of the Proposed Project, of the Draft EIR. As discussed therein, the primary functions of this facility are proposed to be relocated adjacent to Metro's Aviation/Century Boulevard Station on the Metro Crenshaw/LAX Line, currently under construction, adjacent to the proposed Metro AMC 96th Street Transit Station. As shown in Chapter 3, Corrections and Additions of the Draft EIR, this language has been modified to state:

> While some public transit buses would continue to board/de-board passengers in the vicinity of the ITF West, the primary functions of this facility would be relocated adjacent to Metro's ~~Aviation/Century Boulevard Station on the Metro~~ Crenshaw/LAX Line, currently under construction, adjacent to the proposed Metro AMC 96th Street Transit Station.

Section 2.5.5 of the Draft EIR states that temporary bus facility sites for the LAX City Bus Center could include other portions of Lot C, Lot E, or to the area north of Century Boulevard and east of Aviation Boulevard that has been identified for construction staging and laydown. The demolition and temporary relocation of the LAX City Bus Center is currently planned to start in the second quarter of 2018 and be completed by the third quarter of 2019, as indicated on Table 2-15 of Chapter 2, Description of the Proposed Project, of the Draft EIR. LAWA will continue to coordinate with Metro throughout the design, construction, and implementation of both the LAX Landside Access Modernization Program and Metro's AMC 96th Street Transit Station and will coordinate with all affected bus line operators. LAWA is working with Metro to identify a suitable location for the temporary bus facility that will accommodate the essential functions provided at the existing LAX City Bus Center in order to help ensure bus transit service within the LAX area.

The original plans for the Metro Crenshaw/LAX Line called for a bus transit facility located adjacent to the Aviation/Century Boulevard Station currently under construction. LAWA now understands that those plans were abandoned and Metro did not acquire the right-of-way necessary to construct a bus facility at this location when it was decided to construct the Airport Metro Connector 96th Street Transit Station. As such, LAWA understands that the Aviation/Century Boulevard Station is an infeasible location for a temporary bus facility and has struck that language from the Draft EIR, as indicated above.

**LAMP-AL00007-7**

**Comment:** - W. 98th Street Extension between Aviation Boulevard and Bellanca Avenue: The construction of the 98th Street Extension may provide for the rerouting of bus transit service along W. 98th Street between the ITF West and the new AMC 96th Street Transit Station. As part of this improvement, please ensure that the design of the new signalized intersection at W. 98th Street and Aviation Boulevard will accommodate the turning movements of bus transit vehicles.

**Response:** The plans for the extension of W. 98th Street between Aviation Boulevard and Bellanca Avenue are discussed in Section 2.4.4 of Chapter 2, Description of the Proposed Project, of the Draft EIR and provided in more detail on page 98 of Appendix O, Off-Airport Traffic Study. LAWA has developed a cooperation protocol with Metro, conducted numerous coordination meetings with Metro on the proposed improvements associated with the extension of W. 98th Street and will continue to coordinate with Metro throughout the design, construction, and implementation of

both the LAX Landside Access Modernization Program and Metro's AMC 96th Street Transit Station. The proposed intersection at W. 98th Street and Aviation Boulevard would be designed to accommodate the turning movements of bus transit vehicles.

**LAMP-AL00007-8**

**Comment:** - Operational Options on W. 98th Street: For the segment between New A Street and Aviation Boulevard, LAWA should take into consideration the potential bus transit service planned for the ITF West and the new AMC 96th Street Transit Station.

**Response:** The operational options for W. 98th Street between Airport Boulevard and Bellanca Avenue are discussed in Section 4.12.2.7.5 of Chapter 4, Environmental Impacts, of the Draft EIR and provided in more detail in Appendix W, 98th Street Operational Options, of Appendix O, Off-Airport Traffic Study. LAWA has developed a cooperation protocol with Metro, conducted numerous coordination meetings with Metro on the proposed improvements associated with the extension of W. 98th Street and will continue to coordinate with Metro throughout the design, construction, and implementation of both the LAX Landside Access Modernization Program and Metro's Airport Metro Connector (AMC) 96th Street Transit Station. The analysis conducted by LAWA included consideration of bus transit routes between the ITF West and Metro's AMC 96th Street Transit Station.

**LAMP-AL00007-9**

**Comment:** - Revisions to the DEIR text:

- Table 2-8 on page 2-129 for Aviation Boulevard ROW – confirm multi-use path is included under sidewalk column (12' to 25' width). If it is, revise to 17' to 24'.

**Response:** The commentor is correct; the dimensions for the proposed Aviation Boulevard sidewalk should include the multi-use path. In response, Table 2-8 in Section 2.4.4 of the Draft EIR has been revised. Please see Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-AL00007-10**

**Comment:** - Show Southwestern Maintenance Yard as existing Metro property/future Metro facility on Figure 2-47 and all other relevant figures.

**Response:** Figure 2-47 has been updated to indicate that the location of the Southwestern Metro Yard is for future Metro facilities. Please see Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-AL00007-11**

**Comment:** - Table 3-1 on Page 3-10 – identify AMC Project as a separate project from the Metro Crenshaw/LAX Transit Project and stations with different dates/description.

**Response:** In response, Project 9 information in Table 3-1 on page 3-10 of the Draft EIR has been revised as shown below. In addition, Figure 3-1 on page 3-13 of the Draft EIR has been revised to reflect the revision to Table 3-1. Please see Chapter 3, Corrections and Additions to the Draft EIR.

| | | | |
|---|---|---|---|
| 9*a* | Metro Crenshaw/LAX Transit Corridor *Project* ~~and Stations~~ | Jan 2015 – ~~2024~~ *2019* | The Los Angeles County Metropolitan Transportation Authority (Metro) is constructing the Crenshaw/LAX Transit Corridor Project, which includes an 8.5-mile light-rail transit line that will connect the existing Metro Green Line and the Metro Expo Line at Crenshaw and Exposition Boulevards. *As part of this project,* ~~Two~~ *a* station~~s are~~ *is* being constructed in proximity to LAX~~, one~~ near the intersection of Century Boulevard and Aviation Boulevard~~, and another proposed station at 96th Street and Aviation Boulevard, the Airport Metro Connector~~. |
| *9b* | *Airport Metro Connector (AMC) 96th Street Transit Station* | *2020 - 2023* | *Metro will be constructing a new multi-modal transportation center at 96th Street and Aviation Boulevard to connect LAX to the regional bus and transit system. Components of the AMC Station include three at-grade light rail transit (LRT) platforms, bus plaza, bicycle hub, pedestrian plaza, passenger vehicle pick-up and drop-off area and Metro transit center/terminal building ("Metro Hub") to connect passengers between the multiple transportation modes.* |

**LAMP-AL00007-12**

**Comment:** - When referencing the Metro Rail lines at the AMC 96th Street Transit Station, include both the future Crenshaw/LAX Line as well as the Metro Green Line.

**Response:** References to the Metro Rail lines at the AMC 96th Street Transit Station have been clarified to include both the future Crenshaw/LAX Line as well as the Metro Green Line. Please see Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-AL00007-13**

**Comment:** Metro looks forward to continuing our cooperative, working relationship with LAWA on our respective projects. If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. Metro looks forward to reviewing the Final EIR. Please send it to the following address:

Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

**Response:** LAWA is committed to continuing its working relationship with Metro on the LAX Landside Access Modernization Program throughout design, construction, and implementation. LAWA thanks Metro for its continued support and interest in making a connection between LAWA's APM and Metro's AMC 96th Street Transit Station and will continue to coordinate with Metro to ensure that both projects are successful.

## LAMP-AL00008 Wolff, Osa — Shute, Mihaly & Weinberger LLP (City of El Segundo) 11/15/2016

**LAMP-AL00008-1**

**Comment:** On behalf of the City of El Segundo ("City"), we submit the following comments on the Draft Environmental Impact Report ("Draft EIR" or "DEIR") for the Landside Access Modernization Program ("LAMP" or "Project"). As Los Angeles World Airports ("LAWA") is aware, the City has a number of longstanding concerns related to Los Angeles International Airport ("LAX"), including noise, traffic and air quality impacts. The City appreciates that LAWA has, thus far, been receptive to discussion regarding the environmental analysis of the Project, including the proposed non-aviation, commercial development on surplus property ("Potential Future Development"). In order to fully address the City's concerns, however, the EIR must analyze the full scope of the Project's environmental effects, including the growth-inducing effects of removing existing ground access constraints as proposed. To that end, this letter explains the City's concerns about the Project and identifies specific impacts that LAWA should carefully evaluate as part of an informative and comprehensive EIR.

**Response:** The Draft EIR evaluates the proposed Project, as described and identified in Chapter 2, Description of the Proposed Project, and identified the full scope of the Project's potential environmental effects in Chapter 4, Environmental Impact Analysis, in compliance with CEQA.

**LAMP-AL00008-2**

**Comment:** By removing existing ground access constraints, the Project will ultimately enable Los Angeles International Airport to accommodate at least 95 million annual passengers ("MAP") instead of the 78.9 MAP historically represented as the maximum capacity for LAX. Despite the City's comments on the previously released Notice of Preparation ("NOP") and related National Environmental Policy Act Scoping Document ("NEPA Scoping Document"), both of which are attached to this letter, the DEIR fails to properly analyze the environmental effects of the Project. It must be revised to address the Project's substantial contribution to future growth in passenger traffic at LAX and the resulting impacts of such growth on surrounding communities.

**Response:** The commentor's claim that LAWA has historically identified 78.9 million annual passengers (MAP) as the "maximum capacity" of LAX is incorrect. It is true that prior LAWA documents, including the 2004 LAX Master Plan, identified 78.9 MAP as the "practical capacity" of LAX. "Practical capacity," however, is not equivalent to "maximum capacity" or "actual capacity." As summarized in Section 6.3.2 of the LAX Landside Access Modernization Program Draft EIR, practical capacity "takes into account market assumptions, expected physical characteristics of various airport system functional elements and how they are planned and expected to work together." More specifically, "practical capacity" means "a forecast of activity determined by how LAX's various components will function together in the context of real-world market conditions, particularly given the market conditions projected in LAX's forecast..."[1] The LAX Master Plan ("Alternative D") was designed to serve the same practical capacity as the then-existing airport would have served without the LAX Master Plan improvements (i.e., the same number of passengers that would have been served if no LAX Master Plan improvements had been made.) Both the existing airport design in 2004 and the approved LAX Master Plan design were projected to serve approximately 78.9 million passengers in 2015. The LAX Master Plan projections were based on an analysis of what elements at the airport (e.g., runways, airspace, terminals, or ground access) constrained the practical capacity of LAX. These projections were also predicated on an assumed aircraft fleet mix, load factor (number of passengers on each aircraft), and number of aircraft operations each airline passenger gate would accommodate on a daily

basis, among other factors. As a result of airline restructuring, consolidation, and increased efficiencies, the assumptions made in the 2004 LAX Master Plan did not account for the much larger average aircraft size (larger Boeing 737s, Airbus A-320, A-340, and A-350 aircraft), the high (in excess of 80 percent) passenger load factors, and the faster turnarounds at each passenger gate (i.e., more aircraft operations per gate on a daily basis) that is occurring today at LAX.

When the City approved the LAX Master Plan[2] in 2004, passenger levels at LAX were projected to reach 78.9 MAP sometime between 2005 and 2006. Between that time and 2012, significant increases in the cost of aviation fuel, the ongoing global economic downturn, increased security requirements, concerns about terrorism, and other market conditions caused significant reductions in demand for air services. As a result, at no time between 2004 and 2012 did LAX actually reach projected levels. In fact, passenger activity levels at LAX between 2007 and 2011 ranged from 56.5 MAP (in 2009) to 61.8 MAP (in 2011).

Thus, while passenger activity projections are based upon the best available evidence and expert opinion, history demonstrates, and LAWA has consistently acknowledged, that unexpected fluctuations in the economy, aviation industry practices, passenger demand, and other known and unknown factors may result in LAX annual passengers increasing or decreasing at a different rate than expected.

Similarly, LAWA acknowledges that the 2004 LAX Final Master Plan identified the curb and roadways component of the LAX system as the primary constraint on capacity under the No Action/No Project scenario, as discussed and depicted on Figure 1.2-1 of the LAX Final Master Plan.[3] However, the analyses relied upon the LAX Master Plan to make that determination were initiated in 1996 and were based on known conditions and assumptions made over 20 years ago.[4,5] Since 1996, LAWA has observed that passenger volumes and operations have fluctuated with periods of growth (e.g., the last six consecutive years of sustained growth) and decline (e.g., due to the events of September 11, 2001 and the 2008 recession). These fluctuations in passenger activity levels have occurred alongside heavy traffic congestion conditions at LAX with some areas of the Central Terminal Area (CTA) operating at LOS F since 1996. For example, as shown in Table 4.12.1-7 and discussed on page 4.12-20 of Section 4.12.1, On-Airport Transportation, of the LAX Landside Access Modernization Program Draft EIR, over half of the CTA roadways operated at LOS E or F at certain times of the day in 2014. Additionally, passenger activity levels at LAX in 2014 and 2015 have increased 6-percent year-over-year and 8 percent between 2015 and 2016, compared to an average of 4.1 percent over the four previous years (2010 to 2013), suggesting no direct statistical correlation between recent passenger activity levels and the existing congested conditions of the CTA.[6] These data strongly support a finding based on recorded passenger data that reducing airport roadway congestion would not remove an obstacle to passenger growth.

Despite congestion in the CTA, LAX today is seeing traffic in excess of the projected capacity of the curb and roadways component identified in the 2004 LAX Master Plan. Thus, the current evidence indicates that the capacity of the existing curb and roadways component of the LAX system is greater than previously thought and that LAX passenger activity levels can and will exceed 78.9 MAP despite the currently constrained and congested ground access conditions. Rather than ignore this reality, the LAX Landside Access Modernization Program Draft EIR acknowledges, as discussed on page 2-201 in Section 2.8.2 of the Draft EIR, LAX was expected to reach 78.9 MAP by the end of the year 2016 or in 2017. Based on LAWA's Traffic Comparison (TCOM) report dated January 25, 2017, LAX reached 80.9 MAP in calendar year 2016.[7]

By contrast, there is no evidence or analysis to support the commentor's statement that improving existing ground access will ultimately enable LAX to accommodate at least 95 MAP. As

discussed on page 6-7 in Section 6.3.2 of the Draft EIR, although congested traffic conditions in the CTA at LAX may cause passengers to arrive at the Airport earlier to account for traffic delays, the decision to choose to fly to, from, or through LAX is driven by many other factors. In its guidance for developing local aviation forecasts, the FAA discusses the following factors affecting aviation activity: socioeconomic data, demographics, disposable income, geographic attributes, and external factors such as fuel costs and airline industry-related factors (airline mergers, airline hubbing practices, and airfares).[8] Similarly, the Draft EIR acknowledges that airport accessibility is one of the factors contributing to passenger decisions, but it is not the main element. As further discussed in the Airport Cooperative Research Program (ACRP) Report 98, passengers will consider the following elements in evaluating travel options: air service availability, price, itineraries, flight schedules, airport convenience, airline quality, airport quality, and loyalty programs.[9] Airport accessibility is discussed in the Report as another contributing factor among other factors, such as length of time to travel to the airport, reliability of other modes of transportation, and access cost.[10] In other words, passengers choosing whether to fly and which airport to use are primarily motivated by airport destination options, flight frequency, fares and similar patterns. An additional 10-15 minutes of surface congestion will generally not cause passengers to change to another airport that may require even longer connecting flights, less convenient flight times, similar surface traffic, and more expensive fares. Instead, passengers build additional times into their surface transportation schedules.

Additionally, airline business decisions are the results of complex business models based upon sophisticated revenue, inventory, and pricing management systems. As discussed on pages 6-7 to 6-8 in Section 6.3.2 of the Draft EIR, according to LAWA's aviation experts, airline operations at LAX depend upon the following criteria:

- the ability to operate safely and efficiently on the airfield (with no or limited delays);
- the ability to have access to gates to accommodate their fleet at specific times throughout the day;
- the ability to tie operations at LAX to the remainder of their network; and
- the ability to efficiently process their passengers through ticketing and baggage claim processors.

There is no evidence airlines consider CTA or nearby surface traffic congestion as a factor in their business decisions regarding scheduling. Traffic conditions in the CTA or in the vicinity of LAX are not a direct input into flight scheduling models or airline decisions to add more seats or frequencies at LAX. As discussed in the ACRP Report 98, airline business models are based on "sophisticated revenue, inventory, and pricing management systems."[11] The Report also discusses the recent airline industry market conditions and how airlines have exhibited "great care when adding capacity on existing routes or starting service on new routes", especially in multiple-airport regions such as the Los Angeles area. Airlines have continued to add seats at LAX despite surface congestion and there is no indication that they will change this pattern. Therefore, reduced traffic congestion in the CTA would not be an important factor in airlines scheduling more flights or scheduling larger aircraft at LAX to accommodate any theoretical additional demand for air travel resulting from less traffic congestion in the CTA.

It is also important to note that relieving traffic in the CTA does not directly increase the Airport's capacity for additional passengers. The ground access component is only one component of the overall airport system, which includes other key components such as the runway and taxiway system and passenger processing components (e.g., ticket counters, security screening positions, holdrooms and gates).[12] The theoretical physical throughput capacity of any individual component of an airport system (e.g., terminal facilities and gates, runways and taxiways, ground

access and other components of the airport system) does not set the overall airport capacity.[13] Rather, practical capacity takes into account market assumptions, expected physical characteristics of various airport system functional elements and how they are planned and expected to work together.[14] Even if, hypothetically, reducing congestion in the CTA could allow more passengers to access the Airport, the practical capacity of the Airport and actual passenger growth would still be determined by how all of the individual components of the airport system function together. The 2016-2040 Regional Transportation Plan published by SCAG identifies the airfield as the limiting factor of capacity at LAX, based on the existing runway configuration. The proposed LAX Landside Access Modernization Program Project would not affect or change any airfield components, including the runways, taxiways, or aircraft arrival and departure procedures, and thus would not increase the overall capacity of LAX.

In light of these realities and the available evidence, LAWA determined, as explained in detail in Section 6.3.2 of the Draft EIR, that reduced traffic congestion in the CTA associated with the proposed Project would not directly or indirectly induce LAX passenger growth. Instead, the Draft EIR relies on projected future increases in passenger activity levels forecasted by the Federal Aviation Administration (FAA) and the Southern California Association of Governments (SCAG) which is consistent with CEQA Guidelines Section 15130(b)(1)(B). For example, as discussed on page 4-5 in Chapter 4, Environmental Impact Analysis, of the Draft EIR and documented in the *LAX 2024 and 2035 Passenger Flight Schedules Development Report*[15] prepared by LAWA's expert aviation consultants, the projected increase in passengers and operations at LAX assumed in the LAX Landside Access Modernization Program Draft EIR analyses was based on the results of the FAA 2014 Terminal Area Forecast (TAF),[16] which was prepared independently from the Draft EIR analyses. As discussed in the FAA 2014 TAF, the FAA's forecast is based on projected demand for air transportation considering local and economic conditions, "independent of the ability of the airport and air traffic control system to furnish the capacity required to meet the demand."[17] The FAA further acknowledges in the Report that existing constraints at the airport are "embedded in historical data" used by the FAA as a base for the forecast.[18] Accordingly, historical data on passenger activity levels reflect variations in passenger activity levels that may be attributed to traffic conditions in the CTA.

LAWA relied on the results of the FAA TAF forecast associated with the horizon years of 2024 and 2035 to determine whether the proposed Project could accommodate projected levels of activity and analyze potential impacts when compared to the without Project conditions.[19]

Based on the FAA 2014 TAF, passenger activity levels at LAX were assumed to reach 86 MAP in 2024 for Phase 1 of the LAX Landside Access Modernization Program and 95 MAP in 2035 for Phase 2 of the LAX Landside Access Modernization Program.[20] These projections assumed a 2.5 percent compounded annual growth rate (CAGR) between 2014 and 2024, and a 1.9 percent CAGR between 2024 and 2030. On average, over the TAF period of 2014-2040, passenger activity levels are forecasted to grow at a 2.1 percent CAGR.[21]

In summary, based on the above analysis, reduced traffic congestion in the CTA associated with the proposed Project would not directly or indirectly induce LAX passenger growth. The proposed Project would not directly or indirectly cause passenger growth, which could occur with or without the proposed Project. Based on FAA guidance and ACRP studies, reduced traffic congestion in the CTA and other enhancements in passenger convenience provided by the proposed Project are not primary consideration in passengers' decisions to travel to, from or through LAX, and how often they travel. Many other primary factors such as airfare prices and flight schedules more directly influence these decisions. In addition, based on ACRP studies, relieving traffic congestion in the CTA would not cause airlines to change their business decisions regarding adding more seats and flights at LAX, and would not directly increase the Airport's capacity for additional passengers.

The commentor's statement that the Draft EIR must be revised to address the Project's "substantial contribution to future growth in passenger traffic at LAX" is a summary statement. The Draft EIR assessed the potential environmental effects of the proposed Project, as defined in Chapter 2, Description of the Proposed Project, in compliance with the State CEQA Guidelines. As explained above, and as described in Chapter 4, Environmental Impact Analysis, of the Draft EIR, the proposed Project would not induce passenger growth; whether LAWA implements the LAX Landside Access Modernization Program or not, projected passenger growth will continue at LAX. The Draft EIR properly assesses what conditions would be like in 2024 and 2035 with increased passenger activity at LAX. See Response to Comment LAMP-AL00008-4.

[1] City of Los Angeles, Los Angeles World Airports, Preliminary LAX Specific Plan Amendment Study Report, July 2012, Section 6.2, p. 6-2.

[2] City of Los Angeles, Los Angeles World Airports, Preliminary LAX Specific Plan Amendment Study Report, July 2012, Section 6.2, p. 6-2.

[3] City of Los Angeles, Los Angeles World Airports, LAX Final Master Plan, April 2004, Section 1.2 on pages 1-4 and 1-7.

[4] See Section 3.3.1.1 of the 2000 LAX Draft Master Plan, page V-3.22 for information regarding the analysis of the LAX Master Plan No Action/No Project Alternative.

[5] Based on Table III-1.1 on page III-1.6 in Section 1.3 of the 2000 LAX Draft Master Plan, LAX accommodated 51 MAP in 1994 (year 1996 was not reported in Table III-1.1), and was forecasted to accommodate 74.2 MAP in 2005. In comparison, LAX actually accommodated 61.5 MAP in 2005 and 74.9 MAP in 2015. Therefore, LAX reached the passenger activity levels forecasted by the 2000 LAX Draft Master Plan 10 years later than expected, i.e., in 2015.

[6] LAX annual passenger activity levels: 2010: 59,070,127; 2011: 61,862,052; 2012: 63,688,121; 2013: 66,665,726; 2014: 70,663,519; 2015: 74,937,004; 2016: 80,921,527 – Source: City of Los Angeles, Los Angeles World Airports, "Statistics - Ten Year Summary – Passengers," Available: http://www.lawa.org/welcome_LAX.aspx?id=800, accessed August 17, 2016 and January 26, 2017.

[7] City of Los Angeles, Los Angeles World Airports, Traffic Comparison (TCOM) Calendar Year To Date 2016 January to December report dated January 25, 2017, Available: http://www.lawa.org/LAXStatistics.aspx, accessed January 26, 2017.

[8] U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5070-6B, Change 2, Airport Master Plans, January 27, 2015, Chapter 7 Aviation Forecasts, pp. 37-38, Available: http://www.faa.gov/documentLibrary/media/Advisory_Circular/150-5070-6B-Change-2-Consolidated.pdf, accessed August 25, 2016.

[9] Transportation Research Board of the National Academies, Airport Cooperative Research Program, ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions, 2013, p. 13, Available: http://onlinepubs.trb.org/onlinepubs/acrp/acrp_rpt_098.pdf, accessed August 25, 2016.

[10] Transportation Research Board of the National Academies, Airport Cooperative Research Program, ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions, 2013, pp. 13 and 14, Available: http://onlinepubs.trb.org/onlinepubs/acrp/acrp_rpt_098.pdf, accessed August 25, 2016.

[11] Transportation Research Board of the National Academies, Airport Cooperative Research Program, ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions, 2013, p. 5, Available: http://onlinepubs.trb.org/onlinepubs/acrp/acrp_rpt_098.pdf, accessed August 25, 2016.

[12] Note that according to the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS) published by the Southern California Association of Governments (SCAG) in April 2016, the airport system component limiting capacity at LAX is the airfield component. See Aviation & Airport Ground Access Appendix, p. 20.

[13] U.S. Department of Transportation, Federal Aviation Administration, Record of Decision, Proposed LAX Master Plan Improvements, Appendix B, Responses to Comments on the Final Environmental Impact Statement, May 20, 2005, p. B2-77, Available: http://www.faa.gov/airports/environmental/records_decision/lax/#lax05, accessed August 25, 2016.

[14] City of Los Angeles, Los Angeles World Airports, Preliminary LAX Specific Plan Amendment Study Report, July 2012, Section 6.2, p. 6-2, Available: http://www.lawa.org/LAXSPAS/Reports.aspx.

[15] Ricondo & Associates, Inc., LAX 2024 and 2035 Passenger Flight Schedules Development Report, August 2016, p. 1.

[16] Federal Aviation Administration, APO Terminal Area Forecast 2014, January 2015.

[17] Federal Aviation Administration, APO Terminal Area Forecast 2014, January 2015, p. 4.

[18] Federal Aviation Administration, Terminal Area Forecast Summary, Fiscal Years 2014-2040, p. 4, Available: https://www.faa.gov/data_research/aviation/taf/media/taf_summary_fy2014-2040.pdf, accessed August 25, 2016.

[19] The FAA TAF forecast is a reliable source of forecast data for the following reasons: 1) the FAA TAF is prepared and published by the FAA, a nationally and internationally recognized agency; 2) the FAA TAF results are updated every year based upon the previous year's activity results and trends at each airport; 3) the FAA TAF results are relied upon for all projects requiring FAA review and approval; and 4) the FAA TAF results include passenger and operation forecasts which are needed to develop flight schedules, as discussed in the LAX 2024 and 2035 Passenger Flight Schedules Development Report.

[20] For the purposes of the Draft EIR analyses, the 2030 passenger activity levels from the FAA 2014 TAF were held constant to 2035 to be consistent with the results of the Southern California Association of Governments' (SCAG's) Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life, Adopted April 7, 2016, Available: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

[21] Federal Aviation Administration, APO Terminal Area Forecast 2014, January 2015.

**LAMP-AL00008-3**

**Comment:** Please note that we will submit further comments on the LAMP DEIR's traffic analysis, and potentially other sections of the environmental document, once our traffic engineer completes his analysis.

**Response:** Comments from the City of El Segundo on the traffic analysis contained in the Draft EIR were received on December 2, 2016. See Comment Letter LAMP-AL00012 and Responses to Comments LAMP-AL00012-1 through LAMP-AL00012-19.

**LAMP-AL00008-4**

**Comment:** **I. The Project Would Remove Existing Ground Access Constraints and Allow LAX to Process a Higher Volume of Passengers Than Previous Planning Documents Considered.**

The Master Plan, Specific Plan Amendment Study ("SPAS"), and the 2006 Settlement establish and relied on a maximum operational capacity of 78.9 MAP.[1] In its Master Plan for LAX and all subsequent proposed improvements prior to LAMP, LAWA represented that limiting the total gates at LAX to 153 would result in a maximum practical capacity of 78.9 MAP. *See* SPAS Draft EIR (2012) at 2-4. LAWA's recent environmental review of airport development projects consistently assumes this capacity for the purpose of evaluating projects' environmental impact. *See, e.g.,* Draft EIR, Midfield Satellite Concourse ("MSC") (March 2014) at 4-16, fn. 10 (stating project would comply with LAX Master Plan gate cap limit); "MSC North FAQs," available at http://www.lawa.org/mscnorth/faq.aspx (last visited November 15, 2016) (stating MSC Program will comply with 2006 Stipulated Settlement at all times). Furthermore, the LAX Specific Plan, with which all future development at LAX must be consistent, required restudy and full California Environmental Quality Act ("CEQA") review if annual passenger activity levels were anticipated to exceed 78.9 MAP.

With LAMP, however, LAWA abandons its commitment to a constrained LAX. The same 153 gates once represented as limiting LAX passenger growth effectively to 78.9 MAP are now represented as able to accommodate at least 95 MAP. That growth apparently comes from efficiencies gained through larger aircraft, fewer empty seats and shorter times between plane arrivals and departures. Efficiency is, of course, generally a good thing. In this case, however, some negative consequences will follow. If LAX is not, in fact, constrained to 78.9 MAP as LAWA previously represented, then the communities around LAX, like El Segundo, will suffer impacts resulting from that growth unless LAWA conducts appropriate analysis and applies effective mitigation.

LAWA has stated that the LAMP Project EIR will serve as the required CEQA review under the existing LAX Specific Plan. However, although the Project is scaled to accommodate ground access traffic associated with passenger levels in excess of 78.9 million, the DEIR does not adequately evaluate other operational impacts (e.g., noise and air pollution from aircraft

operations and vehicular traffic) associated with passenger levels above 78.9 MAP. The DEIR may not ignore the impacts of the increased activity that the Project will facilitate, and its potential to further concentrate adverse impacts on nearby residents.

As the City has repeatedly emphasized to LAWA, the environmental analysis required by CEQA may not simply assert that alleviating the significant and longstanding ground access constraints at LAX will have no effect on airport operations; here, LAWA must provide substantial evidence to support such a conclusion. Pub. Res. Code §21080(e).

Instead, the DEIR simply ignores these impacts by claiming that, by the target date for Project completion, passenger levels will have grown to 95 MAP or higher *regardless* of whether the Project is actually built. *See, e.g.,* DEIR at 6-6 through 6-8. The DEIR fails to provide substantial evidence that this assumption, which underlies all of the DEIR's analysis of environmental impacts, is true. In the CEQA context, substantial evidence means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. . . . Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate . . . does not constitute substantial evidence." Cal. Code Regs., tit. 14 ("CEQA Guidelines"), § 15384(a).

The DEIR asserts that ground access has no bearing on airport capacity, thereby attempting to portray the role of ground access in passenger operations in black and white. This mischaracterizes what is in fact a very complex issue, particularly at LAX. As explained in the memorandum by Adib Kanafani, Ph.D., N.A.E., attached hereto as Exhibit G and incorporated by reference into this letter ("Kanafani Report"),[2] the DEIR fails to support the assertion that the Project will not enable any portion of the projected growth in passenger capacity. As the Kanafani Report describes, each component of the airport, including the passenger terminals, the airfield, and the ground access system, is a "link in a chain," and the link with the lowest capacity "determines the capacity of the whole system." Passengers, in particular domestic travelers who have a variety of other options in the LA region for airports that provide domestic flights, take ground access congestion (along with other factors) into account when they choose an airport, particularly when congestion gets very high.

Indeed, the data cited in the DEIR's discussion of this issue states that ground access plays a role in prospective passengers' decisionmaking, thereby contradicting the assertion that removing ground access constraints will not enable passenger growth. *See* DEIR at 6-7 (citing report of the Transportation Research Board of the National Academies, Airport Cooperative Research Program, which finds that that "[s]urface access issues . . . remain[] a primary passenger choice driver in the Los Angeles Basin. Given the presence of several regional facilities across the area, the traffic situation in the Basin drives the airport choice for a large proportion of travelers."). Other sources echo this finding; a 2013 report by the Eno Center for Transportation ("Eno Report") found that "[g]round access to the airport at LAX is the most significant chokehold in the airport's system and according to [LAWA] airport access infrastructure was projected to hit complete gridlock at 78.9 million annual passengers without improvements to the system." *See* Eno Report, attached hereto as Exhibit H, at 18. Similarly, the Southern California Association of Governments ("SCAG") 2040 Regional Transportation Plan / Sustainable Communities Strategy ("2040 RTP/SCS") states that "[p]assengers' choice of airports is based in part on the travel time to the airport and the convenience of access, so facilitating airport access is essential to the efficient functioning of the aviation system." 2040 RTP/SCS Aviation & Airport Ground Access Appendix, attached hereto as Exhibit I, at 22.[3]

LAWA itself has previously asserted that the ground access system is a significant constraint on passenger operations at LAX, and that it would need to be relieved to enable growth in passenger operations beyond approximately 78 MAP. The 2004 Master Plan, which considered an

unconstrained demand forecast of 98 MAP in 2015 and evaluated four alternative plans under this demand scenario, stated that the No Action/No Project Alternative (i.e., no Master Plan adopted) would limit passenger operations at LAX to 78 MAP because of the airport's "constrained curbs and roadways." 2004 Master Plan EIR at Figure 1.2-1. By contrast, the alternatives that included LAMP components would have permitted up to 98 MAP. *Id.*; *id.* at 1-4 ("The [No Project] Alternative is limited by the capacity of the curbfront in the Central Terminal Area (CTA) where passengers are dropped off and picked up in front of the existing terminals. The resulting annual passenger performance measure of this alternative is approximately 78 million.").

Although this evidence directly contradicts LAWA's assertion that the proposed removal of ground access constraints with LAMP will not contribute to the higher passenger forecast at LAX in the target completion year, the DEIR does not attempt to respond to any of it. LAWA's counterargument that ground access simply is not a constraint on airport capacity, and therefore improving ground access efficiency would not affect airport capacity or operations, is incorrect and not supported by substantial evidence in the record. As a result, the DEIR fails to justify its omission of analysis of environmental impacts related to higher passenger operations enabled by the Project, including increased aviation noise, traffic, air quality and greenhouse gas ("GHG") impacts.

[1] As set forth in the LAX Master Plan and associated EIR (*see* Exhibits A and B on the enclosed CD) and the Specific Plan Amendment Study ("SPAS") and associated EIR that LAWA prepared pursuant to settlement with its neighbors over the Master Plan (*see* Exhibits C and D); *see also* Exhibit E (LAX Specific Plan, requiring LAWA to initiate a new specific plan amendment study if annual passenger forecast is anticipated to exceed 78.9 MAP); Exhibit F (Midfield Satellite Concourse North Project EIR).

[2] In addition to providing responses to the comments of the City set forth in this letter, LAWA must provide responses to the comments contained in the Kanafani Report.

[3] On May 5, 2016, the City filed suit against SCAG, challenging its approval of the 2040 RTP/SCS and the adequacy of its associated environmental review. One of the critical defects in the EIR is its assumption that, although SCAG proposed to provide billions of dollars in funding to remove existing ground access constraints at LAX, this easier access would not enable higher passenger capacity. Due to that flawed reasoning, SCAG's EIR failed to analyze the impacts of this higher capacity, even as it projected a dramatic rise in the number of passengers traveling through LAX. The need for this analysis was particularly acute because none of LAWA's planning documents for LAX had analyzed, or developed mitigation for, operations scenarios with a capacity above 78.9 MAP. *See* SPAS Draft EIR at 2-4 (stating that LAWA will maintain consistency with the Master Plan's cap of 153 gates and projected 78.9 MAP).

**Response:** In the first paragraph, the commentor claims "LAWA represented that limiting the total gates at LAX to 153 would result in a maximum practical capacity of 78.9 MAP. See SPAS Draft EIR (2012) at 2-4". The commentor's citation is incorrect, as page 2-4 of the SPAS Draft EIR does not contain the words "maximum practical capacity". Page 2-4 of the SPAS Draft EIR discusses the following: "LAWA is seeking to maintain consistency with the LAX Master Plan design for a total of 153 gates, which was based on a future passenger activity level of 78.9 million annual passengers (MAP) at LAX in 2015." See Response to Comment LAMP-AL00008-2 for a discussion of the concept of practical capacity in the context of the 2004 LAX Master Plan. The

153-gate limit set forth by the Stipulated Settlement was meant to represent a number of gates commensurate to the assumed practical capacity of 78.9 MAP. It was not meant to represent a number of gates at which LAX maximum capacity would be reached, as suggested by the commentor.

In the first paragraph, the commentor proceeds with citing documents in which LAWA discusses its intent to comply with the 2006 Stipulated Settlement and the 153-gate limit (i.e., 2014 Midfield Satellite Concourse Draft EIR and the MSC North FAQs). LAWA's commitment to comply with the 2006 Stipulated Settlement is affirmed. As noted on pages 7-6 and 7-7 in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, LAWA is proposing changes to Section 7, LAX Specific Plan Compliance Review, of the LAX Specific Plan. Revisions to this section would include the removal of subsection G, Monitoring and Reporting, and subsection H, Additional Study Requirements. Portions of these requirements would be consolidated into proposed Appendix A. Requirements regarding the preparation of a Specific Plan Amendment Study would be removed from the LAX Specific Plan as the LAX Landside Access Modernization Program EIR fulfills that requirement as described in Section 2.8.2 of the Draft EIR.

In the second paragraph, the commentor asserts that LAWA has abandoned its commitment to a constrained LAX; see Response to Comment LAMP-AL00008-7 which addresses this assertion. The commentor also suggests that the proposed Project would allow 153 gates to accommodate "at least 95 MAP" based on "efficiencies gained through larger aircraft, fewer empty seats and shorter times between plane arrivals and departures." As explained in Response to Comment LAMP-AL00008-2, the proposed Project would not directly or indirectly induce LAX passenger growth; instead, the Draft EIR relies on projected future increases in passenger activity levels forecasted by the FAA and SCAG. Contrary to the commentor's statement, the proposed Project does not include any improvements that would accommodate "larger aircraft" or that would influence "fewer empty seats" (or load factors). Additionally, with larger aircraft and more passengers onboard, "shorter times between plane arrivals and departures" as suggested by the commentor would be impractical to achieve, as larger aircraft and higher passenger volumes take longer to service and process.[1] Regarding the last statement in the second paragraph of this comment, see Response to Comment LAMP-AL00008-7.

In the third paragraph, the commentor incorrectly asserts that "DEIR does not adequately evaluate other operational impacts (…) associated with passenger levels above 78.9 MAP". As discussed on page 6-6 in Section 6.3.2 of the Draft EIR, the Draft EIR analyses of future environmental conditions without the proposed LAX Landside Access Modernization Program Project relied upon the results of the report prepared in August 2016 entitled LAX 2024 and 2035 Passenger Flight Schedules Development Report, which studied two horizon years, 2024 and 2035, in which it was anticipated that LAX would reach 86 MAP and 95 MAP, respectively.[2] These levels of activity are also introduced in the discussion of the analytical framework presented on page 4-5 in Chapter 4 of the Draft EIR.

In the fourth paragraph, the commentor suggests the LAWA must provide substantial evidence to support the conclusion that alleviating significant and longstanding ground access constraints at LAX will have no effect on airport operations. As discussed in Response to Comment LAMP-AL00008-2, relieving traffic in the CTA does not directly increase the Airport's capacity for additional passengers. The proposed LAX Landside Access Modernization Program Project would not affect or change any airfield components, including the runways, taxiways, or aircraft arrival and departure procedures, all of which could, in some circumstances, entail changes in the number of operations that LAX can accommodate.

In the fifth paragraph, the commentor suggests that the Draft EIR fails to provide substantial evidence that passenger levels will have grown to 95 MAP or higher regardless of whether the Project is actually built. See Response to Comment LAMP-AL00008-2 for a discussion on factors that influence passenger growth. It is important to note that the forecasts of aviation activity utilized in the Draft EIR are not LAWA's forecasts. Rather, LAWA utilized forecasts of aviation activity projected by FAA and the regional forecasts projected by SCAG to determine an activity level that may occur at LAX in 2035. This was done to ensure that the EIR properly assessed the environmental effects of the LAX Landside Access Modernization Program at passenger activity levels that could occur at the Airport.

Comments included in the sixth and seventh paragraphs of this comment are a summary of discussions included in Exhibit G of the commentor's letter; see Responses to Comments LAMP-AL00008-82 through LAMP-AL00008-86, which address the specific comments in Exhibit G. Regarding statements included in the eighth paragraph of this comment, see Response to Comment -LAMP-AL00008-2 and Responses to Comments LAMP-AL00008-82 through LAMP-AL00008-86. The ninth paragraph of this comment is a summary of statements made in the above-discussed comments, and the responses above apply.

[1] Based on Boeing's Airplane Characteristics for Airport Planning manuals, a Boeing 737-900 requires 40 minutes between the time the passenger jet bridge or stairs is deployed to connect with the aircraft to the time the aircraft is ready to push back away from the gate (see Figure 5.2.8 on page 364 of the Boeing 737 Airplane Characteristics for Airport Planning manual). In contrast, a Boeing 747-400 would require 60 minutes to perform the same operation (see Figure 5.2.2 on page 119 of the Boeing 747 Airplane Characteristics for Airport Planning manual.) Manuals are available at: http://www.boeing.com/commercial/airports/plan_manuals.page

[2] Ricondo & Associates, Inc., LAX 2024 and 2035 Passenger Flight Schedules Development Report, August 2016, p. 2.

**LAMP-AL00008-5**

**Comment: II. LAWA Has Hidden Within LAMP a Number of Unnecessary Plan Changes, Which It Fails to Evaluate Properly in the DEIR**

The 2004 LAX Master Plan adopted for LAX makes clear that the option adopted (Alternative D) was designed to serve approximately 78 MAP, which was approximately the same aviation activity levels identified in the No Action/No Project Alternative. LAWA represented that constraining LAX in this way would encourage the development and use of regional airports. This same vision of a constrained LAX was carried forward in the SPAS. Other alternatives specifically considered and rejected as part of the 2004 Master Plan process would have involved higher MAP numbers and greater impacts.

In approving the LAX Master Plan (Alternative D), the LA City Council took care to ensure that growth beyond that anticipated in the Master Plan would not happen without subsequent public evaluation, discussion, and consideration at the City Council. This important "check" on LAX growth was implemented through adoption of the LAX Plan and LAX Specific Plan (*see* LAMP DEIR Appendices C & D). The LAX Plan establishes a land-use policy framework, while the LAX Specific Plan establishes zoning and development regulations consistent with the LAX Plan. Future development at LAX is required to be consistent with both plans, and this consistency must be established by LAWA in reports to the City Council. The LAX Specific Plan requires that

no "Project" at LAX may proceed unless it complies with the LAX Specific Plan and LAX Plan. As part of that compliance review, the Project is to be checked for compliance with Master Plan commitments and mitigation measures.

**Response:** Please see Responses to Comments LAMP-AL00008-2 and LAMP-AL00008-4 for a discussion on activity levels and capacity of LAX. It should be noted that the other alternatives considered in the LAX Master Plan included significant changes to the airfield, which are not part of the LAX Landside Access Modernization Program. The LAX Landside Access Modernization Program would not result in any change to aircraft operations, flight paths, or airfield components at LAX. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

**LAMP-AL00008-6**

**Comment:** Although the plan consistency requirement and review process has worked well since the 2004 LAX Master Plan was adopted, LAWA now proposes a number of major changes as part of the LAMP Project. Specifically, LAWA has proposed a number of significant changes to the LAX Specific Plan and LAX Plan that would remove key limits on LAX growth and gut the plan consistency review process that was specifically included by the City Council for the promotion of regionalism and protection of LAX neighbors. As discussed in detail below, LAWA proposes to delete the limit of 153 gates at LAX from the LAX Plan (*see* Appendix C at 1, 7), and also wants to delete references to designing and building out LAX to serve just 78.9 MAP of the regional passenger demand until at least 2035 (*see* Appendix C at 2). LAWA's proposed changes to the LAX Specific Plan would undermine its effectiveness as a mechanism for informed and transparent public review of aviation activity and growth at LAX.

**Response:** As stated in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, the proposed Project would require amendments to the LAX Plan to include descriptions of the proposed transportation facilities. In addition, the Belford Special Study Area would be updated to reflect the proposed use of this area under the Project, Airport Landside. Amendments would include changes to the text of the LAX Plan as well as updates to the associated figures. Text changes to the LAX Plan include updating the Vision for LAX; updating the goals and objectives to reflect the proposed Project; adding a description of a new Airport Landside Support Area; updating policies to reflect the proposed Project and other programs; and removing text regarding projects that are no longer relevant. Plan Areas would be updated to include: additional areas that are currently located in the Westchester-Playa del Rey Community Plan; areas in which the proposed facilities would be located; and to change the designation of the Belford Special Study Area to Airport Landside. In addition, LAX Plan maps and diagrams would be updated to reflect the proposed plan area changes.

The proposed Project would also require amendments to the LAX Specific Plan to update the text of the plan to reflect the proposed transportation components. Amendments would include: changes in the text of the LAX Specific Plan to facilitate implementation of the programs and policies in the plan; the addition of an Airport Landside Support Subarea; reorganization of text for consistency and clarity; removal of the parking regulations which are specific to the LAX Master Plan; clarification of which parcels within the LAX Specific Plan are subject to the trip generation provisions of the LAX Specific Plan; changes to the LAX Specific Plan compliance review; replacement of mitigation and reporting requirements for traffic generation and aviation activity related to the LAX Master Plan with reporting requirements that would be standard practice for all projects; removal of certain additional study requirements that would be fulfilled as part of the Landside Access Modernization Program Project; and the addition of LAX Design Guidelines, as

well as updates to the associated figures. The LAX Specific Plan would also be amended to allow the Executive Director to authorize the sale, dispensing, and consumption of alcohol beverages within sterile areas of the Airport or related off-site sterile areas without having to obtain a Conditional Use Permit from the Department of City Planning.

Section 7 of the LAX Specific Plan provides details on the LAX Specific Plan Compliance Review. Based on comments received, revisions to this section include changing the time for the Director of Planning to review and make a consistency determination from 15 working days to 75 days from the date the documents were received, unless the Director of Planning and the Executive Director agree more time is necessary.

Subsection (d) has been added under Subsection 2, Executive Director's Review. This section will state:

(d) Director of Planning Consistency Determination for Projects located in the LAX Northside Subarea North of Westchester Parkway and the LAX Landside Support Subarea. For proposed Projects located within the LAX Northside Subarea north of Westchester Parkway and the LAX Landside Support Subarea, the Executive Director shall transmit a copy of the written description of the proposed Project to the Director of Planning. The Director of Planning shall review the proposed Project for consistency with the following LAX Specific Plan Sections: Northside north of Westchester Parkway - Sections 12, 13.C.2, 14.D, and 15A; Landside Support Subarea – Sections 11, 13.C.3 and 14; and shall provide the Executive Director with a written determination within 75 days from the date the documents were received, unless the Director of Planning and the Executive Director agree more time is necessary. The Executive Director shall provide the BOAC with a copy of the Director of Planning's Consistency Determination.

Subsection 5, Effective Date of Decision, of the LAX Specific Plan Compliance Review will be revised to state:

5. Effective Date of Decision. *Unless a City Council Consistency Determination Review is required pursuant to Section 7.F.6 (Consistency Determination Review by City Council),* BOAC's decision shall become final ~~following five (5) Council business days consistent with Section 245 of the Los Angeles City Charter~~ *at the expiration of the next five meeting days of the City Council during which the Council has convened in regular session, unless, pursuant to Los Angeles City Charter, the action is brought before it or Council waives review of that action.*

Subsection 6, Consistency Determination Review by City Council, will be added to the LAX Specific Plan Compliance Review. This section will state:

*6. Consistency Determination Review by City Council.*

*(a) If the BOAC approves a proposed Project located within the LAX Northside Subarea north of Westchester Parkway or the LAX Landside Support Subarea with a Consistency Determination that is inconsistent with the Director of Planning Consistency Determination for that proposed Project, the Consistency Determination shall be reviewed by the City Council.*

*(b) Public Hearing and Notice. Before acting on the Consistency Determination, the City Council shall set the matter for hearing, giving a minimum of 15 days notice*

*to the applicant, the Councilmember of the district in which the Specific Plan Area is located, the Executive Director and the Director of Planning, and interested parties who have requested notice in writing for the Project.*

(c) *City Council Consistency Determination. The City Council shall make the same Consistency Determination required to be made by the Director of Planning pursuant to section 7.F.2.(d) above, supported by facts in the record, and indicate why the BOAC Consistency Determination is either approved or disapproved. The City Council shall act upon a Consistency Determination within 90 days after the matter is provided to the City Council for determination. The failure to act within the 90 days shall be deemed City Council concurrence with the BOAC Consistency Determination, and the original action on the matter shall become final. If the City Council determines that the BOAC approved Project is consistent with the applicable provisions of the LAX Specific Plan, the BOAC action shall become final. If the City Council determines the BOAC approved Project is not consistent with the applicable provisions of the LAX Specific Plan, the applicant shall be required to seek an Amendment, Exception, or a Project Permit Adjustment to the Specific Plan pursuant to LAMC Sections 11.5.6 and/or 11.5.7E, F and G, as appropriate.*

These changes will make the LAX Specific Plan consistent with other specific plans in the City of Los Angeles. These changes have been made in the text of Chapter 7 and Appendix D of the Draft EIR (See Chapter 3, Corrections and Additions to the Draft EIR).

The proposed changes to the LAX Plan and LAX Specific Plan do not call for additional gates above 153; they simply remove the reference to a specific number of gates. This change is proposed because the LAX Plan and LAX Specific Plan are not prescriptive plans that specify the exact number of facilities and passengers allowed at LAX; rather they are planning documents that discuss permitted land uses, zoning, and approval processes within the framework of the City of Los Angeles General Plan. Additional gates are not proposed as part of the LAX Landside Access Modernization Program. Any future development at LAX that would directly cause the number of gates to be increased would be subject to separate CEQA and NEPA review.

The proposed changes to the plans would not affect how the plans work or how LAWA coordinates with the surrounding communities. The City of Los Angeles General Plan consists of the General Plan Framework Element and other elements required by state law, including the Land Use Element and Transportation Element. In the City of Los Angeles, the General Plan Land Use Element consists of 35 local Community Plans, the LAX Plan, and the Port of Los Angeles Plan; the LAX Plan and Westchester-Playa del Rey Community Plan are two of the City's local Community Plans in the LAX area. The LAX Plan is the City's community plan for the LAX area; it is not a regional plan. As stated on page 7-2 in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, the ground access goal would be revised to focus on LAX, the only airport to which the LAX Plan is applicable, rather than referencing improvements at other regional airports. The proper planning document to discuss regionalization is the Southern California Association of Government's Regional Transportation Plan,[1] which does discuss regionalization issues associated with the Southern California commercial airports.

[1] Southern California Association of Governments, Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life, Adopted April 7, 2016, Available: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

**LAMP-AL00008-7**

**Comment:** **A. The Applicable Limits of 153 Gates and 78.9 MAP Contained in the LAX Plan Should Not Be Deleted as Part of LAMP.**

The DEIR does not adequately explain why the limits of 153 gates and 78.9 MAP are proposed for removal from the LAX Plan as part of LAMP. In fact, there is no logical link made between LAMP's proposed ground access upgrades and the removal of those limits from the Plan. The DEIR notes in several places that the LAMP project would necessitate amendments to the LAX Specific Plan and the LAX Plan, but the explanations of "necessity" provided are generally limited to relatively minor issues such as a boundary adjustment and a rezone, which are logically necessary for LAMP. The DEIR is silent regarding the substantial changes described below, which are not necessary or appropriate as part of LAMP.

It seems likely that LAWA has proposed the 78.9 MAP limit deletion in an attempt to avoid complying with that limit going forward and perhaps to dodge a plan inconsistency problem for the extremely ambitious LAMP. Specifically, because LAMP is designed to serve so much more than 78.9 MAP, it is not consistent with the 78.9 MAP limit in the LAX Plan. As discussed elsewhere in this letter, LAWA takes the untenable position that LAMP is not growth inducing, and insists it has no obligation to evaluate any of the impacts associated with passenger growth above 78.9 MAP as part of LAMP. LAWA cannot remove the 78.9 MAP limit from the LAX Plan without a full public discussion of that proposed policy change, which would include conducting a full analysis of the associated environmental impacts. In other words, if LAWA is now planning for LAX to serve more than 78.9 MAP, it must evaluate the impacts of that growth so the public and City Council decisionmakers have the information they need. The absence of this analysis is a major flaw in the LAMP DEIR. In the absence of that analysis, LAWA cannot remove the 78.9 MAP limit from the LAX Plan as part of the Project.

It seems likely that LAWA has proposed deletion of the 153 gates limit in an attempt to avoid having to comply with that limit going forward. LAWA should withdraw this proposed deletion because there is no LAMP-related reason articulated for the removal. Indeed, how could LAMP, which focuses on ground access improvements, logically necessitate an increase in the number of gates at LAX? In discussing this proposed change, LAWA correctly acknowledges that under its settlement agreement with El Segundo and others, a gate limit would continue to apply until at least 2020. DEIR at 7-2. What LAWA fails to acknowledge is that even after 2020, it cannot increase the number of gates at LAX without comprehensive environmental review and a Master Plan amendment. As such, the limit of 153 gates contained in the LAX Plan must remain in place unless and until that environmental review and public process is complete. Deleting the limit now is not necessary for LAMP, would be premature, and prejudges the outcome of a separate process not yet begun.

**Response:** Please see Response to Comment LAMP-AL00008-2 for a discussion of the reasons that the proposed Project would not directly or indirectly induce LAX passenger growth.

The proposed changes to the LAX Plan and LAX Specific Plan do not call for additional gates above 153; they simply remove the reference to a specific number of gates. This change is proposed because the LAX Plan and LAX Specific Plan are not prescriptive plans that specify the exact number of facilities and passengers allowed at LAX; rather they are planning documents that discuss permitted land uses, zoning, and approval processes within the framework of the City of Los Angeles General Plan. Additional gates are not proposed as part of the LAX Landside Access Modernization Program. Any future development at LAX would be required to comply with CEQA and NEPA.

Regarding the comment that "under its settlement agreement with El Segundo and others, a gate limit continue to apply until at least 2020", the Stipulated Settlement limits the number of passenger gates to 153 if the annual passengers at LAX is at or above 75 million. This provision applies through 2020, although the balance of the Stipulated Settlement expired on December 31, 2015.

Regarding the comment that a Master Plan amendment must be completed prior to any increase in the number of gates at LAX above 153, please see Response to Comment LAMP-AL00008-22 for an explanation of the FAA's requirements for Master Plan amendments.

**LAMP-AL00008-8**

**Comment:** If LAWA insists on pursuing removal of the current limits of 78.9 MAP and 153 gates from the LAX Plan as part of LAMP, it must first provide a complete analysis of the noise, air quality, and other environmental impacts that would result. That analysis would need to be provided in a recirculated DEIR. That document would consider, for example, the environmental impacts such as increased noise and increased emissions (air pollution and GHGs) associated with the increased aircraft operations at the added gates and serving annual passenger numbers in excess of 78.9 MAP. As discussed elsewhere in this letter, the LAMP DEIR provides no such analysis because it assumes (incorrectly) that the Project will not increase LAX's capacity or induce any growth in aviation activity.

**Response:** Please see Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, and LAMP-AL00008-7. As further explained in Response to Comment LAMP-AL00008-2, reduced traffic congestion in the CTA associated with the proposed Project would not directly or indirectly induce LAX passenger growth. The proposed Project would not directly or indirectly cause passenger growth, which could occur with or without the proposed Project. Based on FAA guidance and ACRP studies, reduced traffic congestion in the CTA and other enhancements in passenger convenience provided by the proposed Project are not primary consideration in passengers' decisions to travel to, from or through LAX, and how often they travel. Many other primary factors such as airfare prices and flight schedules more directly influence these decisions. In addition, based on ACRP studies, relieving traffic congestion in the CTA would not cause airlines to change their business decisions regarding adding more seats and flights at LAX, and would not directly increase the Airport's capacity for additional passengers.

**LAMP-AL00008-9**

**Comment:** We note that the DEIR includes Section 7 (Evaluation of Amendments to the LAX Plan and LAX Specific Plan). This section is very strange because it purports to analyze a Project element (Amendments to the LAX Plan and LAX Specific Plan) separate from the Project itself (LAMP). The reader is left with the impression that Section 7 was an afterthought added by LAWA once the bulk of the DEIR's environmental analysis was complete. This is inconsistent with CEQA's mandate to evaluate the whole of the project. It is also inconsistent with LAWA's obligation to inform the public and decisionmakers of all the Project's environmental impacts.

**Response:** Please see Response to Comment LAMP-AL00008-6. Section 2.8 in Chapter 2, Description of the Proposed Project, of the Draft EIR, clearly states that the proposed Project would require amendments to the LAX Specific Plan, the LAX Plan, the Westchester-Playa del Rey Community Plan, and the Mobility Plan 2035. The fact that the Draft EIR discusses some of the impacts of these proposed plan amendments in a separate chapter is inconsequential. CEQA does not require that EIRs be prepared using any particular format. State CEQA Guidelines Section 15120(a).

In addition, plan amendment impacts are also discussed throughout Chapter 4 of the EIR, as appropriate. Specifically, Section 4.8.5.1.1 of the Draft EIR analyzes the land use impacts associated with the proposed land use plan amendments, Section 4.8.5.1.2 of the Draft EIR analyzes land use plan consistency, and the remainder of Chapter 4 analyzes the impacts of the Project including land use changes that would occur as part of the Project. Section 7.3 of the Draft EIR contains an environmental analysis of the changes to the plans that were not specifically discussed in Chapter 4. Mitigation measures are proposed, as appropriate, for significant impacts associated with the proposed Project, including the Plan amendments. Thus, the EIR analyzes the whole of the project, including the proposed plan amendments, and it contains sufficient information and analysis to inform the public and the decisionmakers of the proposed Project's potential effects.

**LAMP-AL00008-10**

**Comment:** Moreover, the environment analysis in Section 7, which appears on just five pages, is limited to the following repeated conclusions: the proposed amendments to the LAX Plan and LAX Specific Plan "would generally correspond to changes at LAX as a result of the proposed Project [LAMP], as well as updates to administrative processes." In other words, LAWA argues that the proposed changes were either covered as part of the LAMP project assessment or are simple updates to administrative processes. This does not accurately capture the universe of proposed plan changes and their associated impacts.

**Response:** Please see Responses to Comments LAMP-AL00008-6 and LAMP-AL00008-9.

**LAMP-AL00008-11**

**Comment:** LAWA does acknowledge, in passing, that removal of the gate limitation "may result in future increased development" but argues that it need not evaluate the impact of that development now because "removal of these policies does not mean that additional development would occur. Any future development related to the change in these policies would undergo separate CEQA review and would be subject to BOAC and other approvals prior to implementation." This is the very definition of improper deferral of environmental analysis in violation of CEQA. If future exceedance of the 153 gate limit is uncertain and speculative as LAWA seems to claim, then LAWA should not ask the City Council to delete the limit from the LAX Plan now. If, on the other hand, LAWA insists asking the City Council to delete the 153 gate limit now, it must also provide more detail regarding its gate increase plans and evaluate the associated impacts.[4] It cannot delete the gate limit now based on the representation that the associated impacts would be evaluated later.

[4] We note, for example, that LAWA's recent NOP for the LAX Terminals 2 and 3 Modernization Project ("T2 & 3 Project") indicates that LAWA may add up to five gates as part of that project. This increase is not speculative and must be evaluated as part of the T2 & 3 Project as well as LAMP, if removal of the 153 gate cap remains as part of LAMP. We hereby request that LAWA include all public project and CEQA documentation for the T2 & 3 Project in its record for LAMP. The NOP and Initial Study are provided as Exhibit J hereto. We also understand that LAWA has plans for additional gates in what it terms the "Passenger Terminal Modernization Area" ("PTMA"). *See* LAWA-ARSAC Memorandum of Understanding, attached hereto as Exhibit K.

**Response:** As noted in Response to Comment LAMP-AL00008-2, LAX accommodated 80.9 MAP in 2016. The official gate count for LAX in 2016 was 141 passenger gates, well below the 153-gate limit contained in the Stipulated Settlement or assumed would be needed to accommodate 78.9 MAP

by the LAX Master Plan Alternative D. The LAX Landside Access Modernization Program Draft EIR does include the cumulative effect of potential additional gates at LAX, as noted in Table 3-1 in Chapter 3, Overview of Project Setting, of the Draft EIR. However, even with construction of these gates, LAWA would remain at or below the 153-gate limit. Please also see Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-7, and LAMP-AL00008-8.

**LAMP-AL00008-12**

**Comment:** **B. The LAX Specific Plan Changes Proposed by LAWA Would Remove Key Protections Put in Place by the LA City Council When It Approved the 2004 LAX Master Plan.**

LAWA proposes a multitude of changes to the LAX Specific Plan as part of the LAMP. Examples include:

- Expanding significantly the universe of projects exempt from plan consistency review (*see* Appendix D at 7-9).

**Response:** Pages 7 to 9 of Appendix D, LAX Specific Plan Revisions, of the Draft EIR, refers to the definition of "Project" in the LAX Specific Plan. The additions are for minor projects, specifically, additions to existing structures of less than 2,500 square feet; repair installation, extension, and replacement of utilities; restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment and systems to meet current standards of public health, safety, and environmental protection; repair or in-kind replacement in existing location of existing streets, sidewalks, gutters, bicycle and pedestrian trails, parking lots (excluding parking structures), aircraft parking areas, and taxiway; new construction, relocation or installation of small facilities, structures, buildings less than 15,000 square feet; installation, relocation, and replacement of lighting, security equipment, noise and environmental monitoring systems or storage tanks; and basic data collection, research, experimental management, and resource evaluation activities such as geologic testing. These additions reflect routine, small construction projects at LAX. It does not exempt them from environmental review or FAA review, just the formal Plan Compliance review.

**LAMP-AL00008-13**

**Comment:** • Substituting the Board of Airport Commissioners ("BOAC") for the LA City Council as the body responsible for confirming the plan consistency of projects proposed for LAX (*see* Appendix D at 10, 13).

**Response:** The Plan Compliance Review process has been made consistent with other Specific Plans in the City of Los Angeles. BOAC would make a finding of plan consistency after receiving a written report and recommendation from LAWA's Executive Director. As noted in Response to Comment LAMP-AL00008-6, a Subsection (d) has been added under Subsection 2, Executive Director's Review. This section will state:

(d) Director of Planning Consistency Determination for Projects located in the LAX Northside Subarea North of Westchester Parkway and the LAX Landside Support Subarea. For proposed Projects located within the LAX Northside Subarea north of Westchester Parkway and the LAX Landside Support Subarea, the Executive Director shall transmit a copy of the written description of the proposed Project to the Director of Planning. The Director of Planning shall review the proposed Project for consistency with the following LAX Specific Plan Sections: Northside north of Westchester Parkway - Sections 12, 13.C.2, 14.D, and 15A; Landside Support Subarea – Sections 11, 13.C.3 and 14; and shall provide the Executive Director with a written determination within 75 days from the

date the documents were received, unless the Director of Planning and the Executive Director agree more time is necessary. The Executive Director shall provide the BOAC with a copy of the Director of Planning's Consistency Determination.

Subsection 5, Effective Date of Decision, of the LAX Specific Plan Compliance Review will be revised to state:

5. Effective Date of Decision. *Unless a City Council Consistency Determination Review is required pursuant to Section 7.F.6 (Consistency Determination Review by City Council),* BOAC's decision shall become final ~~following five (5) Council business days consistent with Section 245 of the Los Angeles City Charter~~ *at the expiration of the next five meeting days of the City Council during which the Council has convened in regular session, unless, pursuant to Los Angeles City Charter, the action is brought before it or Council waives review of that action.*

Subsection 6, Consistency Determination Review by City Council, will be added to the LAX Specific Plan Compliance Review. This section will state:

*6. Consistency Determination Review by City Council.*

(a) *If the BOAC approves a proposed Project located within the LAX Northside Subarea north of Westchester Parkway or the LAX Landside Support Subarea with a Consistency Determination that is inconsistent with the Director of Planning Consistency Determination for that proposed Project, the Consistency Determination shall be reviewed by the City Council.*

(b) *Public Hearing and Notice. Before acting on the Consistency Determination, the City Council shall set the matter for hearing, giving a minimum of 15 days notice to the applicant, the Councilmember of the district in which the Specific Plan Area is located, the Executive Director and the Director of Planning, and interested parties who have requested notice in writing for the Project.*

(c) *City Council Consistency Determination. The City Council shall make the same Consistency Determination required to be made by the Director of Planning pursuant to section 7.F.2.(d) above, supported by facts in the record, and indicate why the BOAC Consistency Determination is either approved or disapproved. The City Council shall act upon a Consistency Determination within 90 days after the matter is provided to the City Council for determination. The failure to act within the 90 days shall be deemed City Council concurrence with the BOAC Consistency Determination, and the original action on the matter shall become final. If the City Council determines that the BOAC approved Project is consistent with the applicable provisions of the LAX Specific Plan, the BOAC action shall become final. If the City Council determines the BOAC approved Project is not consistent with the applicable provisions of the LAX Specific Plan, the applicant shall be required to seek an Amendment, Exception, or a Project Permit Adjustment to the Specific Plan pursuant to LAMC Sections 11.5.6 and/or 11.5.7E, F and G, as appropriate.*

These changes will make the LAX Specific Plan consistent with other specific plans in the City of Los Angeles and will allow any plan consistency determination to be appealed to the City Council. These changes have been made in the text of the Draft EIR (See Chapter 3, Corrections and Additions to the Draft EIR).

**LAMP-AL00008-14**

**Comment:** • Deleting references to compliance with Master Plan mitigation measures and commitments (*see* Appendix D at 10, 12).

**Response:** The references to compliance with applicable Master Plan commitments and mitigation measures is being stricken because many of the projects being undertaken by LAWA are no longer Master Plan projects; thus, they have their own Mitigation Monitoring and Reporting Programs (e.g., the Midfield Satellite Concourse, the Runway 7L-25R Runway Safety Area Improvements Project, the Runway 6L-24R Runway Safety Area Improvements Project, the LAX Landside Access Modernization Program). The requirement to comply with CEQA includes the requirement to comply with the applicable mitigation measures and commitments contained in each applicable certified CEQA document, and LAWA will continue to comply with applicable Master Plan mitigation measures and commitments as required by law.

**LAMP-AL00008-15**

**Comment:** • Limiting compliance review to the LAX Specific Plan (eliminating the need for LAX Plan compliance review).

**Response:** References to compliance review have been clarified to LAX Specific Plan Compliance review in the LAX Specific Plan document, which outlines the compliance review process. Consistency with the LAX Plan and applicable portions of the Los Angeles General Plan Framework are performed as part of the CEQA review for each project.

**LAMP-AL00008-16**

**Comment:** • Deleting the LAX Master Plan Stakeholder Liaison, who was tasked with assisting with communication between LAWA and stakeholders such as its neighbor, El Segundo (*see* Appendix D, throughout). Under LAWA's proposed change, apparently only Councilmember District 11 would have the benefit of a stakeholder liaison, not El Segundo and other neighbors outside the City of LA.

**Response:** LAWA currently funds a community liaison for Councilmember District 11. The LAX Master Plan Stakeholder Liaison still exists, but is a staff position within LAWA responsible for coordinating with all stakeholders. References to the LAX Master Plan Stakeholder Liaison are proposed for deletion, as the LAWA stakeholder liaison does more than coordinate LAX Master Plan projects. The language in the LAX Specific Plan is proposed to be revised to eliminate specific references to the Master Plan Stakeholder Liaison.

**LAMP-AL00008-17**

**Comment:** LAWA does not provide an adequate, comprehensive description of these proposed plan changes, referring to them generally as "updates to administrative process." *See, e.g.,* DEIR at 7-1 *et seq.* As a result, it will be difficult if not impossible for the public and decisionmakers to gain a comprehensive understanding of the nature and extent of, much less the reasoning for, LAWA's plan change proposals. To the contrary, readers of the DEIR are told in general terms that the Project "necessitates" the proposed plan changes, when (in fact) the most significant changes appear to be proposed by LAWA for reasons unrelated to LAMP. LAWA must instead provide a clear narrative description of all proposed change and the reason for each. Once that description is provided, it should become clear that LAWA is seeking (for reasons unrelated to LAMP) to eliminate important checks put in place by the City Council. Those checks remain necessary and appropriate today.

**Response:** Please see Responses to Comments LAMP-AL00008-6 through LAMP-AL00008-16. Section 2.8, Entitlements, in Chapter 2, Description of the Proposed Project, of the Draft EIR, describes the proposed changes to the LAX Plan and the LAX Specific Plan. Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, identifies the changes to each section of the LAX Plan (Section 7.1, LAX Plan Proposed Amendments) and LAX Specific Plan (Section 7.2, LAX Specific Plan Proposed Amendments). Appendix C, LAX Plan Revisions, of the Draft EIR, provides a markup copy of the LAX Plan specifying all of the proposed revisions to the LAX Plan. Similarly, Appendix D, LAX Specific Plan Revisions, of the Draft EIR, (as revised in Chapter 3, Corrections and Additions to the Draft EIR) provides a markup copy of the LAX Specific Plan specifying all of the proposed revisions to the LAX Specific Plan. This information provides the public and decisionmakers with adequate information and analysis of the proposed plan amendments.

**LAMP-AL00008-18**

**Comment:** **III. A Specific Plan Amendment Study Is Now Required—the Requirement Is Not Satisfied by LAMP, and Must Remain in the LAX Specific Plan Until Satisfied.**

The LAX Specific Plan plainly requires a Specific Plan Amendment Study and full CEQA review if annual passenger activity levels are anticipated to exceed 78.9 MAP. The LAMP DEIR makes clear that LAWA now anticipates annual passengers will meet or exceed 78.9 million in 2016 or 2017. DEIR at 2-201. Under the Specific Plan, LAWA must therefore conduct a Specific Plan Amendment Study. This study would augment/update the analysis performed by LAWA for the LAX Master Plan and SPAS to include the higher passenger levels LAWA now desires and anticipates for LAX. This Specific Plan Amendment Study is critical because all current plans for LAX assumed and were based on a maximum passenger level of 78.9 MAP. In fact, the 2004 Master Plan (Alternative D) was approved by the LA City Council only after it received assurances that LAX would not be modified to serve passenger numbers exceeding 78.9 MAP absent further analysis (through a Specific Plan Amendment). That is not what LAWA is doing with LAMP.

LAWA does not conduct the required analysis as part of the LAMP DEIR or propose to do it elsewhere. In fact, LAWA proposes to forever delete the operative language of the LAX Specific Plan and LAX Plan (DEIR Appendices C & D), rather than preparing the required Specific Plan Amendment and CEQA review. DEIR 2-195 to 201. LAWA seems to argue that its traffic analysis done in connection with LAMP should excuse it from conducting the Specific Plan Amendment Study clearly required by the LAX Specific Plan when aviation activity analysis shows annual passengers are anticipated to exceed 78.9 million. DEIR at 7-7. The LAMP analysis is, however, not equivalent to, and no substitute for, the required Specific Plan Amendment Study.

Most notably, as discussed elsewhere in this letter, the LAMP analysis treats as a given that LAX passenger activity will continue to grow past 78.9 MAP. The LAMP documents do not evaluate, much less offer mitigation for, impacts associated with that growth (e.g., increased noise and air quality impacts on surrounding communities associated with increased aircraft activity). As such, LAMP does not comply with a key requirement set forth in the LAX Specific Plan. LAWA's proposed remedy (deletion of the requirement) is inconsistent with clear City Council direction and the City of Los Angeles' General Plan framework.

LAWA's current attempt, as part of LAMP, to evade and delete the Specific Plan Amendment requirement, is wholly inconsistent with its prior statements and commitments on the subject. As recently as its Specific Plan Amendment adoption in 2013, LAWA described the LAX Specific Plan section 7.H as "requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 78.9 MAP."

*See* SPAS Report Appendix F (Operational Analysis) at 11 (section 2.5). In other words, LAWA has previously recognized that if and when the forecast for annual aviation activity levels reached 78.9 MAP, it would be obligated to undertake and request Council approval for a Specific Plan Amendment. Now that anticipated levels have reached that point, LAWA seeks to avoid the requirement by deleting it.

**Response:** As the commentor noted, LAWA completed a Specific Plan Amendment Study in 2013. As noted on pages 7-6 and 7-7 in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, LAWA is proposing changes to Section 7, LAX Specific Plan Compliance Review, of the LAX Specific Plan. Revisions to this section would include the removal of subsection G, Monitoring and Reporting, and subsection H, Additional Study Requirements. Portions of these requirements would be consolidated into proposed Appendix A. Requirements regarding the preparation of a Specific Plan Amendment Study would be removed from the LAX Specific Plan as the LAX Landside Access Modernization Program EIR fulfills that requirement as described in Section 2.8.2 of the Draft EIR.

Neither the LAX Plan nor the LAX Specific Plan restrict LAX to 78.9 MAP. The purposes of the LAX Specific Plan, as identified in Section 2, Purposes, of the LAX Specific Plan are to:

A. Recognize the uniqueness of LAX as a regional economic engine, an international gateway to the Pacific Rim, and an important public amenity;

B. Provide regulatory controls and incentives for the systematic and incremental execution of the LAX Plan, an element of the General Plan, to provide for public needs, convenience and general welfare as the development of the airport necessitates;

C. Ensure the orderly development of infrastructure consistent with the intensity and design of the LAX Plan by establishing general procedures for development within the Specific Plan Area;

D. Promote the development of a regional airport system in Southern California through an improved regional ground access system;

E. Provide the appropriate zoning regulations for the development of the LAX Plan in conformance with the goals and objectives of other local and regional plans and policies;

F. Ensure the Los Angeles World Airport's ability to operate LAX safely and efficiently throughout implementation of the LAX Plan;

G. Recognize the important relationship between LAX and its neighbors and avoid development impacts to the extent practical and feasible;

H. Protect airport-related and community businesses by providing regulatory controls and incentives consistent with these goals; and

I. Ensure on-going participation in improvements to LAX by appropriate stakeholders - business, labor, community, airline industry trade groups, and government – through consultation with stakeholders.

The LAX Landside Access Modernization Program Draft EIR evaluates the changes to the ground access system proposed by LAWA in relation to the surrounding neighborhoods and jurisdictions and seeks to implement the LAX Landside Access Modernization Program in an orderly manner with minimal impact to its neighbors. The Draft EIR evaluates the proposed

changes to the LAX Plan and LAX Specific Plan, the effect of the LAX Landside Access Modernization Program on the policies and procedures contained in the LAX Plan and LAX Specific Plan, and recommends changes to maintain the intent and effectiveness of the plans given current and proposed conditions. As such, the LAX Landside Access Modernization Program Draft EIR also fulfills the requirement to conduct a Specific Plan Amendment Study. Please also see Response to Comment LAMP-AL00008-9.

**LAMP-AL00008-19**

**Comment:** Similarly, LAWA recognizes that Section 7.H.2 of the LAX Specific Plan requires it to initiate an LAX Domestic Passenger Survey/Study and corresponding Airline Survey/Study if the annual aviation activity forecast indicates that the annual passengers in the year when LAX is anticipated to exceed 78.9 million. LAWA represents that it will meet this requirement by conducting the required surveys in 2016 and 2017. It also proposes to delete the requirement. Deleting the requirement is, however, premature and should not be approved by the Council until LAWA has satisfactorily completed the required surveys and made them public.

**Response:** As noted on pages 7-6 and 7-7 in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, LAWA is proposing changes to Section 7, LAX Specific Plan Compliance Review, of the LAX Specific Plan. Revisions to this section would include the removal of subsection G, Monitoring and Reporting, and subsection H, Additional Study Requirements. Portions of these requirements would be consolidated into proposed Appendix A. As indicated on page 7-7 of the Draft EIR, text regarding a domestic passenger and airline market survey/study would be removed, as LAWA would undertake this study as part of the proposed Project. LAWA is working on amending its contract with a survey firm to fulfill the LAX Specific Plan survey requirements in 2017.

**LAMP-AL00008-20**

**Comment:** **IV. LAWA Improperly Distances the LAMP and its DEIR from the Governing LAX Master Plan.**

The DEIR states,

Although components of the LAX Landside Access Modernization Program were contained in the LAX Master Plan and the LAX Specific Plan Amendment Study, the proposed Project for ground access improvements at LAX has substantively evolved from the programmatic plans contained in these previous program level documents, and the proposed LAX Landside Access Modernization Program is substantively different from the ground access improvements evaluated in the 2004 LAX Master Plan and the associated Final Environmental Impact Statement/Final Environmental Impact Report. Thus, because the current plan evaluated in this Environmental Impact Report (EIR) substantively differs from programmatic concepts in the LAX Master Plan and SPAS, this EIR does not tier off of the environmental documents associated with those plans; it is a standalone analysis of LAWA's current project-level plans for ground access improvements at LAX. Because the LAX Landside Access Modernization Program does not tier off of the LAX Master Plan EIR and is a substantively different project, this Project is not considered an LAX Master Plan project and is not subject to the LAX Master Plan commitments and mitigation measures; thus, LAWA has identified mitigation measures specific to this Project as appropriate. The LAX Master Plan commitments and mitigation measures are still in effect for all Master Plan projects, just as other project-specific mitigation measures are in effect for other non-LAX Master Plan projects.

DEIR at 1-4, 1-5; *see also id.* at 2-4.

A review of the LAX Master Plan adopted in 2004 and subsequent LAX Specific Plan Amendment Study makes clear that the following elements were at the core of the LAX Master Plan: an automated people mover, a remote rental car facility, an intermodal transportation facility, and remote parking garages/drop-off areas. Even LAWA seems to recognize that those same elements constitute the LAMP. Given that the LAX Master Plan (and SPAS) remain the governing planning documents for the airport and the elements of LAMP are so clearly envisioned by the Master Plan, LAWA simply is not at liberty to distance LAMP from the LAX Master Plan as it attempts to do. LAWA must instead follow (or seek to amend) the LAX Master Plan and Specific Plan.

For the reasons noted below, we are particularly concerned by the following LAMP DEIR statements:

- "the current plan evaluated in this Environmental Impact Report (EIR) substantively differs from programmatic concepts in the LAX Master Plan and SPAS"
- "this Project is not considered an LAX Master Plan project and is not subject to the LAX Master Plan commitments and mitigation measures"

LAWA must present a clear side-by-side comparison of LAMP and the programmatic concepts in the LAX Master Plan and SPAS to detail similarities and differences. If the differences are indeed substantial, then a LAX Master Plan revision and/or Specific Plan amendment would be necessary and appropriate before proceeding with LAMP. LAWA may not pursue a major initiative such as LAMP wholly separate from the LAX Master Plan (as amended by SPAS), which remain the governing planning documents for the airport. The Master Plan is *the* "modernization plan" that accounts for all growth at LAX, including construction of new taxiways, increasing runway length, improving the level of passenger service throughout the CTA, building new aircraft parking gates, and installing an automatic people mover, consolidated rental car facility, and a more efficient connection between LA Metro and LAX. *See generally* Master Plan Executive Summary.

**Response:** The commentor is incorrect that the LAX Master Plan is the governing planning document for LAX. The LAX Master Plan, completed in 2004, was a plan that accounted for the growth at LAX since 1984,[1] and was based on 1995 conditions projected over a 20-year period through 2015. The LAX Master Plan preferred alternative was Alternative D, the Enhanced Safety and Security Plan, which was developed in response to the September 11, 2001 terrorist attacks. This plan called for the elimination of private vehicle access in the CTA. The 2013 Specific Plan Amendment Study studied the ground access concepts (including an Automated People Mover (APM), consolidated rental car facility (CONRAC), and Intermodal Transportation Facility (ITF)) in greater detail, which, as stated on page 2-4, Chapter 2, Description of the Proposed Project, of the Draft EIR, formed the conceptual framework of the proposed LAX Landside Access Modernization Program.

Page 2-3 of the Draft EIR also states:

> In its 2005 Record of Decision (ROD),[2] the Federal Aviation Administration (FAA) approved the ground transportation improvements as described in the approved LAX Master Plan and as depicted on the LAX Airport Layout Plan (ALP) adopted in connection with the ROD. LAWA has since refined these projects as the LAX Landside Access Modernization Program, in part to be consistent with updated regional transit plans for the Region and to address stakeholder feedback. As part of the required environmental review process for the LAX Landside Access Modernization Program, the FAA has initiated environmental review in compliance with the National Environmental Policy Act (NEPA) and other federal requirements. Because the proposed LAX Landside Access

Modernization Program is not the same project evaluated in the 2004 LAX Master Plan or the associated Final Environmental Impact Statement/Final Environmental Impact Report, the Project is being analyzed as a stand-alone project under a separate environmental review.

The Federal Aviation Administration (FAA) has informed LAWA that the LAX Master Plan and LAX Master Plan EIS cannot be relied upon for the LAX Landside Access Program as too much time has passed since the ROD and because the proposed LAX Landside Access Modernization Program is substantively different from the LAX Master Plan. FAA does not require a master plan or master plan amendment to evaluate airport projects; it requires an amended Airport Layout Plan depicting the proposed projects, which LAWA submitted to FAA in 2016. Both the Master Plan and Specific Plan Amendment Study were programmatic documents. In the CEQA environmental documents prepared on both plans, LAWA clearly stated that the projects identified in the plans would be subject to project-level review once more detail was known about the projects. The LAX Landside Access Modernization Program is clearly derived from those conceptual plans, as they discuss implementation of an APM, CONRAC, and ground transportation centers. The Draft EIR assesses the environmental effects of the proposed improvements at a project-level of detail; improvements have been refined to reflect more detailed planning and analysis. There is no requirement or reason to revise the LAX Master Plan or Specific Plan Amendment Study to reflect these refinements. Rather, the Airport Layout Plan would be revised to reflect the proposed facilities, and the ALP is what FAA would evaluate and approve for the proposed Project and subsequently utilize to evaluate any future projects at LAX.

As noted in Response to Comment LAMP-AL00008-18, the LAX Landside Access Modernization Program Draft EIR evaluates the changes to the ground access system proposed by LAWA in relation to the surrounding neighborhoods and jurisdictions and seeks to implement the LAX Landside Access Modernization Program in an orderly manner with minimal impact to its neighbors. The Draft EIR evaluates the proposed changes to the LAX Plan and LAX Specific Plan, the effect of the LAX Landside Access Modernization Program on the policies and procedures contained in the LAX Plan and LAX Specific Plan, and recommends changes to maintain the intent and effectiveness of the plans given current and proposed conditions. As discussed in Response to Comment LAMP-AL0008-18, the LAX Landside Access Modernization Program Draft EIR also fulfills the requirement to conduct a Specific Plan Amendment Study.

[1] City of Los Angeles, Los Angeles World Airports, LAX Final Master Plan, April 2004, Executive Summary on page i-1.

[2] U.S. Department of Transportation, Federal Aviation Administration, Record of Decision, Proposed LAX Master Plan Improvements, May 20, 2005, Available: http://www.faa.gov/airports/environmental/records_decision/lax/#lax05, accessed August 25, 2016.

**LAMP-AL00008-21**

**Comment:** If, by contrast, LAWA were to change course and attempt to make LAMP consistent with the LAX Master Plan, then all of the LAX Master Plan commitments and mitigation measures would apply. Those commitments include developing LAX to serve a practical capacity of 78.9 MAP, with no more than 153 gates. Mitigation measures are detailed in LAWA's adopted Mitigation Monitoring and Reporting Program ("MMRP") and include commitments to implement and expand the LAX Aircraft Noise Mitigation Program ("ANMP") to provide noise relief to surrounding communities such as El Segundo.

**Response:** See Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-5, LAMP-AL00008-7, LAMP-AL00008-8, and LAMP-AL00008-18. As noted on page 2-4 of Chapter 2, Description of the Proposed Project, of the Draft EIR, the LAX Master Plan commitments and mitigation measures are still in effect for all LAX Master Plan projects, just as other Project-specific mitigation measures are in effect for other non-LAX Master Plan projects. The proposed Project would not affect or alter the ANMP; LAWA has committed to the ANMP and recently completed a Part 150 Noise Exposure Map (NEM) Update[1] required by FAA in order for LAWA to continue aircraft noise mitigation efforts around LAX.

[1] ESA Airports, Los Angeles International Airport, Title 14, Code of Federal Regulations (CFR) Part 150 Noise Exposure Map Report Update, August 2015, Available: http://lawa.org/pdf/Final%20LAX%20NEM%20Entire%20Report.pdf.

**LAMP-AL00008-22**

**Comment:** **V. Under FAA Guidance, the Project Requires an Update to the Master Plan, Not Simply a Revision of the Airport Layout Plan.**

Because the Project will receive federal funding, LAWA must update the Master Plan to be consistent with the Project and the associated passenger forecast generated by LAWA. The DEIR states that LAWA will, as a connected action, seek "FAA unconditional approval of the Airport Layout Plan (ALP) for the Airport depicting the proposed improvements," apparently instead of the required update to the master plan. DEIR at 2-217. Under FAA advisory circular 150/5070-6B ("AC"), however, the scope and sheer number of individual components of the LAMP, and its significant deviations from the current master plan, require a master plan update, not just an update to the ALP. FAA advisory circular 150/5070-6B, attached hereto as Exhibit L, at 7 (ALP update an appropriate alternative to master plan update only when "fundamental assumptions" of previous master plan will not change, or when proposal involved a "single development item").[5] LAWA cannot avoid the FAA requirement to update the LAX Master Plan simply by saying the Project "is not considered a Master Plan project and is not subject to the Master Plan commitments and mitigation measures." DEIR at 2-4. Furthermore, FAA's approval of an updated Master Plan must include approval of LAWA's revised passenger forecast for LAX. AC at 8 ("master plan forecast should be reviewed to ensure that the underlying assumptions and forecast methodologies are appropriate" including consistency of applicant's passenger forecast with FAA terminal area forecast ("TAF")). The effects of a Master Plan update on the human environment must be part of LAWA's ongoing NEPA analysis of the LAMP Project.

[5] Regardless, the proposed revisions to the ALP are not disclosed anywhere in the DEIR. *See* DEIR at 4.8-37 (stating inaccurately that "an amendment to the LAX Airport Layout Plan" is "further described below"). Although a revised master plan is required pursuant to FAA guidance, as explained above, LAWA must at the least disclose its proposed revisions to the existing ALP.

**Response:** Contrary to the commentor's assertion, there is no FAA requirement for preparation or amendment of an Airport Master Plan. FAA Advisory Circular 150/5070-6B, Airport Master Plans, specifically states in Paragraph 201 that the FAA does not require airports to prepare master plans.[1] LAWA has been working closely with the FAA on the evaluation of the LAX Landside Access Modernization Program, as evidenced by the Notice of Public Scoping Meeting for the Environmental Assessment for the proposed Project published in local newspapers (the Los Angeles Times, Argonaut, and Daily Breeze) in June 2016, and the scoping meeting for the proposed Project held on June 22, 2016. LAWA submitted an amended Airport Layout Plan to FAA for review and evaluation in August 2016. The proposed amended Airport Layout Plan depicts the proposed LAX Landside Access Modernization Program as identified in Chapter 2,

Description of the Proposed Project, of the Draft EIR. It also includes, as potential future development, the present and future probable projects at LAX that are identified in Table 3-1, on pages 3-9 through 3-12 of Chapter 3, Overview of Project Setting, of the Draft EIR. The FAA NEPA analysis will identify and analyze the potential effects of the LAX Landside Access Modernization Program on the environment in accordance with FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*.[2,3] FAA conditionally approved the ALP in November 2016, pending completion of the NEPA process, and is not requiring LAWA to prepare an Airport Master Plan or amendment to the LAX Master Plan. See also Response to Comment LAMP-AL00008-20.

[1] U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5070-6B, Change 2, Airport Master Plans, January 27, 2015, Chapter 7 Aviation Forecasts, Available: https://www.faa.gov/documentlibrary/media/advisory_circular/150-5070-6b-change-2-consolidated.pdf.

[2] U.S. Department of Transportation, Federal Aviation Administration, Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions, effective April 28, 2006, Available: https://www.faa.gov/airports/resources/publications/orders/environmental_5050_4/.

[3] U.S. Department of Transportation, Federal Aviation Administration, Order 1050.1F, Environmental Impacts: Policies and Procedures, effective July 16, 2015, Available: https://www.faa.gov/regulations_policies/orders_notices/index.cfm/go/document.current/documentnumber/1050.1.

**LAMP-AL00008-23**

**Comment:** **VI. The Project Will Result in Noise Impacts that Must Be Adequately Analyzed in the DEIR.**

The DEIR's noise analysis purports to evaluate the Project's contribution to three "types" of noise—road traffic noise; construction traffic noise and equipment noise and vibration; and transit noise and vibration—as well as cumulative noise impacts. Yet, because the DEIR takes the flawed position that the Project will not contribute at all toward higher passenger capacity at LAX, it fails even to consider the potential for increased aviation noise resulting from the Project-enabled growth in passengers and aircraft operations. The exclusion of any significance determination or analysis regarding this noise impact, and the individual and cumulative impacts on people at LAX and adjoining neighborhoods, is a fatal flaw. The DEIR must be revised to resolve this obvious deficiency under CEQA.

**Response:** Please see Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, and LAMP-AL00008-8. The proposed LAX Landside Access Modernization Program Project would not affect or change any airfield components, including the runways, taxiways, or aircraft arrival and departure procedures, and thus would not increase the overall capacity of LAX. The proposed LAX Landside Access Modernization Program Project would not result in any change to aircraft operations, thus would have no effect on aircraft noise. The Draft EIR correctly assesses the effects of construction, traffic, and rail noise in Section 4.9, Noise.

**LAMP-AL00008-24**

**Comment:** As explained above, because all previous planning documents for LAX contemplated a maximum operational capacity of 78.9 MAP, the DEIR must evaluate and mitigate any aviation-related noise impacts on El Segundo residents that result from growth beyond 78.9 MAP. Current measures to mitigate aviation noise from LAX operations are scaled at 78.9 MAP and are not designed to address aviation noise at higher passenger levels. *See, e.g.,* Exhibit M, 2014 Annual Progress Report, LAX Master Plan Mitigation Monitoring & Reporting Program, at 18 (stating LAX Aircraft Noise Mitigation Program designed to mitigate land uses that would be rendered incompatible by noise impacts associated with implementation of the LAX Master Plan).

**Response:** Please see Responses to Comments LAMP-AL00008-2 and LAMP-AL00008-23. The commentor also asserts that current measures to mitigate aviation noise from LAX operations are scaled to 78.9 MAP and are not designed to address aviation noise at higher passenger levels. Contrary to this assertion, the existing noise mitigation program is an ongoing effort which takes into account changing noise conditions.

The commentor appears to be referencing the "Aircraft Noise Mitigation Program," otherwise known as the "ANMP," "Residential Sound Insulation Program," "RSI," or "MM-LU-1." One of the purposes of this program is to provide for "sound insulation of structures." This program was adopted in 1987, updated in 2001 (Board of Airport Commissioners' Resolution 21481), and incorporated as a mitigation measure for the 2004 LAX Master Plan (Mitigation Measure MM-LU-1).

These concepts were expressly incorporated into MM-LU-1, which provides in part:

> "Ongoing monitoring and provision of annual updates in support of the requirements of the current LAX Noise Variance pursuant to the California Airport Noise Standards, with the updates made available (upon request) to affected local jurisdictions, the Airport Land Use Commission of Los Angeles County, and other interested parties… Upon completion of acquisition and/or soundproofing commitment under the current Program, expand the boundaries of the ANMP as necessary over time. LAWA will continue preparing quarterly reports that monitor any expansion of the 65 CNEL noise contours beyond the current ANMP boundaries. Based upon these quarterly reports, LAWA will evaluate and adjust the ANMP boundaries, periodically as appropriate, so that the 65 CNEL noise contours expand, residential and noise sensitive uses newly impacted by 65 CNEL noise levels would be included within the Program."

Contrary to the assertions in the comment, the existing noise mitigation program is not tailored to 78.9 MAP. Instead, it is based on the noise levels reflected in the Part 150 Noise Exposure Map for current and 5-year conditions. As noted in Response to Comment LAMP-AL00008-21, LAWA recently completed a Part 150 Noise Exposure Map (NEM) Update[1] required by FAA in order for LAWA to continue aircraft noise mitigation efforts around LAX.

[1] ESA Airports, Los Angeles International Airport, Title 14, Code of Federal Regulations (CFR) Part 150 Noise Exposure Map Report Update, August 2015, Available: http://lawa.org/pdf/Final%20LAX%20NEM%20Entire%20Report.pdf.

**LAMP-AL00008-25**

**Comment:** Furthermore, the current Noise Exposure Map for LAX, approved at the end of 2015, does not anticipate operations at the levels made possible by the Project. *See* Exhibit N, Final Noise Exposure Map Report (August 2015), at 3-10 (stating current noise contour is based on review of

Master Plan Alternative D Report, Specific Plan Amendment Study, Midfield Satellite Concourse North Draft EIR, West Aircraft Maintenance Area Draft EIR, and various runway improvement project studies, all assuming operations at 78.9 MAP). In fact, LAWA states that the current Noise Exposure Map, which provides the basis for residential noise mitigation required by state law, assumes even lower passenger operations than LAWA expects to exceed this or next year, at approximately 77.1 MAP. *Id.* at G-4; *see id.* at G-19 (comments of City of El Segundo on Draft Noise Exposure Map Report, requesting explanation of passenger forecast assumed for NEM update).

**Response:** Please see Responses to Comments LAMP-AL00008-23 and LAMP-AL00008-24. The aircraft operation and passenger forecasts utilized for the runway safety area improvements and the noise exposure map (NEM) relied on the current FAA Terminal Area Forecast (current at the time of document development), just as the LAX Landside Access Modernization Program does. This represents the best available forecast information for LAX. The Part 150 Noise Exposure Maps (NEMs) produced in 2015 were developed in accordance with FAA guidance, which stipulates that NEMs be produced for existing conditions and for 5-years into the future, a much shorter time horizon than that used in the Draft EIR impact analyses. The NEMs are expected to be updated at least every 5 years and would capture any increases in actual and forecast activity during that process. Additionally, the LAX Landside Access Modernization Program utilized SCAG's aviation forecasts for the region for 2035. Please see Responses to Comments LAMP-AL00008-4 and LAMP-AL00008-8.

**LAMP-AL00008-26**

**Comment:** Thus, although LAWA might be tempted to modify the DEIR to assert that aviation noise impacts resulting from the Project would be adequately addressed by existing mitigation adopted as part of the Master Plan, that approach would fail because those measures were not designed to mitigate noise from the passenger levels LAWA anticipates by the time the Project is fully built. Because LAWA has not justified its claim that the Project would not cause any impacts related to higher passenger levels, the DEIR must be revised to include an analysis of the aviation noise impacts caused by the Project, not omit any discussion whatsoever of aviation noise impacts.

**Response:** Please see Responses to Comments LAMP-AL00008-23 through LAMP-AL00008-25.

**LAMP-AL00008-27**

**Comment:** Finally, the analysis of road traffic noise impacts is fundamentally flawed as a consequence of errors in the DEIR's analysis of transportation impacts. As explained below, the DEIR's analysis of transportation impacts underestimates these impacts for two overarching reasons: first, it assumes the Project has no bearing on future increases in aviation and passenger activity and, therefore, that the increase in vehicular trips in 2024 and 2035 would not be attributable to the Project. Second, the DEIR does not take into account the phenomenon known as "induced travel" or "generated traffic," discussed further below. The noise impact analysis must be revised to reflect road traffic noise impacts from an accurate estimation of vehicular trips, including "induced" vehicular trips, resulting from higher passenger activity caused by the Project.

**Response:** Please see Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, and LAMP-AL00008-8. The Draft EIR road traffic noise analysis accounts for all of the trips on the roadways associated with passenger activity levels in 2024 and 2035 based on the traffic model output identified in Section 4.12.2.2.5, Methodology and Modeled Scenarios, of Section 4.12.2, Off-Airport Transportation, of the Draft EIR. The traffic model accounted for growth in population, housing, employment, and passengers for both 2024 and 2035, including any induced growth.

Section 4.9.2.5 of Section 4.9, Noise, of the Draft EIR identifies the road traffic noise associated with the proposed Project in both 2024 and 2035.

The Draft EIR did not underestimate traffic volume or underestimate negative traffic impacts. Section 4.12.2 and Appendix O of the Draft EIR include detailed traffic analyses of operating conditions at 183 study intersections and 23 freeway segments in both phases for both horizon years 2024 and 2035, including growth associated with 86 Million Annual Passengers (MAP) in 2024 and 95 MAP in 2035 at LAX, as well as regional land use, socio-economic and demographic growth projections provided in SCAG's 2012 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS). The socio-economic and demographic growth projections were refined further to include related (background) projects growth, which was incorporated as part of the traffic study for the proposed Project.

The Draft EIR's Traffic Study's scope, assumptions, parameters and methodology were coordinated with Caltrans, City of Los Angeles, Metro, SCAG, County of Los Angeles, City of Inglewood, City of Culver City, City of El Segundo and LAWA at the commencement of the Study. As described on pages 4.12-72 to 4.12-74 and page 4.12-178 of the Draft EIR, a state-of-the-art travel demand forecasting model, based on the SCAG Regional Transportation Plan (RTP) 2012 Transportation Model and the City of Los Angeles' Westside Mobility Plan model, was prepared and traffic forecasts for 2024 and 2035 conditions with and without the proposed Project were developed. The SCAG and Westside Mobility Plan models include regional growth projections, including housing and employment data, based on Los Angeles Department of Transportation (LADOT) and SCAG growth projections for future horizon years (2024 and 2035). The model was refined to include network and Traffic Analysis Zone (TAZ) enhancements to include more refined roadway and land use systems in the Study Area. In addition, the model was updated to incorporate traffic data from 212 probable development projects in surrounding jurisdictions (see Table 3-2 in Chapter 3, Overview of Project Setting, of the Draft EIR*).* Therefore, the model includes background traffic volumes due to ambient area-wide growth for future horizon years, as well as changes in the transportation network (i.e., roads and intersections) during the same period. Utilizing the calibrated model, the future 2024 and 2035 conditions were forecast in a manner consistent with the SCAG's RTP and the City of Los Angeles Westside Mobility Plan Models.

Section 4.12.2 and Appendix O of the Draft EIR include detailed traffic analyses of operating conditions at 183 study intersections and 23 freeway segments in both phases for both horizon years 2024 and 2035, including growth associated with 86 Million Annual Passengers (MAP) in 2024 and 95 MAP in 2035 at LAX, as well as regional land use, socio-economic and demographic growth projections provided in SCAG's 2012 RTP/ Sustainable Communities Strategies (SCS). The socio-economic and demographic growth projections were refined further to include related (background) projects growth, which was incorporated as part of the traffic study for the proposed Project. Traffic impacts were evaluated using significance criteria adopted by the various jurisdictions (see Section 4.12.2.4.1 of the Draft EIR), and where required, mitigation measures were identified and recommended (see Section 4.12.2.9 of the Draft EIR). All these measures were coordinated with the affected jurisdictions.

**LAMP-AL00008-28**

**Comment: VII. LAWA Improperly Proposes to Modify LAX's Current Nighttime Curfew on Engine Run-Ups Without Any Environmental Analysis.**

The Master Plan calls for development of two ground run-up enclosures ("GRE"). Master Plan Addendum at 2-95, attached hereto as Exhibit O. Moreover, the 2010 Stipulated Variance approved by LAWA, El Segundo, and others provides that LAWA would design two GREs by

2015. *See In the Matter of Noise Variance Application for City of Los Angeles et al.,* Dept. of Transp. Case No. L2010041216 (ordering LAWA to design two GREs), attached hereto as Exhibit P. To date, LAWA has partly designed one GRE and constructed none. Although the LAMP has nothing whatsoever to do with aircraft maintenance or GREs, LAWA has hidden within the Project problematic changes to its policies regarding both.

Currently, LAX's Aircraft Noise Abatement Operating Procedures and Restrictions (Sept. 2010), attached hereto as Exhibit Q, prohibit engine run-ups— regardless of whether they are performed within a GRE—between the hours of 11 p.m. and 6 a.m. unless waived on a case-by-case basis. The DEIR states that "LAWA has committed, as part of the West Aircraft Maintenance Area Project, to restrict high-powered engine run up testing during nighttime hours; this policy would also be incorporated." DEIR at 7-3. However, LAWA is actually proposing to amend the LAX Plan (Appendix C) to state: "Continue to restrict high-powered engine run-up testing during the hours of 2300-0600, unless performed in a GRE." Appendix C (LAX Plan redline) at 15.

The unavoidable implication of this language is that if LAMP is approved, any number of high-powered engine run-up tests could proceed at any time (including late at night/early in the morning, when people are trying to sleep) as long as they are performed in a GRE (once built). This amendment would be a substantial change to how ground run-ups can be performed at LAX, yet LAWA's explanation of the proposed change in the DEIR does not make this clear and would likely expose area residents to more noise. Moreover, the proposed change bears no apparent relationship to airport ground access or the ground access improvements proposed as the LAMP. The only apparent explanation for the change is that LAWA finds the existing rules regarding ground run-ups to be too limiting and sees LAMP as an opportunity to make the desired modification. The DEIR may not propose such a change without providing any analysis of the noise impacts to El Segundo and other impacted communities associated with the proposed change. As such, the proposed change to existing ground run-up policy cannot be approved in reliance on the DEIR and should be deleted from LAMP.

**Response:** The Draft EIR initially indicated that LAWA intended to amend the LAX Plan (see page 15 in Appendix C, LAX Plan Revisions, of the Draft EIR), to make the restrictions on engine run-up testing consistent with construction of a future ground-run up enclosure (GRE). The proposed LAX Landside Access Modernization Program does not include construction of a GRE; LAWA is in the process of conducting a siting study to determine the best location for one or more GREs at LAX. At such time as the siting study is completed and recommended site(s) are selected, LAWA would conduct appropriate environmental analyses in compliance with CEQA and NEPA that would analyze the noise effects of engine run-ups during different times of the days and by different aircraft types. As such, LAWA is striking the changes to the LAX Plan related to ground run-ups, and retaining the existing language. Please see Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-AL00008-29**

**Comment:** **VIII. The DEIR's Analysis of and Mitigation for the Project's Impacts on Transportation Are Inadequate.**

**A. The DEIR Relies on Flawed and Unsubstantiated Assumptions to Conclude that the Project Would Cause the Vast Majority of Intersection Operations Outside the Airport to Improve.**

The DEIR concludes operations at the majority of intersections would improve under the "2024 With Project" compared with the "2024 Without Project" scenario. DEIR at 4.12-111. The DEIR also finds that the majority of intersections would improve under the "2035 With Project"

compared with the "2035 Without Project" scenario. *Id*. at 4.12-131. The validity of these conclusions is questionable for two key reasons. First, as explained above, the DEIR incorrectly asserts that the Project would have no bearing on future increases in aviation and passenger activity and, therefore, that the increase in vehicular trips in 2024 and 2035 would not be attributable to the Project. Second, the DEIR does not take into account the phenomenon known as "induced travel" or "generated traffic." Had the DEIR relied on accurate assumptions, the DEIR likely would have revealed a substantially greater number of significant impacts at off-airport intersections.[6]

[6] As noted earlier, we will submit supplementary comments once our traffic engineer completes his analysis of this section of the LAMP DEIR.

**Response:** See Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-8, and LAMP-AL00008-27. The commentor alleges that the Draft EIR does not account for "induced travel [demand]," without defining the term. The commentor also does not provide any evidence that the improvement of Airport access roads would cause any "induced growth" in non-Airport traffic.

The commentor does not provide any references or discussion of the detailed methodological discussion of the trip generation rates and methodology utilized in the Draft EIR. Contrary to the assertion in the comment, the analysis in the Draft EIR of road traffic accounts for all of the trips on the roadways associated with passenger activity levels, under existing conditions as well as cumulative conditions in 2024 and 2035 based on the traffic model output identified in Sections 4.12.1.2.4 through 4.12.1.2.7, 4.12.1.8.2, 4.12.1.9, and 4.12.2.2.5. As noted in these sections, the vehicle trip generation and distribution model estimates future traffic volumes on the Airport's roadway system based on future passenger activities and has been calibrated and validated. Furthermore, the cumulative scenario utilized highly conservative assumptions, including an assumption of 2 percent annual ambient growth per year, and adding additional specific projects on top of that cumulative growth rate, as outlined in Section 4.12.3.2.4.

Comments from the City of El Segundo on the traffic analysis contained in the Draft EIR were received on December 2, 2016. See Comment Letter LAMP-AL00012 and Responses to Comments LAMP-AL00012-1 through LAMP-AL00012-19.

**LAMP-AL00008-30**

**Comment:** **1. The DEIR Fails to Acknowledge that Ground Access Has Been an Obstacle to Increased Passenger Activity.**

The DEIR explains that the very essence of the proposed Project is to improve the efficiency of the ground access system at LAX. DEIR at 4.5-32. At the same time, the DEIR asserts that growth in passenger and aviation activity would be unaffected by the Project. There is ample evidentiary support that improvements in ground access at LAX would facilitate the expansion of passenger and aviation activity.

According to the DEIR, the passenger experience for those arriving or departing LAX is often severely compromised by extreme roadway congestion in LAX's central terminal area and on nearby streets. *Id.* at 1-8; 2-1. Indeed, unless they require international flights, at least some percentage of travelers currently seek to avoid trips to/from LAX as a result of this congestion. It is commonly known that if southern California passengers are able to fly at an airport other than LAX, they do so. *See, e.g.*, Trip Advisor webpage (*available at* https://www.tripadvisor.com/Travel-g32655-c160004/Los-Angeles:California:Bob.Hope.Airport.Aka.Burbank.Airport.html), attached hereto as Exhibit R

(best way to avoid traffic and crowds of people is to use Burbank's Bob Hope Airport, rather than LAX); FlyerTalk webpage (*available at* http://www.flyertalk.com/forum/southwest-airlines-rapid-rewards/1558208-flying-intoburbank-vs-lax-worth-hassle-changing-planes-phx-2.html), attached hereto as Exhibit S ("[Burbank] is a very easy airport to navigate into and out of. LAX is exactly the opposite" ).

By increasing roadway capacity at LAX, substantially increasing the amount of parking, and by adding a people mover/connection to public transport, the Project would significantly expand the capacity of the airport's landside access system. In turn, traffic flow would be facilitated and parking at the airport would become less of an obstacle. As a result, visitors who may have avoided LAX or taken shuttle buses in the past now have an incentive to use LAX and to travel to LAX by car.

LAWA itself confirms the relationship between ground access and airport capacity. The 2004 LAX Master Plan explains that the "most constraining component of an airport defines the practical capacity of the entire airport." LAX Master Plan at 1-3. LAX is a "complex system made up of components through which passengers and aircraft flow in a sequential order." *Id*. The Master Plan goes on to explain that passengers traveling on local roadways and on-airport roads as they depart or arrive at the airport are part of the airport's complex system. *Id.* Clearly, ground access is currently a significant constraint on the airport's capacity and is a constraint on aviation activity. While the precise number of passengers that would choose to use LAX as a result of the Project is unknown, the DEIR must make a good faith effort to evaluate the relationship between improved landside access and growth in passenger and aviation activity. The document must then evaluate the traffic impacts from the increased passenger activity levels.

**Response:** For a discussion of the assumed growth in passenger activity levels by the proposed Project, see Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, and LAMP-AL00008-8. Further in the first paragraph of this comment, the commentor suggests that "[t]here is ample evidentiary support that improvements in ground access at LAX would facilitate the expansion of passenger and aviation activity" but does not provide such evidence.

In the second paragraph, the commentor proceeds to cite a TripAdvisor.com article and a Flyertalk.com online forum discussion. It is unclear if the commentor is suggesting that these sources represent "evidentiary support" to their argument. According to their website, TripAdvisor is "the world's largest travel site, enabling travelers to unleash the potential of every trip. TripAdvisor offers advice from millions of travelers and a wide variety of travel choices and planning features with seamless links to booking tools that check hundreds of websites to find the best hotel prices."[1] On the other hand, FlyerTalk "features discussions and chat boards that covers the most up-to-date traveler information. An interactive community dedicated to your favorite topic: travel!"[2] Both sources provide personal opinions on how the Hollywood Burbank Airport (formerly known as Bob Hope Airport) is a better option than LAX. After reviewing these sources, it is important to note, as cited by the commentor in Comment LAMP-AL00008-4, in the fifth paragraph that "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate ... does not constitute substantial evidence." Cal. Code Regs., tit. 14 ("CEQA Guidelines"), § 15384(a)."

In the third paragraph of this comment, the commentor notes that the proposed Project "would significantly expand the capacity of the airport's landside access system", and that "visitors who may have avoided LAX...now have an incentive to use LAX". See Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-7, and LAMP-AL00008-8, which addresses these comments.

The content of the fourth paragraph of this comment is similar to Comment LAMP-AL00008-4; please refer to Response to Comment LAMP-AL00008-4. The commentor's assertion that "[w]hile the precise number of passengers that would choose to use LAX as a result of the Project is unknown" supports the discussion included in the Draft EIR and in Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, and LAMP-AL00008-8.

[1] TripAdvisor, *About TripAdvisor*, Available: https://www.tripadvisor.com/PressCenter-c6-About_Us.html; accessed on December 5, 2016.

[2] FlyerTalk, *About Us*, Available: http://www.flyertalk.com/help/about.php; accessed on December 5, 2016.

**LAMP-AL00008-31**

**Comment:** **2. The DEIR's Failure to Account for Induced Travel Is an Egregious Error.**

Again, the underlying purpose of the proposed Project is to relieve ground access congestion at LAX. DEIR at 2-7. The Project includes myriad roadway improvement projects that are intended to increase the capacity of the roadway system on and around the airport, and reduce traffic congestion. There is a direct relationship between increases in roadway capacity and induced vehicular travel.

This relationship is corroborated by the Surface Transportation Policy Project ("STPP") which cites a growing body of research showing that, in the long run, wider roadways actually create additional traffic, above and beyond what can be attributed to population increases and economic growth. *See* Surface Transportation Policy Project, ***Build It and They'll Come***, attached as Exhibit T. According to the STPP, 100 percent of additional vehicle miles travelled ("VMT") in Los Angeles County is attributable to "induced traffic." *Id*. This means that increases in roadway capacity actually induce additional traffic—it does not simply "accommodate" existing or predicted traffic.

The California Air Resources Board ("CARB") has also weighed in on the relationship between increases in highway capacity and induced travel. In its recent report entitled "Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions," CARB confirms that increased capacity induces additional VMT. *See* Exhibit U at 3. CARB attributes this phenomenon to the basic economic principles of supply and demand: adding capacity decreases travel time, in effect lowering the "price" of driving; when prices go down, the quantity of driving goes up (Noland and Lem, 2002). *Id*. at 2.

According to CARB, the induced-travel impact of roadway capacity expansion is generally measured with respect to the change in VMT that results from an increase in lane miles, determined by the length of a road segment and its number of lanes (e.g. a two-mile segment of a four-lane highway equates to eight lane miles). Effect sizes are usually presented as the ratio of the percent change in VMT associated with a one percent change in lane miles. The expectation is that this ratio, also called an "elasticity," will be positive: an increase in lane miles will lead to an increase in VMT. An elasticity of 1 or greater means that the new capacity is entirely filled by additional VMT, producing no reduction in congestion. *Id.* at 3.

**Response:** Please see Responses to Comments LAMP-AL00008-27 and LAMP-AL00008-29. The LAX Landside Access Modernization Program includes a number of facilities that would redistribute traffic from the CTA to locations east of the CTA. The roadway improvements that are proposed as part of the LAX Landside Access Modernization Program are proposed to facilitate access to

these new facilities and mitigate any traffic impacts caused by this shift in traffic from the CTA to the new facilities. The proposed Project would not widen or increase the capacity of highways or general purpose roads, so the studies and reports cited by the commentor are not directly applicable to the proposed LAX Landside Access Modernization Program. The proposed roadway improvements associated with the Project would provide access to the proposed Airport-related transportation facilities or mitigate significant impacts as identified in Section 4.12.2, Off-Airport Transportation, of the Draft EIR. The proposed Project would also result in a decrease in vehicle miles traveled (VMT), as identified in Section 4.5, Greenhouse Gas Emissions, of the Draft EIR. See specifically, Section 4.5.5.1.2, Operational Emissions. As noted in Response to Comment LAMP-AL00008-27, the Draft EIR road traffic noise analysis accounts for all of the trips on the roadways associated with passenger activity levels in 2024 and 2035 based on the traffic model output identified in Section 4.12.2.2.5, Methodology and Modeled Scenarios, of Section 4.12.2, Off-Airport Transportation, of the Draft EIR. The traffic model accounted for growth in population, housing, employment, and passengers for both 2024 and 2035, including any induced growth. See also Response to Comment LAMP-AL00008-71.

**LAMP-AL00008-32**

**Comment:** The proposed Project's increase in parking supply would also facilitate increased vehicular travel as there is a "consequential" connection between the amount of parking and driving. Researchers at the University of Connecticut have found compelling evidence that parking is a "likely cause" of increased driving. *See* "Effects of Parking Provision on Automobile Use in Cities: Inferring Causality," attached hereto as Exhibit V. As parking spots per building area increase, the amount of vehicle use also increases. Similar to induced vehicular travel, the more spaces there are to park, the more people will drive to reach them. In fact, the University of Connecticut researchers determined that as cities added more parking over the years, the share of commuters who drove to work increased. As a city goes from having about 20 parking spaces to 50 spaces per 100 people, the share of commuters driving rises from 60 percent to 83 percent. *Id*. at 7.

The Project would create a net increase of more than 18,000 spots at the two new Intermodal Transportation Facilities ("ITFs") and the Central Terminal Area ("CTA"), including 1,000 new employee-only spots at CONRAC. DEIR at 2-83, -105, -125, -153. Adding almost 20,000 new parking spaces would certainly remove a constraint to traveling by automobile to LAX.

**Response:** Parking spaces are provided to support various land uses to accommodate the automobile trips that are made to and from those specific land uses. Parking lots do not generate the need to make trips nor do they generate automobile trips by themselves. The traveler's mode choice is based on a number of factors including but not limited to availability of and accessibility to transit, the cost of travel, and the cost of parking. Provision of parking is also directly related to the need or parking demand associated with automobile trip generation of uses that the parking supports.

The study referred to in the comment does not seem to take into account several key elements affecting mode choice nor does it recognize the possibility of increased automobile travel (due to increased density or demographics) leading to increased parking provisions. The study, on the other hand, generally examines on a regional scale the number of parking spaces per resident and employee and automobile mode split for commute trips - without examining the availability of and accessibility to transit and potentially the increased automobile trips due to intensification of land uses leading to an increased supply of parking reflected in the databases used in the study.

Notwithstanding these considerations, employee trips to LAX and its facilities (commute trips) account for approximately 10 percent of the overall peak hour trips. A large proportion of the total number of the peak hour LAX and facilities trips are made by air passengers or visitors who pick-up or drop-off passengers, which equates to two trips per pick-up or drop-off (vehicle driving to

LAX and a vehicle driving from LAX).[1] If passengers choose to park their car rather than be driven to and from the Airport, half of those trips would be eliminated in the peak hour. Based on the passenger surveys, a majority of the passengers use automobiles to and from LAX. Additionally, cargo trips are also trips that are primarily made by automobiles and trucks.

The parking spaces at the ITFs and CONRAC that are being planned are primarily meant to serve air passengers for both short-term as well as long-term usage (sometimes greater than one week). From the air passenger surveys conducted over the last decade,[2] it can be observed that a majority of the passengers utilize personal automobiles, transportation network companies (Uber, Lyft, etc.), taxis, super-shuttles and limousines. The additional parking spaces at the ITFs have been provided along with an APM train station adjacent to them to optimally transport them to the terminals while satisfying the potential long-term and short-term parking demands (needs) associated with increased passenger activity at the Airport. The trip generation associated with the ITFs, including parking spaces at the ITFs, has been accounted for in the traffic analysis as shown in Draft EIR Section 4.12.2.2.5, Tables 4.12.2-7 and 4.12.2-8 for 2024 and 2035, respectively. As discussed in that section and Appendix O, the trip generation and distribution model used in the Draft EIR was developed to estimate future traffic volumes on the Airport's roadway system based on future passenger activities, and has been calibrated and validated. The number of ITF parking spaces was designed to accommodate vehicle trips independently predicted by this model; the ITF parking spaces accommodate these trips, but do not cause these trips to occur.

If these parking spaces are not provided by the proposed Project, as indicated in Section 5.4.2.1 of the Draft EIR, it is likely that the private sector would increase its stock of Airport parking instead to meet market demand. Both the demand and the supply of land is available to drive this privately-owned parking. Potential for parking intrusion in the neighborhoods could also increase, with lack of availability of convenient parking spaces adjacent to the Airport. Addition of the parking spaces at the ITFs is being proposed to encourage use of the ITFs by Airport passengers and provide traffic relief on the CTA and surrounding roadways, as well as address the anticipated parking needs for future air passengers and reduce the potential for increased secondary trips to the terminals and neighborhood parking intrusion.

[1] Applied Management and Planning Group, 2006 Air Passenger Survey Final Report Los Angeles International Airport, conducted between July 31 and August 27, 2006 (peak) as well as October 03 and October 22, 2006 (non-peak), December 2007; Unison Consulting Inc., Los Angeles International Airport 2011 Passenger Survey, conducted between August 22 and August 28, 2011 (peak) as well as October 17 and October 24, 2011 (non-peak), August 2012; Unison Consulting Inc., Final Report, Los Angeles International Airport 2015 Passenger Survey Results and Findings, February 2016.

[2] Applied Management and Planning Group, 2006 Air Passenger Survey Final Report Los Angeles International Airport, conducted between July 31 and August 27, 2006 (peak) as well as October 03 and October 22, 2006 (non-peak), December 2007; Unison Consulting Inc., Los Angeles International Airport 2011 Passenger Survey, conducted between August 22 and August 28, 2011 (peak) as well as October 17 and October 24, 2011 (non-peak), August 2012; Unison Consulting Inc., Final Report, Los Angeles International Airport 2015 Passenger Survey Results and Findings, February 2016.

**LAMP-AL00008-33**

**Comment:** Because the DEIR does not take into account induced travel, it underestimates the increase in traffic that would accompany the proposed Project. Consequently, the DEIR understates the Project's impact on nearby roadways, intersections, and freeways. The DEIR should be revised to accurately account for the traffic that would be generated by the Project and evaluate how this traffic would impact the off-airport roadway system.

**Response:** Please see Responses to Comments LAMP-AL00008-27, LAMP-AL00008-31 and LAMP-AL00008-32.

**LAMP-AL00008-34**

**Comment:** **B. The DEIR's Analysis of the Project's Construction-Related Traffic Impacts is Sorely Lacking.**

One would expect that an EIR's evaluation of a project's construction-related impacts would be commensurate with its size and scope. Given the massive scale of this construction project and its prolonged duration (18 years!), the DEIR should have comprehensively analyzed its potential to disrupt the local and regional transportation network. Unfortunately, the document's analysis is shockingly deficient. The analysis is hamstrung because it: (1) does not study all of the roadways or intersections that would likely be impacted by the construction activities; (2) focuses largely on the number of vehicular and truck trips that would be generated by construction activities while giving short shrift to how traffic flow would be managed on roadways in and around the airport; and (3) fails to identify mitigation measures capable of effectively minimizing the Project's construction-related traffic impacts.

**Response:** The Draft EIR provides a discussion of construction phasing in Section 2.6, which includes deliveries during off-peak hours. An in-depth construction traffic analysis was also included in Section 4.12.3.

(1) The study area for the construction surface transportation analysis is discussed in Section 4.12.3.3.2 of the Draft EIR. As discussed, the geographic scope of the construction traffic study area was determined by identifying the intersections most likely to be used by construction-related vehicles accessing a) the proposed Project construction site, construction employee parking areas, and delivery staging areas and b) the construction employee parking and staging areas for other concurrent construction projects in the vicinity of LAX. Construction delivery vehicle travel paths would be regulated according to the construction traffic management plan detailed in Section 4.12.3.8 of the Draft EIR.

(2) Furthermore, the construction-related trips are comprised of three sources of traffic that affect the off-Airport roadway system consisting of truck delivery trips, construction employee trips, and shuttle bus trips required to transport employees to/from their assigned parking areas to their construction site. In accordance with the travel paths as shown in Figure 2-50 of the Draft EIR, truck delivery trips would be required to use the freeway system to access the Airport. As a result, these truck trips will have no effect within the study area except those in the direct route between the freeway terminus points and the staging areas. Section 4.12.3, Construction Surface Transportation, of the Draft EIR is largely intended to address the impacts of construction traffic on the off-Airport roadway network, while lane closures, detours, and general traffic flow is discussed in Section 4.12.3.7.4 and would be addressed in the Worksite Traffic Control Plans developed prior to construction (described in Section 4.12.3.8, Mitigation Measure MM-ST (LAMP)-3).

(3) The implementation of the mitigation measures identified in Section 4.12.3.8 effectively mitigate the identified construction traffic-related impacts, as shown in Tables 4.12.3-9 and 4.12.3-10 of the Draft EIR. As shown, each identified construction traffic-related impact would be mitigated to a level that is less than significant. Additionally, LAWA has identified five mitigation measures in Section 4.12.3.8 of the Draft EIR to address potential impacts to vehicle traffic during construction.

Similar to these measures, mitigation measures proposed for the LAX Landside Access Modernization Program include Mitigation Measures MM-ST (LAMP)-2, 3, 4, and 5. (see pages 4.12-240 and 4.12-241 of the Draft EIR.) Among other things, these measures include provisions for detours, limitations on roadway closures, construction management plans, including signage, noticing, flaggers, sequencing limits, and requirements to comply with the California Manual on Uniform Traffic Control Devices (MUTCD).[1] As part of these MUTCD requirements, there are provisions for coordination with local emergency services, training for flagman for emergency vehicles traveling through the work zone, temporary lane separators that have sloping sides to facilitates crossover by emergency vehicles, and vehicle storage and staging areas for emergency vehicles. MUTCD requirements also provide for construction work during off-peak hours and flaggers. These requirements also include provisions for "Detour for Bike Land on Roads with Closure of One Travel Direction." The same types of measures have been successfully implemented on numerous LAX projects, including the Bradley West Project, Central Utility Plan Project, Crossfield Taxiway Project, and South Airfield Improvements Project, etc. These types of measures are ideal for handling construction roadway conditions that are likely to change from day to day over the duration of the construction period.

[1] California State Transportation Agency, Department of Transportation, California Manual on Uniform Traffic Control Devices, FHWA's MUTCD 2009 Edition, including Revisions 1 & 2 as amended for use in California, 2014 Edition (including Revision 1), November 7, 2014, Available: http://www.dot.ca.gov/trafficops/camutcd/docs/CAMUTCD2014_rev1_hires.pdf.

**LAMP-AL00008-35**

**Comment:** The DEIR does not address all of the locations where construction of the LAMP would be expected to impact local and regional traffic because the DEIR's s study area barely extends beyond the airport's boundaries. The study area for purposes of analyzing the Project's construction-related traffic impacts is generally bounded by I-405 to the east, I-105 and Imperial Highway to the south, Pershing Drive to the west, and Westchester Parkway, Sepulveda Boulevard, and Howard Hughes Parkway to the north and *includes only 29 intersections*. *See* DEIR Figures 4.12.3-1 and 4.12.3-2, and DEIR pgs. 4.12-202—205. The DEIR's study area for assessing the Project's operational traffic impacts, on the other hand, is substantially larger, covering 183 intersections. *Id*. at 4.12-48 and Figure 4.12-2-1.

The DEIR explains that the geographic scope of the construction traffic analysis's study area was determined by identifying the intersections most likely to be used by construction-related vehicles accessing the Project's construction site. DEIR at 4.12-197, 4.12-202. Because the DEIR focuses largely on the number of construction employee and truck trips and the roads that would be used by these construction-related vehicles, the document arrives at the absurd conclusion that construction of this massive project would cause significant traffic impacts at only *one intersection*, Aviation Boulevard and Century Boulevard. *Id*. 4.12-232. This conclusion is not credible.

**Response:** The commentor implies that because the geographic scope of the construction traffic analysis is not the same as the operational analysis that it is not credible and suggests that the geographic scope of the construction traffic analysis "barely extends beyond the airport's boundaries."

The number of intersections selected for the LAX Landside Access Modernization Program operational analyses in Sections 4.12.1 and 4.12.2 differ from the intersections selected for the construction surface transportation analysis due to the level and type of trip generation associated with Project construction traffic versus Project operational traffic.

The study area for the off-Airport operational transportation analysis is discussed in the Draft EIR starting on page 4.12-48 in Section 4.12.2.2.1. As discussed therein, "[T]he off-Airport traffic analysis study area (Study Area) was delineated through coordination with the local jurisdictions…The Study Area encompasses approximately 75 square miles…The Study Area was delineated to ensure all intersections that could experience significant impacts were analyzed." These operational trips are also associated with many different locations around the Airport with origin/destination associated with individual travelers, including the CTA, Airport parking lots, employee parking lots, rental car facilities, off-Airport parking, etc. Given the numerous trip types associated with different uses on the Airport, the coverage required for intersection analysis is more extensive than for construction traffic.

The study area for the construction traffic analysis is discussed in the Draft EIR starting on page 4.12-194 in Section 4.12.3.2.1. As explained therein, "[t]he construction traffic study area includes intersections and roadways that would be directly or indirectly affected by construction of the proposed Project…The construction traffic study area for this analysis includes those roads and intersections that would most likely be used by employee and truck traffic associated with construction of the proposed project…The construction traffic study area depicted in Figure 4.12.3-1 [approximately 12 square miles in area] was defined to incorporate the local area roadways that serve as the primary travel paths that would be used by construction traffic to access the proposed Project site, equipment, materials staging, and parking areas." The geographic scope is also based upon the construction haul routes, which are shown in Figure 2-50 of the Draft EIR which would all utilize the adjacent freeways, which were included in the construction traffic analysis. These types of haul route designations have been successfully implemented on other LAX projects pursuant to LAX's existing measures such as ST-16 "Designated Haul Routes" and ST-18 "Construction Traffic Management Plan." Furthermore, construction traffic volumes are substantially lower than operational trips. As indicated in Table 4.12.3-4 of the Draft EIR, construction trips during the peak hour provide a maximum of 81 trips in and 81 trips out over the various intersections. This volume is substantially less than the operational trips identified in Table 4.12.2-7.

As stated in Section 4.12.3.3 of the Draft EIR, the analysis time periods were based on those hours at the start of the AM and PM commuter peak periods, which were defined as 7:00 AM to 8:00 AM (AM Peak) and 4:00 PM to 5:00 PM (PM Peak). Furthermore, a construction schedule was developed to estimate the shift times to be implemented during construction of the proposed Project, which vary based on the type and location of construction. Shift times were established to avoid the commuter peak hours in order to limit the impact of construction vehicles on the area roadway network. Therefore, it was estimated that no construction employee traffic would be on area roadways during the start of the commuter peak periods as construction employees would be required to have either arrived or departed the staging lots outside of the commuter peak periods.

The traffic analysis for the Draft EIR was prepared using a conservative approach that is intended to identify potential traffic-related impacts resulting from the construction of the Project, in particular, the construction traffic associated with the Project. The construction traffic analysis

was prepared by analyzing the anticipated traffic conditions during the peak construction activity that would likely occur over the course of the Project. The detailed summary of the construction traffic analysis is provided in Section 4.12.3 of the Draft EIR, with supporting technical data and analysis provided in Appendix P.

**LAMP-AL00008-36**

**Comment:** While it may be sufficient to focus on construction vehicular trip generation for a land use project such as a subdivision or a shopping center, this type of analysis is not sufficient for assessing impacts of a long term, multi-faceted construction project at one of the nation's busiest airports. About 76,000 vehicles per day entered LAX's central terminal area in 2014-15 and more than 6,000 vehicles enter the airport every hour.[7] DEIR at 1-2. Certainly one would expect massive traffic jams on roadways and intersections periodically throughout the 18-year construction, especially because the Project includes so much road construction. Over the Project's duration, certain roads would be closed, other roads would be removed, new roads and new lanes would be added, segments of existing roads would be realigned, freeway ramps would be modified, new driveways would be constructed, other driveways would be realigned; and numerous intersections would be improved. DEIR at 4.12-24; 2-181, 182.

Towards the end of the 50-page construction analysis, the DEIR includes a two-page section entitled "Temporary Traffic, Access, and Transit Impacts During Construction." DEIR at 4.12-234. This "analysis" purports to address the effect that construction activities would have on on-Airport and off-airport traffic roadway operations. *See id*. Yet, rather than provide a substantive evaluation, the DEIR's discussion is vague and generic, as evidenced by the following statement:

> To the extent that Project-related construction within the CTA would require temporary lane closures and detours, on-Airport traffic conditions could be impacted. Construction-related impacts to the on-Airport surface transportation system could result in substantial congestion and inconvenience to motorists and pedestrians on a regular or frequent basis.

DEIR at 4.12-237.

Clearly, construction of the Project would cause extensive traffic jams on airport access routes resulting from reduced roadway capacity, limited access to parking garages, reduced parking capacity, and construction vehicles completing with airport travelers for roadway space. The EIR's failure to thoroughly evaluate these impacts is a fatal flaw.

[7] *See* "A Better Flight Plan for LAX: L.A. Controller's Report Warns of Impending Traffic Crisis; Urges Improved Passenger Experience, Business Practices," *available at* http://www.lacontroller.org/lawa (last visited October 10, 2016).

**Response:** Please see Responses to Comments LAMP-AL00008-34 and LAMP-AL00008-35. As stated in Section 4.12.3.4.1 of the Draft EIR, construction vehicles (employees and truck trips) were estimated on an hourly basis over a typical busy day. Workforce levels were based on a review of the proposed Project construction estimates, which also included specific construction elements and employees per shift. The commentor also asserts that the impact analysis and conclusions are "vague." The Draft EIR provided clear significance conclusions. The construction traffic analysis consisted primarily of two categories of information (compare Sections 4.12.3.6 and 4.12.3.6.4): (1) operational Level of Service data for example, Table 4.12.3-7 of the Draft EIR clearly asks whether the project (prior to mitigation), would have a significant impact, and answers "Yes." The Draft EIR also disclosed whether the proposed Project would result in temporary lane, alley or street closures and clearly concluded on page 4.12-238 of

the Draft EIR that "[I]mpacts to traffic, access, and transit during construction would therefore be significant."

As noted by the commentor, the Project does include roadway construction, which requires roadways to be closed, removed, added, realigned, modified, and/or improved. As stated in Section 4.12.3.8, Mitigation Measure MM-ST (LAMP)-3, prior to construction, Worksite Traffic Control Plans would be developed to assist in traffic maintenance during construction. As stated in Section 4.12.3.7.4 of the Draft EIR, Project-related construction outside the CTA would require temporary lane closures and detours, particularly when roadway improvements to Century Boulevard, Airport Boulevard, Aviation Boulevard, Arbor Vitae Street, and W. 98th Street are constructed and when the APM guideway is constructed over existing streets. As stated in Section 4.12.3.7.4 of the Draft EIR, construction-related impacts to the off-Airport surface transportation system could result in substantial congestion and inconvenience to motorists and pedestrians on a regular or frequent basis. Construction activity outside of the CTA would occur during two 8-hour shifts/work day (16 hours/day): a morning shift from approximately 7 a.m. to 3 p.m., and an evening shift from approximately 3 p.m. to 11 p.m. For construction of the APM guideway outside of the CTA, approximately 60 percent of construction would occur during the morning shift and 40 percent during the evening shift. For construction of all other elements (excluding the APM guideway), approximately 80 percent would occur during the morning shift and 20 percent during the evening shift. To the extent feasible, most lane closures would occur during off-peak and evening hours. Construction activities during the day shift would largely consist of activities that could proceed without requiring lane closures or significantly disrupting area traffic.

**LAMP-AL00008-37**

**Comment:** Rather than conduct a thorough analysis, the DEIR identifies a few vague mitigation measures. DEIR at 4.12-238 and 4.12-241. For example, the DEIR calls for the establishment of a task force to monitor traffic conditions and for the eventual preparation of a worksite traffic control plan. *Id*. Unfortunately, the DEIR lacks the required evidentiary support that these measures—which essentially punt the problem to a later date—would even begin to address the complexities and challenges that would accompany this major construction project. Indeed, the DEIR's approach is a "mere expression[] of hope" that LAWA will be able to devise a way around the problems created by construction of this massive Project. *Lincoln Place Tenants Assn v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508. Deferring mitigation without clear performance standards contravenes CEQA's clear requirements. "[F]or kinds of impacts for which mitigation is known to be feasible, but where practical considerations prohibit devising such measures early in the planning process . . . , the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval." *Sacramento Old City Assn v. City Council* (1991) 229 Cal.App.3d 1011, 1028-29. Here, the DEIR includes no performance standards.

**Response:** No other feasible mitigation measures have been identified at this time in regards to temporary lane, alley, or street closures. As stated in Section 4.12.3.9 of the Draft EIR, "significant impacts associated with temporary lane, alley, or street closures, loss of regular vehicular or pedestrian access, and temporary loss for more than one day of an existing bus stop or rerouting of a bus route would be reduced, but may not to a level that would be less than significant. No other feasible mitigation measures have been identified at this time that would reduce impacts further. Therefore, impacts associated with temporary lane, alley, or street closures, loss of regular vehicular or pedestrian access, and temporary loss for more than one day of an existing bus stop or rerouting of a bus route from Project-related construction would be significant and unavoidable." However, mitigation measures which reduce those significant impacts due to construction-related vehicles have been identified and are presented in Section 4.12.3.8. With

implementation of Mitigation Measures MM-ST (LAMP)-1, MM-ST (LAMP)-2, MM-ST (LAMP)-3, MM-ST (LAMP)-4, and MM-ST (LAMP)-5, the Project-related construction traffic impacts on area intersections would be reduced to a level that is less than significant. Please also see Response to Comment LAMP-AL00008-34 for further discussion regarding the adequacy of the construction traffic mitigation measures.

**LAMP-AL00008-38**

**Comment:** Moreover, given LAWA's current lackluster performance at handling traffic congestion around LAX, there is no evidence that the agency is even capable of effectively mitigating the effects of such a complex construction project. As the Supreme Court explained, "[b]ecause an EIR cannot be meaningfully considered in a vacuum devoid of reality, a project proponent's prior environmental record is properly a subject of close consideration in determining the sufficiency of the proponent's promises in an EIR." *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376, 420. A performance review of LAX, prepared on behalf of the City of Los Angeles Office of the Controller ("LA Controller Report"), determined that LAWA is not prepared to handle the problems created by construction of the LAMP. *See* "Industrial, Economic, & Administrative Survey Report of Los Angeles World Airports" (Feb. 2016), attached hereto as Exhibit W, at 1.77-1.78. The LA Controller Report explains that the lack of an organizational focus on the landside operations appears to be one of the most serious faults with the operations of LAX. No one unit or individual is currently responsible "for coordinating the systems needed to keep traffic flowing during construction." *Id*. The report goes on to explain that LAWA has historically devoted insufficient staffing to manage its landside system, and it lacks the dedicated traffic engineering expertise to properly handle the airport's on-going congestion problems, let alone a project of LAMP's scale and scope. *Id*. at 1.78.

**Response:** This comment is similar to comments LAMP-AL00008-42 and LAMP-AL00008-46; please refer to Responses to Comments LAMP-AL00008-42 and LAMP-AL00008-46 below. LAWA will have sufficient organizational and staffing to successfully implement the LAX Landside Access Modernization Program EIR construction traffic mitigation measures. Proposed Project procurements would provide contractual mechanisms to require that these mitigation measures be successfully implemented and enforced. Please also see Response to Comment LAMP-AL00008-34 for further discussion regarding the adequacy of the construction traffic mitigation measures.

**LAMP-AL00008-39**

**Comment:** LAWA can and should consider and approve specific mitigation measures that would reduce the Project's construction-related traffic impacts. The LA Controller Report identified numerous actions that LAWA should undertake to manage the disruptions that would inevitably occur during the Project's construction:

**Response:** Please see Responses to Comments LAMP-AL00008-40 through LAMP-AL00008-48, which address each of the proposed measures.

**LAMP-AL00008-40**

**Comment:** • LAWA's Chief Executive Officer should establish a single point of responsibility for day-to-day landside operations (terminal, traffic, and parking).

**Response:** LAWA will have sufficient organizational and staffing to successfully implement the LAX Landside Access Modernization Program EIR construction traffic mitigation measures. Proposed Project procurements would provide contractual mechanisms to require that these mitigation measures

be successfully implemented and enforced. Whether LAWA appoints a single, point of responsibility for day-to-day landside operations has no bearing on the environmental effects of the proposed Project or the effectiveness of construction traffic mitigation measures.

**LAMP-AL00008-41**

**Comment:** • LAWA should form a joint-services team that includes Operations, Maintenance, & Emergency Management Group; Law Enforcement & Homeland Security; Traffic, Airports Development Group, and Commercial Development Group to:

- Plan and execute a coordinated landside operations strategy.
- Review and update its regulations and operational rules for landside operations.
- Build on the Airport Response Control Center's capabilities as a powerful platform for data-driven performance management.
- Begin evidence-based management of landside operations designed to:
  - Ensure rapid response to issues that arise during the service day.
  - Anticipate congestion and wherever possible deploy resources before it occurs.
  - Propose policies and procedures to reduce CTA vehicle congestion in peak periods.
  - Work closely with airlines and other airport tenants to establish and maintain guest service excellence.

**Response:** These concepts have already been incorporated into the proposed mitigation measures. As stated in Section 4.12.3.8 of the Draft EIR, LAWA would establish a Project Task Force specific to the LAX Landside Access Modernization Program that may be comprised of key stakeholders from LAWA, the Coordination and Logistics Management Team (CALM), other City departments, and others as deemed appropriate (MM-ST (LAMP)-1, as revised in Chapter 3, Corrections and Additions to the Draft EIR). Key responsibilities for the Task Force include providing input into worksite traffic control plans and other traffic management plans for necessary lane closures and detours, in addition to working with residential and commercial neighbors regarding upcoming construction activities in order to keep key stakeholders, businesses, and residents notified and informed during construction. Prior to initiation of construction, contractors would be required to complete Worksite Traffic Control Plans (MM-ST (LAMP)-3), which would include a description of how the contractor will manage all construction-related traffic; therefore allowing LAWA to be proactive in managing landside operations.

**LAMP-AL00008-42**

**Comment:** • LAWA should increase landside operations staffing levels by:

- Adding staffing to allow 24/7 coverage of terminal and landside operations.
- Increasing terminal and landside operations supervisory staff.
- Providing robust Traffic Officer and Airport Police staffing to carry out flexible manual traffic control during construction.

**Response:** LAWA will have sufficient organizational and staffing to successfully implement the LAX Landside Access Modernization Program EIR construction traffic mitigation measures. Proposed Project procurements would provide contractual mechanisms to require that these mitigation measures be successfully implemented and enforced. Whether LAWA landside operations staffing levels

has no bearing on the environmental effects of the proposed Project or the effectiveness of construction traffic mitigation measures.

**LAMP-AL00008-43**

**Comment:** • LAWA should assign overall APM construction impact coordination on the landside to a single position:

- LAWA should provide this position with sufficient planning and construction coordination resources to ensure that he/she is able to anticipate and address CTA traffic and parking capacity reductions during construction.
- This landside management position would have the scope to respond to Construction & Logistics Management plans and immediately react to identified shortcomings in execution.

**Response:** These concepts have already been incorporated into the proposed mitigation measures. As stated in Section 4.12.3.8 of the Draft EIR, LAWA would establish a Project Task Force specific to the LAX Landside Access Modernization Program that may be comprised of key stakeholders from LAWA, the Coordination and Logistics Management Team (CALM), other City departments, and others as deemed appropriate (Mitigation Measure MM-ST (LAMP)-1, as revised in Chapter 3, Corrections and Additions to the Draft EIR). Key responsibilities for the Task Force include providing input into worksite traffic control plans and other traffic management plans for lane closures and detours, in addition to working with residential and commercial neighbors regarding upcoming construction activities in order to keep key stakeholders, businesses, and residents notified and informed during construction. Prior to initiation of construction, contractors would be required to complete Worksite Traffic Control Plans (Mitigation Measure MM-ST (LAMP)-3), which would include a description of how the contractor will manage all construction-related traffic; therefore allowing LAWA to be proactive in managing landside operations.

**LAMP-AL00008-44**

**Comment:** • LAWA should include in its contract provisions with APM planning, construction, and operations contractor(s) that they:

- Have significant incentives for maintaining CTA capacity and substantial penalties for reducing it.
- Provide coordination staffing and performance requirements in APM construction contracts.

**Response:** LAWA would establish a Project Task Force specific to the LAX Landside Access Modernization Program that may be comprised of key stakeholders from LAWA, the Coordination and Logistics Management Team (CALM), other City departments, and others as deemed appropriate as outlined in the proposed mitigation measure (Mitigation Measure MM-ST (LAMP)-1, as revised in Chapter 3, Corrections and Additions to the Draft EIR). Key responsibilities for the Task Force include providing input into worksite traffic control plans and other traffic management plans for lane closures and detours, in addition to working with residential and commercial neighbors regarding upcoming construction activities in order to keep key stakeholders, businesses, and residents notified and informed during construction. Prior to initiation of construction, contractors would be required to complete Worksite Traffic Control Plans Mitigation Measure MM-ST (LAMP)-3, which would include a description of how the contractor will manage all construction-related traffic; therefore allowing LAWA to be proactive in managing landside operations.

Mitigation Measure MM-ST (LAMP)-4, Roadway Closure Restrictions, states that no designated major or secondary highway will be closed to vehicular or pedestrian traffic except at night or on weekends, unless approval is granted by the jurisdiction in which it is located.

Additionally, as stated on page 4.12-237 in Section 4.12.3, Construction Surface Transportation, of the Draft EIR, to minimize impacts to the CTA roadway system and Airport operations during construction, the Project components located within the CTA would be constructed over an 18-hour/day schedule with two shifts. The "night" shift would occur from approximately 1 a.m. to 9 a.m. and the "day" shift would occur from approximately 9 a.m. to 7 p.m., with minimal construction occurring between 7 p.m. and 1 a.m. Approximately 65 percent of construction activity within the CTA would occur during the 8-hour night shift, when traffic levels are low, and 35 percent would occur during the 10-hour day shift. Delivery of construction materials would occur during the night shift, as would most lane closures. Construction activities during the day shift would largely consist of activities that could proceed without requiring lane closures or significantly disrupting Airport operations.

The majority of the construction activity associated with the proposed Project within the CTA would primarily occur along the Center Way corridor; thus, curbside impacts along World Way in front of the passenger terminals would be minimized. A portion of the vehicular traffic exiting the parking structures along Center Way would be detoured to use World Way South, which may cause some vehicle congestion along World Way South.

Contractors working within the CTA would be required to adhere to these procedures so that access to the CTA for passengers is maintained at all times, with minimal disruption. Any work to be done within City streets must follow enforceable City provisions for performing work within the public right-of-way. Contracts with private entities responsible for construction will contain provisions to enforce the construction-related mitigation procedures, including penalties for noncompliance.

**LAMP-AL00008-45**

**Comment:** • LAWA should conduct periodic reviews of the construction process to learn from successes and failures, with the understanding that it may well be in order to change approaches if existing arrangements prove unworkable or ineffective.

**Response:** As indicated on pages 4.12-238 through 4.12-240 in Section 4.12.3, Construction Surface Transportation, of the Draft EIR, LAWA would establish a Project Task Force (Mitigation Measure MM-ST (LAMP)-1, Construction Traffic Project Task Force, as revised in Chapter 3, Corrections and Additions to the Draft EIR) specific to the LAX Landside Access Modernization Program. The Project Task Force would review the traffic management plans to ensure the following topics are considered:

- Coordination with all other LAWA construction projects;
- Coordination with other public infrastructure projects;
- Detour impact analysis for pedestrian, business, bicycle, and traffic flow;
- Coordinate closures and restricted access with all potential special events and holiday traffic flow;
- Notification to the public with use of static signage, changeable message signs, media announcements, Airport website, etc.;

- Work with LAWA police and the Los Angeles Police Department to enforce delivery times and routes;
- Coordinate with police and fire personnel regarding maintenance of emergency access and response times;
- Monitor and coordinate deliveries;
- Establish detour routes;
- Work with residential and commercial neighbors regarding upcoming construction activities; and
- Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

The Project Task Force would collaborate with the appropriate groups to develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction. The Task Force would work closely with other LAWA departments, including Public Relations, Planning and Development, and Operations. The Task Force would also ensure that an innovative and effective construction outreach and communication strategy is developed to keep key stakeholders, businesses, and residents notified and informed during construction of the proposed Project.

The Project Task Force would meet weekly to discuss issues that have arisen and plan for upcoming construction activities. Thus, weekly reviews of construction issues will be conducted and steps taken to ensure that any issues are addressed as quickly as possible. The process is structured to continuously collect, share and implement lessons learned from construction of the LAX Landside Access Modernization Program elements. Furthermore, these measures will be subject to the Mitigation Monitoring and Reporting Program prepared pursuant to State CEQA Guidelines Section 15097.

**LAMP-AL00008-46**

**Comment:** • LAWA should also establish or obtain traffic engineering capability:

- Traffic engineering should focus on:
  - Developing traffic mitigation plans.
  - Evaluating diversions for shuttle services and taxis/limos/vans and other strategies or systems that might help contain and manage CTA roadway congestion.
  - Conducting needs analyses based on projected traffic levels and designing construction-related diversions. (Note: Another possibility might be to include the needs analysis as part of LAMP in the contractors' specifications.)
- LAWA should engage traffic engineering expertise, based on a cost-benefit analysis of different options:
  - Option 1: LAWA staff. Recruit and build its own traffic engineering unit. - Option 2: LADOT. Retain the services of LADOT through an MOU that would reimburse the department for its expenses in compliance with FAA requirements for revenue use and BOAC action to review and approve such agreements. (Note: LADOT also has technical knowledge and experience in traffic design and control systems. LADOT has jurisdiction over the "upstream" systems that deliver traffic to LAX and some involvement in CTA traffic influx.)

- Option 3: Private contractor. Retain the traffic engineering services of a private contractor (LAWA should request LADOT to participate on the selection panel if this option is chosen).

**Response:** As indicated on pages 4.12-238 through 4.12-240 in Section 4.12.3, Construction Surface Transportation, of the Draft EIR, LAWA would establish a Project Task Force (Mitigation Measure MM-ST (LAMP)-1, Construction Traffic Project Task Force, as revised in Chapter 3, Corrections and Additions to the Draft EIR) specific to the LAX Landside Access Modernization Program. The Project Task Force would review the traffic management plans to ensure the following topics are considered:

- Coordination with all other LAWA construction projects;
- Coordination with other public infrastructure projects;
- Detour impact analysis for pedestrian, business, bicycle, and traffic flow;
- Coordinate closures and restricted access with all potential special events and holiday traffic flow;
- Notification to the public with use of static signage, changeable message signs, media announcements, Airport website, etc.;
- Work with LAWA police and the Los Angeles Police Department to enforce delivery times and routes;
- Coordinate with police and fire personnel regarding maintenance of emergency access and response times;
- Monitor and coordinate deliveries;
- Establish detour routes;
- Work with residential and commercial neighbors regarding upcoming construction activities; and
- Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

The Project Task Force would meet weekly to discuss issues that have arisen and plan for upcoming construction activities. Thus, weekly reviews of construction issues will be conducted and steps taken to ensure that any issues are addressed as quickly as possible.

Section 2.4.6 in Chapter 2, Description of the Proposed Project, of the Draft EIR identifies a number of measures that LAWA may implement to influence how passengers access the Airport, including potentially implementing tolls to manage traffic during peak periods. These measures may need to be implemented during construction of the proposed Project in order to maintain access to the CTA and minimize traffic congestion.

LAWA and construction contractors will have sufficient traffic engineering expertise to successfully implement the LAX Landside Access Modernization Program EIR construction traffic mitigation measures. Whether LAWA engages additional traffic engineering expertise has no bearing on the environmental effects of the proposed Project or the effectiveness of construction traffic mitigation measures.

**LAMP-AL00008-47**

**Comment:** • LAWA should train airport contract workers regarding Guest Experience initiatives, including wayfinding during construction.

**Response:** Related specifically to the proposed Project, and stated in Section 4.12.3.8 of the Draft EIR, LAWA would establish a Project Task Force specific to the LAX Landside Access Modernization Program that may be comprised of key stakeholders from LAWA, the Coordination and Logistics Management Team (CALM), other City departments, and others as deemed appropriate (Mitigation Measure MM-ST (LAMP)-1, as revised in Chapter 3, Corrections and Additions to the Draft EIR). Key responsibilities for the Task Force include providing input into worksite traffic control plans and other traffic management plans for lane closures and detours, in addition to working with residential and commercial neighbors regarding upcoming construction activities in order to keep key stakeholders, businesses, and residents notified and informed during construction. Prior to initiation of construction, contractors would be required to complete Worksite Traffic Control Plans (Mitigation Measure MM-ST (LAMP)-3), which would include a description of how the contractor will manage all construction-related traffic; therefore allowing LAWA to be proactive in managing landside operations.

- The Project Task Force would review the traffic management plans to ensure the following topics are considered:
  - Coordination with all other LAWA construction projects;
  - Coordination with other public infrastructure projects;
  - Detour impact analysis for pedestrian, business, bicycle, and traffic flow;
  - Coordinate closures and restricted access with all potential special events and holiday traffic flow;
  - Notification to the public with use of static signage, changeable message signs, media announcements, Airport website, etc.;
  - Work with LAWA police and the Los Angeles Police Department to enforce delivery times and routes;
  - Coordinate with police and fire personnel regarding maintenance of emergency access and response times;
  - Monitor and coordinate deliveries;
  - Establish detour routes;
  - Work with residential and commercial neighbors regarding upcoming construction activities; and
  - Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

The Project Task Force would collaborate with the appropriate groups to develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction, including Airport contract workers. The Task Force would work closely with other LAWA departments, including Public Relations, Planning and Development, and Operations. The Task Force would also ensure that an innovative and effective construction outreach and communication strategy is developed to keep key stakeholders, businesses, and residents notified and informed during construction of the proposed Project.

**LAMP-AL00008-48**

**Comment:** • LAWA should increase existing staffing and systems to ensure that the public is kept informed, preferably well in advance, of significant disruptions to CTA traffic arising from APM construction. *Id.* at 1.79-1.80. LAWA might build on the proven "Carmageddon" model of saturation notices used during the widening of the 405 through Sepulveda pass.

**Response:** Please see Response to Comment LAMP-AL00008-47 for discussion on communications to the public during construction of the proposed Project. As outlined therein, the concepts referenced in the comment have already been incorporated into the proposed mitigation measures.

**LAMP-AL00008-49**

**Comment:** **IX. The DEIR Fails to Properly Analyze or Mitigate the Project's Climate Change Impacts.**

**A. Analyzing Climate Change Impacts Is Required Under CEQA.**

The law is clear that lead agencies must thoroughly evaluate a project's impacts on climate change under CEQA. *See Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 89-91. In 2007, the state Legislature passed Senate Bill 97, which required the Governor's Office of Planning and Research to prepare guidelines "for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by [CEQA], including, but not limited to, effects associated with transportation or energy consumption." SB 97 (2007), codified as Pub. Resources Code § 21083.05. Consistent with this mandate, the state Natural Resources Agency adopted revisions to the CEQA Guidelines that require lead agencies to determine the significance of a proposed project's greenhouse gas emissions. Guidelines § 15064.4.

**Response:** The greenhouse gas (GHG) analysis completed for the proposed Project (Draft EIR, Section 4.5) meets the requirements of CEQA. The commentor's references to Senate Bill 97 and relevant provisions of CEQA and the State CEQA Guidelines are consistent with the information presented on page 4.5-11 of the LAX Landside Access Modernization Program Draft EIR. The Draft EIR's GHG analysis meets the applicable requirements for CEQA GHG analysis established by the State CEQA Guidelines and case law.

**LAMP-AL00008-50**

**Comment:** **B. The DEIR's Perfunctory Climate Change Analysis Fails to Inform the Public and Decision makers About the Project's GHG Emissions.**

The DEIR's discussion of the Project's contribution to climate change fails to achieve CEQA's most basic purpose: informing governmental decisionmakers and the public about the potential significant environmental effects of a proposed activity. CEQA Guidelines § 15002(a)(1). Among its other flaws, the DEIR: calculates only a portion of the construction-related GHG emissions for which the Project would be responsible; refuses to acknowledge or otherwise analyze GHG emissions that would clearly be caused by the Project's operation; fails to account for GHG emissions beyond 2035 despite the fact that the Project has a more than 30-year lifespan; relies on a faulty methodology that omits GHG emissions from the full distance that Project-related vehicles would travel; fails to adequately analyze conflicts with state and regional GHG reduction plans and policies; and fails to identify mitigation measures to reduce or avoid the Project's contributions to climate change. The DEIR's approach, which ignores science and law, stands in stark contrast to the conscientious treatment of climate change impacts undertaken by other lead

agencies throughout the state. LAWA must make substantial modifications to the DEIR's climate change analysis to achieve compliance with CEQA.

**Response:** The comment is an introduction to the more detailed comments that follow in comments LAMP-AL00008-51 through LAMP-AL00008-58. Please see Responses to Comments LAMP-AL00008-51 through LAMP-AL00008-58 below. The Draft EIR's analysis meets applicable CEQA requirements for GHG analysis established by the State CEQA Guidelines and case law.

**LAMP-AL00008-51**

**Comment:** **1. The DEIR Substantially Underestimates the Project's GHG Emissions.**

The DEIR fails to account for all the ways the Project will generate GHG emissions. For the Project's construction-related GHG emissions, the DEIR includes only direct emissions. The DEIR explains that indirect GHG emissions associated with construction activity such as purchased electricity, solid waste disposal, water usage and wastewater disposal were omitted from the Project's inventory because they are *negligible* compared to direct emissions. DEIR at 4.5-6. The DEIR provides no evidence, or even an explanation, as to why LAWA considers the indirect emissions to be negligible.[8] Moreover, even if the indirect construction-related GHG emissions are a fraction of the direct emissions—and there is no evidence that this is the case—this is not a valid excuse for not including them in the inventory. Because GHG emissions are a cumulative global effect, all sources of a Project's emissions must be included in the inventory.

[8] We found no indication that the Project's indirect construction-related criteria pollutant emissions were excluded from the DEIR's air quality analysis, leading one to further question why they were omitted from the GHG analysis. *See* DEIR chapter 4.2, generally.

**Response:** There is no evidence that the Draft EIR underestimates the proposed Project's GHG emissions. The commentor notes that the Draft EIR's greenhouse gas (GHG) emissions estimates do not include indirect emissions of GHGs associated with electricity and water demand and wastewater/solid waste disposal during construction. The California Emissions Estimator Model (CalEEMod) is an industry standard model developed specifically to calculate GHG emissions for development projects; CalEEMod includes the calculation of indirect GHG emissions for electrical demand during the construction phase, but only so far as to calculate electrical emissions from grid-powered (i.e., electric-powered) off-road equipment.[1] CalEEMod was created by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the SCAQMD and other air quality management districts.

In regards to indirect emissions from off-road, grid-powered construction equipment, CAPCOA's Quantifying Greenhouse Gas Mitigation Measures 2010 report, states that "…grid-based emissions are typically small compared to the emissions from the diesel-fueled equipment (depending on the source of grid power)."[2] For this reason, use of diesel-fueled equipment rather than grid-based is a conservative assumption. The LAX Landside Access Modernization Program emissions inventory assumes that off-road emissions sources which have the potential to be grid-based, such as painting carts, are to be diesel-fueled. Additionally, a large number of diesel-fueled generators are assumed to provide electrical power throughout the Project construction in lieu of grid-based power. By CalEEMod and CAPCOA's emissions calculation methodology, this is a conservative assessment of potential indirect construction emissions. This Draft EIR methodology also conservatively neglects to account for reductions in electrical, water, and solid waste demand through the demolition of previously operational structures during the construction phase.

The Draft EIR GHG analysis complies with State CEQA Guidelines (Section 15064.4(a)) requirements to make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate a proposed project's GHG emissions. Under the State CEQA Guidelines Section 15064.4(a), LAWA has the discretion to choose the model it considers most appropriate for construction GHG emissions estimates (CalEEMod). Additionally, Section 4.2.1.3.1 in Section 4.1, Air Quality and Human Health Risk, of the Draft EIR, specifies the emission sources that were utilized in the construction emissions analysis.

[1] California Air Pollution Control Officers Association (CAPCOA), California Emissions Estimator Model (CalEEMod) User's Guide, Version 2016.3.1, September 2016.

[2] California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures," August 2010, page 47, Available: https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/capcoa_quantifying_ghg_measures.pdf.

**LAMP-AL00008-52**

**Comment:** The DEIR also fails to account for all of the Project's operation-related emissions. The analysis does not include transportation-related GHG emissions that would be generated during the entire distance that Project-related vehicles travel to and from LAX. Instead, the analysis focuses on trips occurring near LAX (i.e., only within approximately six miles of the airport). DEIR at 4.5-32. The DEIR explains that it focuses on the emissions from trips within this six-mile radius because these are the trips that would be directly affected by the Project's improvements. *Id*. The DEIR's approach is illogical. The Project's impact on vehicular trips has no bearing on the Project's potential to increase GHG emissions. Vehicles would emit GHG emissions during the entire trip to and from LAX, not just within a six-mile radius of the airport. Indeed, the DEIR recognizes this fact when it discusses the GHG inventory that LAWA estimated for each of its airports, including LAX. The inventory of 1990 GHG transportation-related emissions for LAX "assumed the full distance of vehicle trips to and from the Airport." *Id*. Because LAX attracts travelers from through the southern California region, the vast majority of those travelers would be expected to travel a distance far greater than six miles.

**Response:** The commentor claims that the Project's impact on vehicular trips has no bearing on the Project's potential to increase GHG emissions, and that the Draft EIR analysis underestimates Project-related GHG emissions. These assertions are incorrect for the following reasons:

- The commentor's basic claim that "the Project's impact on vehicular trips has no bearing on the Project's potential to increase GHG emissions" appears to be tied to the commentor's unfounded assertion that implementation of the proposed Project would enable LAX to accommodate at least 95 million annual passengers. Please see Response to Comment LAMP-AL00008-2 for the many reasons why that assertion is incorrect.
- The LAX Landside Access Modernization Program would reduce Airport-related trips when compared to the number of trips that would occur under baseline conditions without the Project. This can be seen in the comparison of With Project to Without Project daily parking volumes for 2015, 2024, and 2035 shown in the Draft EIR, Appendix F, Attachment F.4 (starting on page 571 of the Appendix F PDF). The With Project parking volume in 2015 would be 1,619 less than the Without Project (baseline) parking volume in 2015, as shown on page 575 of the Appendix F PDF. The With Project parking volume in 2024 would be 2,054 less than the Without Project (baseline) parking volume in 2024, as shown on page

647 of the Appendix F PDF. The With Project parking volume in 2035 would be 1,144 less than the Without Project (baseline) parking volume in 2035, as shown on page 706 of the Appendix F PDF.

- By limiting the GHG emissions analysis to only those roadways within approximately six miles of LAX, the change in GHG emissions between the With and Without Project (baseline) scenarios has been conservatively estimated in the Draft EIR. Vehicle-related GHG emissions are primarily a function of the number of vehicle trips multiplied by the length of each trip, which is expressed in terms of vehicle miles traveled (VMT). For example, 100 vehicle trips each having a length of five miles would have a VMT of 500. The analysis of vehicle-related GHG impacts associated with the proposed Project accounted for the number of existing vehicle trips that would be eliminated by virtue of the transportation/transit improvements resulting from Project implementation, and did so in terms of changes in VMT assuming an average trip length of approximately six miles as would occur in the immediate vicinity of the Airport. If one were to instead assume the entire length of each of those eliminated trips, which may be approximately 20 to 30 miles or more to or from the Airport, the *reduction in VMT* and associated GHG emissions would be 3 to 5 times greater than what was otherwise estimated in the Draft EIR with the assumption of a six-mile trip length.
- The indication on page 4.5-32 of the Draft EIR that the 1990 LAX GHG inventory assumed the full distance of vehicle trips to and from the Airport simply notes the assumption used for that particular purpose and is followed immediately by explanation of why the analysis of the LAX Landside Access Modernization Program focuses on the six-mile radius around LAX, as that is the area where Project-related impacts to vehicular trips were assumed most likely to occur.

**LAMP-AL00008-53**

**Comment:** Finally, the DEIR underestimates the Project's increase in GHGs because it underestimates the increase in traffic that would accompany the proposed Project. As discussed above, the DEIR fails to account for all of the Project's vehicular trips because it does not take into account induced travel. An accurate inventory of all of the Project's transportation-related emissions is critical because the transportation sector is one of the largest sources of U.S. GHG emissions. In 2014, transportation represented approximately 26 percent of total U.S. GHG emissions. Between 1990 and 2014, GHG emissions in the transportation sector increased more in absolute terms than any other sector (i.e., electricity generation, industry, agriculture, residential, or commercial).[9]

[9] U.S. EPA Transportation and Climate Website, attached hereto as Exhibit X, *available at* https://www.epa.gov/air-pollution-transportation/carbon-pollution-transportation (last visited November 15, 2016).

**Response:** The traffic model used to calculate VMT accounted for growth in population, housing, employment, and passengers for both 2024 and 2035, including any induced travel. Therefore, it did not underestimate the proposed Project's GHG emissions by failing to account for such induced travel. Please see Responses to Comments LAMP-AL00008--27 and LAMP-AL00008-31.

**LAMP-AL00008-54**

**Comment:** To accurately evaluate the Project's effect on climate change, the EIR must be revised to include indirect construction-related GHG emissions, transportation-related emissions from vehicles traveling the full distance to and from LAX, and emissions from the Project's induced travel. This revised analysis must be transparent in its identification of the Project's GHG emissions. Thus, for

the Project's construction-related emissions, the EIR must identify the amount of indirect emissions that would be generated by each source, i.e., purchased electricity, solid waste disposal, water usage and wastewater disposal. For the DEIR's accounting of transportation-related GHG emissions, the DEIR must identify the average trip distance (miles per trip) for arriving and departing airport travelers, the number of forecasted Project-related vehicular trips, and the amount of GHG emissions per vehicle mile for each of those trips. The DEIR must also clearly identify the number of vehicular trips the Project would induce, and include the emissions from these trips in the GHG analysis. Without an accurate accounting of all of the Project's GHG emissions, the DEIR's analysis is incomplete, making formulation of appropriate mitigation impossible.

**Response:** The comment is a summary of the preceding comments; specifically, comments LAMP-AL00008-51 through LAMP-AL00008-53. Please see Responses to Comments LAMP-AL00008-51 through LAMP-AL00008-53 above. These responses demonstrate that the Draft EIR does accurately account for the proposed Project's GHG emissions.

**LAMP-AL00008-55**

Comment: 2. The DEIR Relies on an Improper Methodology in Its Analysis of the "2015 With Project" Scenario.

The DEIR compares the Project's increase in GHG emissions in 2015 with 2015 existing conditions, as if the Project had, hypothetically, been completed in 2015. DEIR at 4.5-27. This analysis includes various emission sources, including autos and trucks. *Id*. Unfortunately, the DEIR relies on faulty methodology when it quantifies the Project's auto and truck-related GHG emissions and, consequently, it appears the DEIR does not accurately identify the Project's transportation-related GHG emissions.

As Table 4.5-5 shows, the DEIR's identification of the Project's GHG emissions from autos and trucks is based on *total traffic volumes on the roadway network*, rather than just LAX-related trip volumes. DEIR at Table 4.5-5, fn. 1. The DEIR states that the authors had to rely on total traffic volumes on the roadway network because "airport- related trip volumes for this scenario were not available."[10] *Id*. This methodological error masks the Project's impacts and is particularly problematic because the document asserts that vehicular GHG emissions would *decline* as a result of the Project. *Id*. (emphasis added). Because the DEIR does not isolate Project GHG emissions from background emissions, the DEIR lacks the required evidentiary basis for this conclusion. The revised EIR must identify the Project's transportation-related GHG emissions, together with other Project-related emission sources, and evaluate the effect that these emissions would have on climate change reduction goals.

[10] The DEIR does not explain why airport-related trip volumes could not be obtained. Indeed, Table 4.5-7 (2024 Future With Project Compared to 2015 Existing Conditions) and Table 4.5.-9 (2035 Future With Project Compared to 2015 Existing Conditions) contain 2015 baseline data appears to identify Project-related auto and truck GHG baseline emissions. The DEIR should explain why the 2015 Baseline data for autos and trucks in Table 4.5-5 is substantially different than the 2015 baseline in Table 4.5-7 and Table 4.5-9. *See* DEIR at 4.5-27—31.

**Response:** The 2015 analysis of Project-related vehicular greenhouse gas (GHG) emissions was conducted correctly in Section 4.5 of the Draft EIR, and accurately estimated both the number of Airport trips and the proposed Project's GHG impacts. The analysis accurately predicted a reduction in Project-related vehicular GHG emissions due to reductions in VMT. Both the 2015 Existing

Conditions and the 2015 With Project scenarios included background traffic trips and associated GHG emissions. Taking the difference between the two scenarios leaves one with the LAX Landside Access Modernization Program Project incremental GHG emissions. The calculation of the difference between the two scenarios can be viewed in equation format as:

**[**2015 With Project Airport Trips + 2015 Background Trips**] – [**2015 Existing Airport Trips + 2015 Background Trips**]** = [2015 With Project Airport Trips] – [2015 Existing Airport Trips]

The 2015 Background Trips cancel out, and the remaining terms in the equation, the difference between With Project Airport Trips and Existing Airport Trips, is the definition of the proposed Project impact on trips, and therefore on vehicular GHG emissions. It is this difference that is included in Table 4.5-5 (page 4.5-27) of the Draft EIR.

**LAMP-AL00008-56**

**Comment: 3. The DEIR Errs By Not Determining Whether the Emissions in 2024 and 2035 Are Significant Project-Related Impacts.**

CEQA requires that an EIR must analyze not only a project's direct effects, but also indirect effects that are reasonably foreseeable. CEQA Guidelines §§ 21065 and § 15064(d). Here, it is reasonably foreseeable that the Project will cause increased passenger activity and aircraft operations. This, in turn, will cause GHG emissions to increase substantially. Although the DEIR quantifies the GHG emissions that would be expected to occur in 2024 and 2035, it refuses to attribute these emissions to the Project. The EIR's failure to analyze these indirect impacts of the Project is prejudicial error. *See Plastic Pipe & Fittings Assn. v. California Building Standards Com*. (2004) 124 Cal.App.4th 1390, 1412 (CEQA requires analysis of indirect impacts).

The DEIR relies on the faulty assumption that any changes in emissions from aircraft operations over the 2015 existing conditions are due to increased travel demand and changes in aircraft fleet mixes that are projected to occur by 2024 and 2035, irrespective of the proposed Project. DEIR at 4.5-7. This assertion is illogical. As this letter and the attached Kanafani Report make clear, the extreme levels of traffic congestion that occur on an on-going basis currently act as a constraint on the airport. Once these landside access constraints are removed, passenger activity and associated aircraft operations would be expected to substantially increase. In fact, LAWA is projecting substantial growth in passenger activity: from 74.9 MAP in 2015 to 85 MAP by 2024 and 96 MAP by 2035. DEIR at 4-5.

The need for a thorough analysis of the Project's indirect effects is not academic. The current maximum operational capacity for LAX is 78.9 MAP, as set forth in the airport's long range planning documents, including but not limited to the 2004 LAX Master Plan, the 2005 LAX Specific Plan, and the 2013 Specific Plan Amendment Study. Because there has been no analysis of the environmental impacts of operational capacity beyond 78.9 MAP, the DEIR is obligated to analyze the increase in GHG emissions that would accompany these increased activity levels. The DEIR cannot simply ignore the increase in GHG emissions associated with this growth, and especially the emissions from aircraft.

Aircraft constitute a huge portion of an airport's emissions. According to a report prepared by the Center for Biological Diversity ("CBD"), aircraft carbon polluting is skyrocketing. *See* Up In the Air—How Airplane Carbon Pollution Jeopardizes Global Climate Goals, CBD, December 2015, attached hereto as Exhibit Y. If commercial aviation were considered a country, it would rank seventh after Germany in terms of carbon emissions. *Id*. at 3. CBD found that:

> [B]y 2050, aircraft emissions re projected to more than triple. Unchecked, between 2016 and 2050 global aviation will generate an estimated 43 gigatonnes of carbon dioxide emissions. That amounts to more than 4 percent of the world's entire remaining carbon budget—the amount of pollution that can still be emitted before catastrophic planetary warming become virtually certain.
>
> *Id*. at 2.

**Response:** Please see Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-7, and LAMP-AL00008-8. As demonstrated by these responses, the proposed LAX Landside Access Modernization Program Project would not affect or change any airfield components, including the runways, taxiways, or aircraft arrival and departure procedures, and thus would not increase the overall capacity of LAX. The proposed LAX Landside Access Modernization Program Project would not result in any increases in passenger activity or aircraft operations that would indirectly increase GHG emissions.

**LAMP-AL00008-57**

**Comment:** The DEIR does quantify the increases in GHG emissions in 2024 and 2035 and compares these emissions to 2015 (existing conditions) emissions' levels. The analysis of "2024 Future With Project" to 2015 existing conditions, in particular, identifies a substantial increase in GHG emissions attributable to the Project. *See* DEIR Table 4.5-7, p. 4.5-29. The problem, however, is that the DEIR includes this analysis for "informational purposes only" (*id.* at 4.5-28); it does not undertake this analysis for purposes of determining whether the Project would cause these significant impacts. Consequently, although the Project would result in a significant increase in GHG emissions in 2024, as compared to existing conditions, the DEIR fails to put forth any mitigation measures. This is in direct violation of CEQA as the primary goal of an EIR is to identify a project's significant environmental impacts and find ways to avoid or minimize them through the adoption of mitigation measures or project alternatives. §§ 21002.1(a), 21061.

**Response:** As indicated in Section 4.5.4.1.1 on page 4.5-24 of the Draft EIR, the evaluation of Project emissions for the analysis scenarios of 2024 Future With Project compared to 2015 existing conditions and 2035 Future With Project compared to 2015 existing conditions were compared to the GHG thresholds for informational purposes; however, the level of significance of Project-related emissions was not determined for those scenarios because the future conditions (2024 and 2035) include emissions not attributable to the proposed Project. Specifically, 2024 and 2035 include future emissions from future growth in regional and local traffic that would occur irrespective of the proposed Project. As such, it would be incorrect, uninformative and misleading to use 2015 existing conditions as a baseline for drawing significance conclusions for the Future With Project scenarios. Rather, the correct, accurate, and meaningful determinations of impact significance are made by comparing 2024 Future With Project to 2024 Future Without Project and 2035 Future With Project to 2035 Future Without Project. Using the Future Without Project scenarios as a baseline controls for future non-Project emissions and isolates the changes in future emissions that are attributable to the proposed Project. The Future Without Project scenarios properly serve as a baseline because they accurately represent the "existing environmental conditions" upon which the project will operate. (See *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439,453.) Please also see Response to Comment LAMP-AL00006-1 for a parallel discussion of the Draft EIR's choice of baseline scenarios for the air quality impact analysis.

**LAMP-AL00008-58**

**Comment:** **4. The DEIR's Analysis of 2024 and 2035 Conditions Underestimate the Project's GHG Impacts.**

The DEIR's analysis of the "2035 Future With Project" compared to the "2035 No Project" is flawed because it fails to properly analyze the Project's time horizon. The DEIR explains that the lifetime of the Project is 30 years. DEIR at 4.5-6; 4.5-24. By analyzing impacts only through 2035, the DEIR fails to provide the public with a meaningful assessment of the Project's full impact on climate change. The document should have analyzed impacts through at least 2047 (i.e., 30 years past the date that construction would commence which is estimated to be the end of 2017). *Id*. at 2-175. By not including 12 years of emissions, the DEIR substantially underestimates the Project's GHG emissions and the Project's contribution to climate change.

**Response:** The Draft EIR reference to a 30-year project life pertains to the methodology used for amortizing construction-related emissions only. As indicated in Section 4.5.2.1 of the Draft EIR, GHG emissions from construction were amortized over a 30-year lifetime in accordance with SCAQMD guidance,[1] which is a standard analysis assumption for any project and is not particular to the proposed LAX Landside Access Modernization Program Project.

A lead agency has discretion to select the appropriate metrics and time horizons for measuring a particular proposed project's operational emissions. (See State CEQA Guidelines Section 15064.4(a).) The Draft EIR analysis properly uses Project-related annual GHG emissions in 2024 and in 2035 as a metric for operational emissions. There is no evidence that the proposed Project's annual GHG emissions would increase after buildout in 2035; hence, to evaluate the Project's GHG emissions out to 2047, beyond Project buildout, would serve no purpose.

Further, by stating that the Draft EIR excludes "12 years of emissions," the comment implies that total GHG emissions rather than annual GHG emissions should have been used as a metric to measure proposed Project impacts. This metric would not have allowed efficient application of the Draft EIR's selected impact significance thresholds, and is not typically used in CEQA GHG impact evaluations.

[1] South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, p. 3-9.

**LAMP-AL00008-59**

**Comment:** **C. The DEIR Fails to Adequately Analyze the Project's Consistency with AB 32.**

The Supreme Court has weighed in on appropriate thresholds for GHG emissions. In *Center for Biological Diversity v. California Department of Fish and Wildlife*, the Court affirmed reliance on compliance with AB 32's reduction goals as a valid threshold of significance when used as a "comparative tool for evaluating efficiency and conservation efforts." *Center for Biological Diversity*, 62 Cal.4th 204, 225-28. While the DEIR appropriately acknowledges AB 32, it fails to actually analyze the Project's consistency with this law because it claims it is technically unable to do so. The GHG reduction target reflected in AB 32 calls for a statewide reduction in GHG emissions to 1990 levels by 2020. The DEIR asserts that while LAWA has estimated 1990 GHG emissions for each of its airports, including LAX, and that LAX's 1990 GHG inventory assumes GHG vehicular emissions from the full distance of vehicle trips to and from LAX, the DEIR includes only those emissions from vehicles traveling within approximately six miles of the airport.[11] DEIR at 4.5-32. The DEIR then explains that, given the differences in key assumptions, a comparison of the Project-related GHG emissions estimated for 2024 and 2035 to the emissions in the 1990 LAX GHG inventory would not provide an appropriate basis for evaluating

how the GHG emissions of the Project measure against the GHG reduction targets of AB 32. *Id*. As discussed above, the DEIR errs by not including GHG emissions from the entire trip distance that Project- related vehicles would travel to and from LAX. Once LAWA conducts the analysis in an accurate manner, it will be able to properly assess the Project's consistency with AB 32.

[11] The DEIR asserts that this is the appropriate study area because it is the trips occurring within this six-mile distance that would be "directly affected by the Proposed Project improvements." DEIR at 4.5-32.

**Response:** Although the *Center for Biological Diversity* case provides that a lead agency may use AB 32's goals as an impact significance threshold, this is not a requirement. Lead agencies have discretion to select GHG significance thresholds applicable to a proposed project, and the thresholds used in the Draft EIR were appropriately tailored to the unique characteristics of the proposed Project.

Please see Response to Comment LAMP-AL00008-52 regarding the reasons why the GHG mobile source emissions estimates in the Draft EIR focus on vehicle trips in the vicinity of LAX, and do not assume entire trip lengths. As indicated in that response, by assuming increased trip lengths, which may be 20 to 30 miles or more from the Airport, the ***reduction*** in GHG emissions from autos and parking when comparing the With Project and Without Project scenarios could be proportionately as much as a 3 to 5 times greater reduction than indicated in the Draft EIR.

Lastly, although the Draft EIR discusses the technical challenges involved in assessing the proposed Project's consistency with AB 32, it does not find that the Draft EIR is "unable" to perform this analysis. Notwithstanding these technical challenges, the commentor fails to recognize that the Draft EIR ultimately did analyze the proposed Project's consistency with AB 32. It concluded (p. 4.5-33) that the proposed Project would be inconsistent with the State's ability to achieve the AB 32 2020 target, and that this is a significant impact. See also Response to Comment LAMP-AL00008-60.

**LAMP-AL00008-60**

**Comment:** Notwithstanding the DEIR's assertion that it is unable to analyze the Project's consistency with AB 32, the document patches together an analysis and asserts that Project-related emissions in 2024 would be approximately 43 percent greater than 1990 emissions and the Project-related emissions in 2035 would be approximately 48 percent greater than the 1990 GHG emissions.[12] DEIR at 4.5-33. The DEIR determines that the Project would be inconsistent with the GHG reduction target set forth in AB 32 and that this constitutes a significant impact. *Id.* We agree with this inconsistency conclusion.

The DEIR, however, fails to evaluate the Project's emission projections against the emission reduction targets established by AB 32. It is not sufficient to simply state that in 2024, the Project's emissions would be more than 43 percent greater than the 1990 emission levels. The EIR should have disclosed what LAX's 1990 GHG emissions were and then used this figure as the starting point to determine if the LAMP Project does its fair share to comply with AB 32's GHG reduction goals. Then, the EIR should have identified what the Project's emissions would be expected to be in 2020. Because the DEIR does not disclose this information anywhere, it fails to satisfy CEQA's most basic informational purpose. *See* Pub. Res. Code § 21061 ("The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect that a proposed project is likely to have on the environment.").

[12] The DEIR does not clearly explain how it arrived at its GHG emission exceedance figures other than stating that emissions were based on MAP levels and EMFAC emission factors. The revised EIR should be transparent in its analyses so that the public and decisionmakers are able to follow each step in the EIR's methodological process.

**Response:** A lead agency has broad discretion to select appropriate technical methods for analyzing GHG emissions. (See State CEQA Guidelines Section 15064.4(a).) The GHG analysis in the Draft EIR properly focuses on the emissions and impacts associated with the proposed Project, and compares the Project-related GHG emissions to the similar type emissions estimated to occur in 1990. If the Project-related GHG emissions were compared against LAX's overall GHG emissions estimated for 1990, the incremental change in GHG emissions that are attributable to the proposed Project would be substantially less than reported in the Draft EIR, which would be misleading and not representative of the Project's impacts. The impact analysis evaluated the Project's GHG emissions in 2024 and 2035, as those represent major milestones when the LAX Landside Access Modernization Program Project improvements and Potential Future Related Development improvements are projected to be completed and in operation. As indicated in Table 2-15, Construction Phasing, on page 2-179 of the Draft EIR, very little of the proposed Project would be completed by 2020; if that date were used as the basis for comparing the Project's GHG emissions to baseline GHG emissions in 1990, the incremental impact would be much less than indicated in the Draft EIR wherein the more meaningful and representative milestone years (2024 and 2035) for Project-related GHG emissions are used. To do what the commentor is requesting, both in terms of inflating the 1990 GHG baseline and looking at only the small increment of the Project that would be completed by 2020, would underestimate and underrepresent the GHG emissions impact of the proposed Project.

Finally, the "fair share" analysis recommended by the commentor shares the same flaws as the "business as usual" approach to determining GHG impact significance that the Supreme Court rejected in the *Center for Biological Diversity* case. The AB 32 Scoping Plan does not provide direction for calculation of the proposed Project's "fair share" of AB 32's statewide emissions reductions. Nothing in the Scoping Plan relates the statewide reduction effort to "the percentage of reduction that would or should be required from individual projects." (*Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 205, 225-226.)

See also Response to Comment LAMP-AL00008-62 for additional explanation regarding how the GHG emission exceedance figures were calculated.

**LAMP-AL00008-61**

**Comment:** **D. The DEIR Fails to Adequately Analyze the Project's Consistency with**

**Executive Orders S-3-05 and B-30-15.**

In addition to properly analyzing consistency with the reduction goals set forth under AB 32, the DEIR must analyze the Project's consistency with state climate policy as set forth in Executive Orders S-3-05 and B-30-15. Executive Order S-3-05 establishes a long-term goal of reducing California's emissions to 80 percent below 1990 levels by 2050. Executive Order B-30-15 sets an interim target of 40 percent below 1990 levels by the year 2030.

The DEIR acknowledges Executive Orders S-3-05 and B-30-15, yet it does not analyze the Project's consistency with either directive in any meaningful way. In fact, it contains even less "analysis" than that provided for its discussion of AB 32. The DEIR simply refers to its discussion of AB 32, and states that since the GHG emissions associated with operations of the Project in

2024 and 2035 would not be less than the levels estimated for 1990 conditions, the Project's emissions would exceed the GHG reduction targets in Executive Orders S-3-05 and B-30-15. DEIR at 4.5-33, 34. It goes on to explain that the Project would be inconsistent with these directives; and that these inconsistencies constitute significant impacts. *Id*. As discussed above, these bare, unsupported assertions are not the careful evaluation of potential impacts that CEQA requires.

The DEIR's treatment of these directives is particularly disappointing because the Court of Appeal has recognized that Executive Order S-3-05, designed to meet the environmental objective of climate stabilization, is highly relevant under CEQA. *Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1157 (quoting the California Attorney General).

Other agencies have adopted the Executive Orders as thresholds of significance for long-term projects, including Regional Transportation Plans. For example, in 2015 the San Diego Association of Governments ("SANDAG") used them as a threshold of significance in the EIR for its most recent RTP/SCS. Specifically, Impact GHG-4 of that EIR asked whether the project would "[b]e inconsistent with the State's ability to achieve the Executive Order B-30-15 and S-3-05 goals of reducing California's GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050." *See* SANDAG 2015 RTP/SCS EIR at 4.8-33, attached as Exhibit Z; *see also Cleveland National Forest Foundation v. SANDAG* (November 24, 2014) 231 Cal.App.4th 1056 (Review Granted, 343 P.3d 903).

The SANDAG RTP/SCS EIR evaluated that project's impacts by calculating a 40 percent and 80 percent reduction from the region's 1990 emissions and using those figures as a target reference point for the RTP. It then compared the region's expected GHG emissions in the years 2035 and 2050 to the emissions necessary to meet the Executive Orders' trajectories. It included charts showing that the Plan would not come close to meeting the Executive Orders' goals. It concluded: "Because the total emissions in the San Diego region of 25.5 MMT CO2e in 2035 would exceed the regional 2035 GHG reduction reference point of 14.5 MMT CO2e (which is based on Executive Order- B-30-15 and Executive Order S-3-05), the proposed Plan's 2035 GHG emissions would be inconsistent with state's ability to achieve the Executive Orders' GHG reduction goals. Therefore, this impact (GHG-4) in the year 2035 is significant." SANDAG 2015 RTP/SCS EIR at 4.8-35. It reached a similar conclusion for the year 2050 goal.

The LAMP DEIR's failure to compare the Project's emissions against the long-term GHG emission reduction policies set forth in Executive Orders S-3-05 and B-30-15 is unlawful, and SANDAG's recent example demonstrates that there is no excuse for the omission. LAWA has access to the state's GHG reduction goals, which reflect the emissions decreases that climate scientists have concluded are needed to provide a 50 percent chance of limiting global average temperature rise to 2° C above pre-industrial levels. The revised EIR should reveal the nature and extent of the Plan's sharp inconsistency with these clear goals.

**Response:** Contrary to the commentor's assertion, the Draft EIR on pages 4.5-33 and 4.5-34 does analyze the proposed Project's consistency with the Executive Orders, and treats consistency with the State's ability to achieve the Executive Order targets as significance thresholds. There is no "omission" related to the Executive Orders in the Draft EIR. Each lead agency has broad discretion to select appropriate technical methods for analyzing GHG emissions, including analyzing consistency with plans and policies such as the Executive Orders. (See State CEQA Guidelines Section 15064.4(a).) As discussed below, the Draft EIR's approach to this analysis was reasonable, and the commentor's suggested approach is not appropriate for the proposed Project.

The basic nature of the SANDAG 2015 RTP/SCS project and associated GHG emissions characteristics are substantially different from those of the proposed LAX Landside Access Modernization Program Project. The SANDAG 2015 RTP/SCS provides a countywide regional plan that comprehensively addresses growth, transportation, land use and development patterns, and sustainability strategies anticipated to occur through 2035 and ultimately 2050. The LAX Landside Access Modernization Program Project is a specific development project particular to LAX with initial completion in 2024 and buildout, including future potential development, in 2035. The specific "reference point" approach to determining Executive Order consistency used in the SANDAG EIR may be appropriate for a long-term comprehensive regional plan with many sources of GHG emissions (being more similar to a statewide emissions inventory), but it clearly is not appropriate for a shorter-term specific project with only a few sources of GHG emissions.

Additionally, it is important to note that the implementation aspects of Executive Orders B-30-15 and S-3-05 are specific to, and limited to, state agencies and not individual development projects such as the LAX Landside Access Modernization Program. The Executive Orders instruct those state agencies to develop plans, strategies, and measures to reduce GHG emissions statewide, but those instructions do not provide any specifics on how the State is supposed to achieve those reductions. As with the AB 32 Scoping Plan, nothing in the Executive Orders relates the statewide reduction efforts to "the percentage of reduction that would or should be required from individual projects." (See *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 205, 225-226.)

As such, it is not meaningful to provide an analysis of how the proposed Project's GHG emissions compare to speculative, hypothetical "fair share" project-specific emission reductions under the Executive Orders. It is more meaningful to analyze, as in the Draft EIR, whether the GHG emissions associated with the Project would or would not, be consistent with the State's ability to achieve the Executive Order GHG reduction targets. Section 4.5 of the Draft EIR provides estimates of the Project's GHG construction and operations emissions and describes (on pages 4.5-34 and 4.5-35) why those GHG emissions would not be consistent with the State's ability to achieve the Executive Order GHG reduction targets; therefore the Draft EIR considers these GHG impacts to be significant.

**LAMP-AL00008-62**

**Comment:** **E. The DEIR Fails to Adequately Analyze the Project's Consistency with the LAWA Sustainability Plan.**

The LAWA Sustainability Plan sets goals and actions that LAWA will undertake to implement the initiatives set forth in the Green LA Plan. The Green LA Plan calls for the City to reduce GHG emissions by 35 percent below 1990 levels by 2030. DEIR at 4.5-34. The DEIR explains that the Project would not be consistent with the target GHG reduction level identified in the Green LA Plan and thus would be inconsistent with the LAWA Sustainability Plan. *Id*. Yet, here too, the DEIR does not bother to provide *any* explanation as to how far off course the Project would set LAX from achieving the goals established in its own Sustainability Plan. The DEIR cannot simply identify an impact; it must disclose the severity and extent of this impact. *See, e.g., Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs*. (2001) 91 Cal.App.4th 1344, 1370-71; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1123; *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831 (a lead agency may not simply jump to the conclusion that impacts would be significant without disclosing to the public and decisionmakers information about how adverse the impacts would be).

**Response:** As indicated in Section 4.5.5.1.3, specifically in the top paragraph on page 4.5-33, of the Draft EIR, *"…the Project-related GHG emissions in 2024 would be approximately 43 percent greater*

*than the comparable emissions in 1990 and the Project-related GHG emissions in 2035 would be approximately 48 percent greater than the 1990 GHG emissions.*" The Draft EIR's discussion of consistency of the Green LA Plan on page 4.5-34 references this section. As such, the proposed Project's GHG emissions in 2024 would already be 78 percent above the Sustainability Plan's 2030 GHG reduction target of 35 percent below 1990 levels, and the proposed Project's GHG emissions in 2035 would be 83 percent above the 2030 GHG reduction target. Relative to the proposed Project's GHG emissions in 2030, as the basis of a direct comparison to the 2030 GHG reduction target, the percent above 1990 GHG emissions levels that would occur within the 11 years between 2024 and 2035 would average approximately 0.45 percent per year (i.e., the 48 percent exceedance projected for 2035 minus the 43 percent projected for 2024 equals a difference of 5 percent, which divided by the 11 years between 2024 and 2035 equals 0.45 percent per year), which multiplied by six years between 2024 and 2030, would equate to 2.7 percent. As such, the proposed Project's GHG emissions in 2030 would be approximately 45.7 percent above the 1990 GHG emissions (i.e., 43 percent in 2024 + 2.7 percent over six additional years to 2030), which is 80.7 percent above the 2030 GHG reduction target.

While the Draft EIR provides the basic information to provide the quantitative comparison to the GHG reduction goals identified in the LAWA Sustainability Plan and the Green LA Plan, the following additions are hereby made to the text on pages 4.5-34 and 4.5-35 of the Draft EIR, as reflected in Chapter 3, Corrections and Additions to the Draft EIR for further clarification. These revisions do not change the Draft EIR's conclusion that the proposed Project's numerical exceedances of the GHG reduction target reflected in Green LA is considered, for the purposes of this EIR, to be inconsistent with the City's ability to achieve the 2030 target in the subject plan and is therefore a significant impact.

[page 4.5-34, paragraph under the heading Green LA]

As described in Section 4.5.3.1.4, Green LA presents a framework targeted to reduce the City's GHG emissions by 35 percent below 1990 levels by 2030, and identifies objectives and actions in various focus areas, including airports. While none of those objectives and actions are specific to the proposed Project, the essence of the proposed Project, to reduce traffic congestion around the airport, reduce VMT, and reduce GHG emissions, is consistent with, and complementary to, the basic purpose of the Green LA plan. Notwithstanding, the GHG emissions associated with operations of the proposed Project in the future would exceed the City's climate change goal reflected in Green LA; that goal being to reduce the city's GHG emissions 35 percent below 1990 levels by 2030 – see discussion above relative to AB 32 for additional explanation. *More specifically, as indicated in the top paragraph on page 4.5-33, of the Draft EIR, "…the Project-related GHG emissions in 2024 would be approximately 43 percent greater than the comparable emissions in 1990 and the Project-related GHG emissions in 2035 would be approximately 48 percent greater than the 1990 GHG emissions." As such, the Project's GHG emissions in 2024 would already be 78 percent above the 2030 GHG reduction target of 35 percent below 1990 levels, and the Project's GHG emissions in 2035 would be 83 percent above the 2030 GHG reduction target. Relative to the Project's GHG emissions in 2030, as the basis of a direct comparison to the 2030 GHG reduction target, the percent above 1990 GHG emissions levels that would occur within the 11 years between 2024 and 2035 would average approximately 0.45 percent per year (i.e., the 48 percent exceedance projected for 2035 minus the 43 percent projected for 2024 equals a difference of 5 percent, which divided by the 11 years between 2024 and 2035 equals 0.45 percent per year), which multiplied by six years between 2024 and 2030, would equate to 2.7 percent. As such, the Project's GHG emissions in 2030 would be approximately 45.7 percent above the 1990 GHG emissions (i.e., 43 percent in 2024 + 2.7 percent over six additional years to 2030), which is 80.7 percent above the 2030 GHG reduction target*. The proposed Project's numerical exceedances of the GHG reduction target reflected in

Green LA is considered, for the purposes of this EIR, to be inconsistent with the City's ability to achieve the 2030 target in the subject plan and is therefore a significant impact.

[page 4.5-35, second paragraph under the heading LAWA Sustainability Plan]

In summary, implementation of the proposed Project would not conflict with the overall intent of the LAWA Sustainability Plan; however, the GHG emission level associated with future operation (2024 and 2035) of the proposed Project do not conform to Objective Target 5A (i.e., reduce GHG emissions to 35 percent below 1990 levels by 2030). *More specifically, as indicated in the top paragraph on page 4.5-33, of the Draft EIR, "…the Project-related GHG emissions in 2024 would be approximately 43 percent greater than the comparable emissions in 1990 and the Project-related GHG emissions in 2035 would be approximately 48 percent greater than the 1990 GHG emissions." As such, the Project's GHG emissions in 2024 would already be 78 percent above the 2030 GHG reduction target of 35 percent below 1990 levels, and the Project's GHG emissions in 2035 would be 83 percent above the 2030 GHG reduction target. Relative to the Project's GHG emissions in 2030, as the basis of a direct comparison to the 2030 GHG reduction target, the percent above 1990 GHG emissions levels that would occur within the 11 years between 2024 and 2035 would average approximately 0.45 percent per year (i.e., the 48 percent exceedance projected for 2035 minus the 43 percent projected for 2024 equals a difference of 5 percent, which divided by the 11 years between 2024 and 2035 equals 0.45 percent per year), which multiplied by six years between 2024 and 2030, would equate to 2.7 percent. As such, the Project's GHG emissions in 2030 would be approximately 45.7 percent above the 1990 GHG emissions (i.e., 43 percent in 2024 + 2.7 percent over six additional years to 2030), which is 80.7 percent above the 2030 GHG reduction target*. Notwithstanding that such future GHG emissions levels are due to future passenger activity levels at LAX that are beyond the scope of the proposed Project and that such future GHG emissions would be greater without implementation of the proposed Project, the numerical inconsistency with the target GHG reduction level is considered, for the purposes of this EIR, to be inconsistent with LAWA's ability to achieve the 2030 target in the subject plan and is therefore a significant impact.

**LAMP-AL00008-63**

Comment: F. The DEIR Lacks the Evidentiary Support that Its Mitigation Measures Would Effectively Reduce Project-Related GHG Emissions to Less-Than-Significant Levels.

Notwithstanding the flaws in the analysis of the Project's GHG impacts, the DEIR concludes that the Project's increase in GHG emissions would be significant. The DEIR includes two measures intended to reduce the Project's significant GHG impacts.[13] One measure would incorporate solar energy into the LAMP facilities, while the second measure would require the use of renewable diesel fuel in off-road equipment and on-site trucks, *to the extent feasible*. *Id*. at 4.5-59. The DEIR concludes that these two measures would reduce the Project's construction and operational impacts to less-than-significant levels for all impact scenarios. *Id*. 4.5-59—65; 70. The document does not, however, base its conclusions on substantial evidence. To conclude as the DEIR does, that an impact is less than significant, substantial evidence must demonstrate that mitigation measures will reduce an impact to a less-than-significant level. Substantial evidence consists of "facts, a reasonable presumption predicated upon fact, or expert opinion supported by fact," not "argument, speculation, unsubstantiated opinion or narrative." Pub. Res. Code § 21080(e)(1)-(2). Because the DEIR's conclusion of insignificance is premised on unsupported assumptions, it falls far short of this threshold.

[13] The DEIR also proposes an array of mitigation measures, most of which are intended to mitigate the Project's air quality impacts. DEIR at 4.5-43—58. However, the DEIR explains that because LAWA is unable to quantify the

effectiveness of these measures, the document makes no estimate of the air quality or GHG benefit.

**Response:** The commentor's statement that "[t]he DEIR concludes that these two measures [MM-GHG (LAMP)-1 and MM-AQ (LAMP)-1] would reduce the Project's construction and operational impacts to less-than-significant levels for all impact scenarios." is incorrect and does not reflect the clearly stated GHG impact conclusions of the Draft EIR. Section 4.5.9, Level of Significance After Mitigation, on page 4.5-71 of the Draft EIR states "GHG emissions associated with the construction and operation of the proposed [LAX Landside Access Modernization Program] Project would result in an unavoidable significant impact. Similarly, construction and operation of potential future related development would result in an unavoidable significant impact. In sum, the impacts of the proposed Project on global climate change would be significant and unavoidable."

Also, please note that Section 4.5.8 of the Draft EIR does present tables and text that constitute substantial evidence quantifying the effectiveness of Mitigation Measures MM-GHG (LAMP)-1 and MM-AQ (LAMP)-1 in reducing the proposed Project's GHG emissions.

**LAMP-AL00008-64**

**Comment:** For example, the DEIR's measure calling for the use of renewable diesel fuel is vague and directory. Uncertain, vague, and speculative mitigation measures have been held inadequate because they lack a commitment to enforcement. *See, e.g.*, *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1188-89 (holding traffic mitigation fee measure inadequate under CEQA due to vagueness in program for implementing required improvements). Here, the measure simply suggests that LAWA would require the use of diesel fuel "to the extent feasible." DEIR at 4.5-59. Without committing to requiring the use of renewable fuel in construction equipment and trucks, the DEIR may not take credit for any GHG emission reductions. Moreover, the DEIR must identify which construction equipment and trucks would use this fuel, and provide sufficient documentation to allow the public and decisionmakers to verify the projected reductions in emissions. Without this documentation, the DEIR has no basis to conclude that the emission reductions from the use of renewable diesel fuel would be sufficient to offset the Project's increase in construction-related GHG emissions.

**Response:** The commentor notes that the greenhouse gas impact analysis of the LAX Landside Access Modernization Program Draft EIR called for the use of renewable diesel fuel without specific commitment to construction requirements. This measure was quantified assuming 90 percent utilization of renewable diesel fuel by the construction fleet, noted in Appendix F, Attachment F.1, Assumptions (PDF page 54), of the Draft EIR. LAWA is committed to and will require at least 90 percent utilization of renewable diesel fuel by the construction fleet as a part of the LAX Landside Access Modernization Program construction specifications. Moreover, alternative diesel fuel that meets the emissions reduction requirements assumed in MM-AQ (LAMP)-1 is readily available in the Los Angeles area, accessible directly from the fuel provider. Additionally, the fuel readily available in the Los Angeles area is specified by the manufacturer as being completely interchangeable and intermixable with conventional diesel in any ratio and fully functional in any diesel engine.[1]

[1] Neste Corporation. Neste Renewable Diesel Handbook. May 2016, Available: https://www.neste.com/sites/default/files/attachments/neste_renewable_diesel_handbook.pdf.

**LAMP-AL00008-65**

**Comment:** The measure calling for the use of solar energy in LAMP facilities is similarly flawed. The DEIR provides no detail as to which LAMP facilities would use solar energy. Nor does it quantify the emission reduction from these facilities. Without this documentation, the DEIR has no basis to conclude that the emission reductions from the use of solar energy would be sufficient to offset the Project's increase in operational GHG emissions.

**Response:** The commentor incorrectly notes that the greenhouse gas impact analysis of the LAX Landside Access Modernization Program Draft EIR called for the implementation of solar energy without specific commitment to solar energy requirements. LAWA has committed to requiring at least 5.70 megawatts in AC output capacity (MWAC) to reduce secondary greenhouse gas emissions associated with Project-related electrical demand, as specified in Mitigation Measure MM-GHG (LAMP)-1 (see page 4.5-61 in Section 4.5, Greenhouse Gas Emissions, of the Draft EIR). Solar energy generation was assumed to be used directly for the LAX Landside Access Modernization Program and was accounted for as a direct reduction in electrical operating demand of the Project. Tables 4.5-19 and 4.5-21 in Section 4.5.8 of the Draft EIR specify the reduction in GHG emissions with implementation of the proposed mitigation measures, including MM-GHG (LAMP)-1, Incorporate Solar Energy into LAX Landside Access Modernization Program Facilities.

**LAMP-AL00008-66**

**Comment:** **G. The DEIR Fails to Analyze and Adopt All Feasible Mitigation.**

The DEIR acknowledges that the Project's inconsistency with the GHG reduction targets established in state, regional and local plans constitutes a significant and unavoidable impact. DEIR at 4.5-70. If the DEIR had identified adequate mitigation measures as required under CEQA, it could have substantially lessened the Project's increase in GHG emissions. LAWA has a duty to consider other feasible mitigation measures as it may not approve the Project with significant environmental impacts if there are feasible mitigation measures which would substantially lessen those effects (even if they are not completely avoided or reduced to a less than significant level). Pub. Res. Code § 21002.

**Response:** The Draft EIR does present a large number of feasible mitigation measures to reduce GHG emissions. Section 4.5.7 of the Draft EIR identifies a broad array of measures to reduce potential air quality impacts, which would also reduce GHG emissions. In addition to specific mitigation measures, Section 4.5.7 presents LAWA Standard Control Measures and LAX Design Guidelines Sustainability Measures which together provide over 100 measures to help reduce potential GHG emissions associated with the proposed Project. With the exception of only four of those measures (i.e., 1e, 1o, and 1p in LAX-AQ-1, as indicated on page 4.5-43, and MM-GHG (LAMP)-1, as indicated on page 4.5-61), the amount of mitigation offered by those measures was not quantified in the Draft EIR, thereby providing a very conservative analysis of mitigation effectiveness.

Please see Responses to Comments LAMP-AL00008-63, LAMP-AL00008-64, and LAMP-AL00008-65 above regarding the quantification of GHG mitigation associated with Mitigation Measures MM-GHG (LAMP)-1 – Incorporate Solar Energy into LAX Landside Access Modernization Program Facilities and MM-AQ (LAMP)-1 – Preferential Use of Renewable Diesel Fuel.

Please see Responses to Comments LAMP-AL00008-67 though LAMP-AL00008-69 below regarding the commentor's suggestions for additional mitigation measures.

**LAMP-AL00008-67**

**Comment:** As an initial matter, LAWA should take all necessary actions to increase transit mode share to the airport. The LAMP is being billed as a project that will create a world-class transportation system connecting LAX to communities and public transportation hubs throughout the Southland. Mayor Garcetti touts the transit benefit of the LAMP as follows: "LAX is our gateway to the world—and by finally bringing rail to the airport, Angelenos and tourists will be able to connect to Los Angeles' world-renowned neighborhoods and attractions without ever stepping foot in a car." *See* Aero Newsletter for the Employees of Los Angeles World Airports.[14] Yet, the reality of the LAMP will not come close to achieving the Mayor's lofty proclamation as the Project is expected to increase transit mode share by only *one* percent! *See* DEIR Tables 4.12.1-1 through 4.12.1-10. It is outrageous that LAWA would spend $5 billion on a transportation project that is expected to result in such a meager increase in transit ridership.

If LAWA were truly committed to increasing transit use to and from LAX, it would have earmarked a large percentage of the Project's $5 billion budget to transit programs and projects. To this end, as mitigation for the Project's significant GHG impacts, LAWA must implement a series of transit-related mitigation measures. LAWA should study the approaches taken at other major airports to increase transit mode share. Leading cities like New York, London, Paris, Frankfurt, Amsterdam, Hong Kong and Shanghai, for example, have all focused on improving "people moving" for some time now, realizing that their airports have become the center of their region's connectivity.[15] Canada's Vancouver Airport is the national leader for increased transit use to and from the airport. At Paris' Charles De Gaulle airport, passengers have the luxury of many different transit options, which has resulted in only 40 percent of travelers arriving by car. *Id*. To mitigate the LAMP's substantial increase in GHG emissions—and to become a true world-class airport—LAWA must study approaches to increasing transit, commit to funding the necessary transit programs and projects, and establish ambitious mode share targets for 2024 and 2035.

[14] *Available at* https://www.lawa.org/uploadedFiles/LAX/pdf/Aero_Newsletter_201602.pdf (last visited November 7, 2016).

[15] *See* Hillary Marshall, "We Must Prioritize Smarter Transit Options to and from Airports," *Huffington Post* (June 27, 2016), attached as Exhibit AA and *available at* http://www.huffingtonpost.ca/hillary-marshall/airport-transit_b_10700664.html (last visited November 7, 2016).

**Response:** The comment presents no evidence that the suggested transit-related mitigation measures are feasible for LAX or would substantially lessen the proposed Project's GHG emission impacts. Further, the comment implies that directly achieving major increases in transit use is a primary objective of the proposed Project. This is incorrect. See pages 1-7 and 1-8 of the Draft EIR for a list of proposed Project objectives. As indicated therein, several of the Project objectives directly and indirectly facilitate the opportunities for increased transit use, including, but not limited to, Objective (a), providing new access options for all modes of travel, including direct connections to transit, and Objective (c) developing a flexible transportation system that provides alternatives to the CTA for passengers, airport and other employees, and airport-related vendors accessing LAX.

As noted in Section 4.12.2.9.1, of Section 4.12, Off-Airport Transportation, LAWA proposes to implement Mitigation Measure MM-ST (LAMP)-6, Transportation Demand Management (TDM) Program, to offer alternative transportation programs and benefits to LAX-area employees in an effort to reduce drive-alone employee trips to and from LAX. LAWA is also closely working with Metro to ensure that the connection between the proposed APM and AMC 96th Street Transit

Station is successfully implemented so that it facilitates use by Airport passengers and employees. Additionally, Section 2.4.6 in Chapter 2, Description of the Proposed Project, identifies a number of measures that LAWA may implement to influence how passengers access the Airport, including potentially implementing tolls to manage traffic during peak periods. As part of the proposed Project demonstrating LAWA's commitment to increasing transit use, LAWA would provide a connection to the Los Angeles County Metropolitan Transportation Authority (Metro) Crenshaw/LAX light rail line at their proposed Airport Metro Connector (AMC) 96th Street Transit Station to be located at Aviation Boulevard and 96th Street. The Draft EIR notes on page 2-5 that Metro is independently working on a connection to the airport along the Metro Crenshaw/LAX light rail line at their proposed AMC 96th Street Transit Station. Metro released a Draft EIR assessing the potential environmental effects of the proposed AMC 96th Street Transit Station in June 2016,[1] released a Final EIR on November 2, 2016,[2] and certified the Final EIR on December 1, 2016.[3]

Tables 4.12.1.8 and 4.12.1.9 of Section 4.12.1, On-Airport Transportation, identify the assumed mode shares for 2024. The existing transit mode share in 2015 was 0.5 percent for both arriving and departing passengers. In 2024, that mode share increases to 1.3 percent, nearly triple the existing mode share. Tables 4.12.1.10 and 4.12.1.11 identify the assumed mode shares for 2035. By 2035, the assumed transit mode share increases to 2 percent, four times as much as under existing conditions.

The proposed AMC 96th Street Transit Station is a separate and independent project from the LAX Landside Access Modernization Program. As such, ridership numbers for the Metro Crenshaw/LAX light rail line were supplied by Metro. It should be noted that LAWA is an agency responsible for maintaining and operating the City's airports; it is not a transit agency and, pursuant to the grant agreements it has entered into in exchange for federal airport grants, it cannot legally fund projects or programs that are geared to transit used by persons other than airport passengers and employees. LAWA can only implement and fund projects that serve only airport passengers and employees. See 49 U.S.C. Sec.47107(b) and 47133; FAA Grant Assurances 24 and 25; FAA Order 5190.6B, Chapters 15-17. The comment does not provide any specific mitigation measures it wishes LAWA to implement, but mainly cites international airports which operate under different regulations and funding structures. LAWA has worked collaboratively with Metro to make a transit connection to Metro's system, which is the first step in increasing transit ridership to LAX. LAWA will continue to work collaboratively with Metro to find ways to increase transit ridership to LAX; however, LAWA cannot mandate or directly fund this.

1 Los Angeles County Metropolitan Transportation Authority (Metro), Airport Metro Connector 96th Street Transit Station, Draft Environmental Impact Report, June 2016, Available: https://www.metro.net/projects/lax-extension/.

2 Los Angeles County Metropolitan Transportation Authority (Metro), Airport Metro Connector 96th Street Transit Station, Final Environmental Impact Report, November 2016, Available: https://www.metro.net/projects/lax-extension/.

3 Los Angeles County Metropolitan Transportation Authority (Metro), "First Measure M Project; Metro Rail Connection to LAX.

**LAMP-AL00008-68**

**Comment:** LAWA should also mitigate for the Project's significant climate change impacts by committing to lobby the major airlines to participate in the Aviation Plan recently approved by the International Civil Aviation Organization.[16] Under the Aviation Plan, which is currently voluntary, airlines will buy credits to offset emissions from individual flights. The credits will come from alternative energy

installations, forest conservation programs and other projects that prevent some amount of GHG emissions. LAWA could also develop and implement mechanisms to monitor and report current emissions, since this component of the Aviation Plan has yet to be developed. *Id*. LAWA could also establish the criteria to select conservation programs and other projects that will count toward offset credits. *Id*.

[16] *See* "Over 190 Countries Adopt Plan to Offset Air Travel Emissions," *The New York Times*, October 6, 2016, attached as Exhibit BB and *available at* http://mobile.nytimes.com/2016/10/07/science/190-countries-adopt-plan-to-offset-jetemissions.html?emc=edit_th_20161007&nl=todaysheadlines&nlid=66270403&_r=0&referer= (last visited October 7, 2016).

**Response:** Whether or not LAWA chooses to lobby airlines to participate in the Aviation Plan recently approved by the Civil Aviation Organization, there is no evidence that the Aviation Plan would be effective in substantially reducing GHG emission from for the proposed LAX Landside Access Modernization Program Project. The Aviation Plan is voluntary; thus emissions reductions from the Aviation Plan are not sufficiently quantifiable, verifiable, or enforceable to rely upon as CEQA mitigation at this time.

**LAMP-AL00008-69**

**Comment:** Other types of mitigation to reduce GHG emissions have been determined to be feasible. There are additional guidance documents that provide a full suite of GHG mitigation measures. LAWA must review and consider all of the measures listed in these documents in its revised DEIR, and it must adopt all feasible measures in order to reduce the Project's impacts to a level below significance, or as much as feasible:

- Governor's Office of Planning and Research. 2008. Technical Advisory. CEQA AND CLIMATE CHANGE: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, attached hereto as Exhibit CC.
- California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act," January 2008.[17] *See generally id.* At Chapter 9.
- CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reduction from Greenhouse Gas Mitigation Measures," August 2010.[18]
- Attorney General of the State of California, "Addressing Climate Change at the Project Level," January 2010.[19]

[17] *Available at* http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf (last visited October 7, 2016).

[18] *Available at* http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf (last visited October 7, 2016).

[19] *Available at* http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf (last visited October 7, 2016).

**Response:** LAWA has committed to adopting all feasible measures to reduce the Project's impacts related to air quality and GHG emissions. As indicated in Section 4.5.7 of the Draft EIR, LAWA has

implemented a wide range of actions designed to reduce temporary, construction-related air pollutant and GHG emissions from its ongoing construction program and has proposed as a mitigation measure the aggressive construction emissions reduction measures in Standard Control Measure (Mitigation Measure LAX-AQ-1). LAWA has also proposed as mitigation measures a range of actions designed to reduce transportation- and operations-related air pollutant and GHG emissions (Standard Control Measures (Mitigation Measures) LAX-AQ-2 and LAX-AQ-3, respectively). LAWA also proposes to implement the following GH mitigation measures: MM-GHG (LAMP)-1 – Incorporate Solar Energy into LAX Landside Access Modernization Program Facilities, and MM-AQ (LAMP)-1 – Preferential Use of Renewable Diesel Fuel.

LAWA is not required to respond in the Final EIR to lists of general suggestions for mitigation measures that are not project-specific. (*Santa Clarita Organization for Planning the Environment v. City of Santa Clarita* (2011) 197 Cal.App.4th 1042.) The commentor provides no evidence that any of the specific measures in these lists are applicable to the proposed Project, feasible, and would substantially reduce the proposed Project's GHG emissions.

Nevertheless, below is a list of measures identified in the four GHG guidance documents listed above and an analysis of their feasibility for the proposed LAX Landside Access Modernization Program Project. As can be seen below, for those measures that are applicable to the proposed Project and potentially feasible, such measures are already 1) included as part of Standard Control Measures (Mitigation Measures) LAX-AQ-1, LAX-AQ-2 or LAX-AQ-3; 2) included as part of Project-specific Mitigation Measures MM-GHG (LAMP)-1 and MM-AQ (LAMP)-1; 3) included as part of the LAX Design Guidelines Sustainability Measures (Table 4.5-16 of the Draft EIR); 4) are part of the proposed Project description/components; or 5) already required by law. As such, all feasible measures to reduce GHG emissions associated with the proposed Project have already been identified in Section 4.5.7 of the Draft EIR. The term "Scope of Project" in the table below is used to identify measures that the Project is addressing or already incorporating (see Chapter 2, Description of the Proposed Project, of the Draft EIR).

Governor's Office of Planning and Research. Technical Advisory. CEQA AND CLIMATE CHANGE: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 2008, *https://www.opr.ca.gov/docs/june08-ceqa.pdf*

| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
|---|---|---|---|---|
| Land Use and Transportation | Implement land use strategies to encourage jobs/housing proximity, promote transit-oriented development, and encourage high density development along transit corridors. Encourage compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of public transit systems. | Not Applicable | Not Applicable | Not Applicable |
| | Encourage infill, redevelopment, and higher density development, whether in incorporated or unincorporated settings. | Applicable | Potentially Feasible | Scope of Potential Future-Related Development |
| | Encourage new developments to integrate housing, civic and retail amenities (jobs, schools, parks, shopping opportunities) to help reduce VMT resulting from discretionary automobile trips. | Not Applicable | Not Applicable | Not Applicable |
| | Apply advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services. | Applicable | Potentially Feasible | Scope of Project |
| | Incorporate features into project design that would accommodate the supply of frequent, reliable and | Applicable | Potentially Feasible | Scope of Project |

Governor's Office of Planning and Research. Technical Advisory. CEQA AND CLIMATE CHANGE: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 2008, *https://www.opr.ca.gov/docs/june08-ceqa.pdf*

| Measure Category | Description | Applicability | Feasibility (Applicable Measures Only) | Implementation (Applicable and Feasible Measures Only) |
|---|---|---|---|---|
| | convenient public transit. | | | |
| | Implement street improvements that are designed to relieve pressure on a region's most congested roadways and intersections. | Applicable | Potentially Feasible | Scope of Project |
| | Limit idling time for commercial vehicles, including delivery and construction vehicles. | Applicable | Not Feasible | Required by law to be no more than 5 minutes per trip. Further reduction in idling time is unenforceable and infeasible. |
| Urban Forestry | Plant trees and vegetation near structures to shade buildings and reduce energy requirements for heating/cooling. | Not Applicable | Not Applicable | Not Applicable |
| | Preserve or replace onsite trees (that are removed due to development) as a means of providing carbon storage. | Applicable | Potentially Feasible | Already In Measures Page 4.5-50 DEIR |
| Green Buildings | Encourage public and private construction of LEED (Leadership in Energy and Environmental Design) certified (or equivalent) buildings. | Applicable | Potentially Feasible | Scope of Project Page 2-148 DEIR |
| Energy Conservation Policies and Actions | Recognize and promote energy saving measures beyond Title 24 requirements for residential and commercial projects | Applicable | Potentially Feasible | Already In Measures Page 4.5-50 DEIR |
| | Where feasible, include in new buildings facilities to support the use of low/zero carbon fueled vehicles, such as the charging of electric vehicles from green electricity sources. | Applicable | Potentially Feasible | Already In Measures Page 4.5-46 DEIR Page 4.5-49 DEIR |
| | Educate the public, schools, other jurisdictions, professional associations, business and industry about reducing GHG emissions. | Not Applicable | Not Applicable | Not Applicable |
| | Replace traffic lights, street lights, and other electrical uses to energy efficient bulbs and appliances. | Applicable | Potentially Feasible | Scope of Project Page 4.13-8 DEIR |
| | Purchase Energy Star equipment and appliances for public agency use. | Not Applicable | Not Applicable | Not Applicable |
| | Incorporate on-site renewable energy production, including installation of photovoltaic cells or other solar options. | Applicable | Potentially Feasible | Already In Measures Page 4.5-59 DEIR |
| | Execute an Energy Savings Performance Contract with a private entity to retrofit public buildings. This type of contract allows the private entity to fund all energy improvements in exchange for a share of the energy savings over a period of time. | Not Applicable | Not Applicable | Not Applicable |
| | Design, build, and operate schools that meet the Collaborative for High Performance Schools (CHPS) best practices. | Not Applicable | Not Applicable | Not Applicable |
| | Retrofit municipal water and wastewater systems with energy efficient motors, pumps and other equipment, and recover wastewater treatment methane for energy production. | Not Applicable | Not Applicable | Not Applicable |
| | Convert landfill gas into energy sources for use in fueling vehicles, operating equipment, and heating buildings. | Not Applicable | Not Applicable | Not Applicable |
| | Purchase government vehicles and buses that use alternatives fuels or technology, such as electric hybrids, biodiesel, and ethanol. Where feasible, require fleet vehicles to be low emission vehicles. Promote the use of these vehicles in the general community. | Applicable | Potentially Feasible | Already In Measures Page 4.5-46 DEIR Page 4.5-59 DEIR |

| Governor's Office of Planning and Research. Technical Advisory. CEQA AND CLIMATE CHANGE: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 2008, *https://www.opr.ca.gov/docs/june08-ceqa.pdf* | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | Offer government incentives to private businesses for developing buildings with energy and water efficient features and recycled materials. The incentives can include expedited plan checks and reduced permit fees. | Not Applicable | Not Applicable | Not Applicable |
| | Offer rebates and low-interest loans to residents that make energy-saving improvements on their homes. | Not Applicable | Not Applicable | Not Applicable |
| | Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points. | Applicable | Potentially Feasible | Scope of Project Page 4.8-17 DEIR |
| Programs to Reduce Vehicle Miles Traveled | Offer government employees financial incentives to carpool, use public transportation, or use other modes of travel for daily commutes. | Applicable | Potentially Feasible | Already in 2015 Sustainability Report Page 27 |
| | Encourage large businesses to develop commute trip reduction plans that encourage employees who commute alone to consider alternative transportation modes. | Not Applicable | Not Applicable | Not Applicable |
| | Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes. | Not Applicable | Not Applicable | Not Applicable |
| | Create an online ridesharing program that matches potential carpoolers immediately through email. | Not Applicable | Not Applicable | Not Applicable |
| | Develop a Safe Routes to School program that allows and promotes bicycling and walking to school. | Not Applicable | Not Applicable | Not Applicable |
| Programs to Reduce Solid Waste | Create incentives to increase recycling and reduce generation of solid waste by residential users. | Applicable | Potentially Feasible | Already in 2015 Sustainability Report Page 32 |
| | Implement a construction and demolition water recycling ordinance to reduce the solid waste created by new development | Applicable | Potentially Feasible | Already in 2015 Sustainability Report Page 33 |
| | Add residential/commercial food waste collection to existing greenwaste collection programs. | Not Applicable | Not Applicable | Not Applicable |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, *http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF* | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| Transportation | Nonresidential projects provide plentiful short- and long-term bicycle parking facilities to meet peak season maximum demand (e.g., one bike rack space per 20 vehicle/employee parking spaces | Applicable | Potentially Feasible | Already In Measure Page 4.5-48 DEIR |
| | Nonresidential projects provide "end-of-trip" facilities including showers, lockers, and changing space (e.g., four clothes lockers and one shower provided for every 80 employee parking spaces, separate facilities for each gender for projects with 160 or more employee parking spaces). | Applicable | Potentially Feasible | Already In Measure Page 4.5-48 DEIR |
| | Long-term bicycle parking is provided at apartment complexes or condominiums without garages (e.g., one longterm bicycle parking space for each unit without a garage). Long-term facilities shall consist of one of the following: a bicycle locker, a locked room with standard racks and access limited to bicyclists only, or a standard rack in a location that is staffed and/or monitored by video surveillance 24 hours per day. | Not Applicable | Not Applicable | Not Applicable |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | Entire project is located within one-half mile of an existing/planned Class I or Class II bike lane and project design includes a comparable network that connects the project uses to the existing offsite facility. Project design includes a designated bicycle route connecting all units, onsite bicycle parking facilities, offsite bicycle facilities, site entrances, and primary building entrances to existing Class I or Class II bike lane(s) within one half mile. Bicycle route connects to all streets contiguous with project site. Bicycle route has minimum conflicts with automobile parking and circulation facilities. All streets internal to the project wider than 75 feet have Class II bicycle lanes on both sides. | Applicable | Potentially Feasible | Already In Measure Page 4.5-48 DEIR |
| | The project provides a pedestrian access network that internally links all uses and connects to all existing/planned external streets and pedestrian facilities contiguous with the project site. Project design includes a designated pedestrian route interconnecting all internal uses, site entrances, primary building entrances, public facilities, and adjacent uses to existing external pedestrian facilities and streets. Route has minimal conflict with parking and automobile circulation facilities. Streets (with the exception of alleys) within the project have sidewalks on both sides. All sidewalks internal and adjacent to project site are minimum of five feet wide. All sidewalks feature vertical curbs. Pedestrian facilities and improvements such as grade separation, wider sidewalks, and traffic calming are implemented wherever feasible to minimize pedestrian barriers. All site entrances provide pedestrian access. | Applicable | Potentially Feasible | Scope of Project |
| | Site design and building placement minimize barriers to pedestrian access and interconnectivity. Physical barriers such as walls, berms, landscaping, and slopes between residential and nonresidential uses that impede bicycle or pedestrian circulation are eliminated. | Applicable | Potentially Feasible | Scope of Project |
| | Bus or streetcar service provides headways of one hour or less for stops within one-quarter mile; project provides safe and convenient bicycle/pedestrian access to transit stop(s) and provides essential transit stop improvements (i.e., shelters, route information, benches, and lighting). | Applicable | Potentially Feasible | Scope of Project |
| | Project design includes pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways are designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips by featuring traffic calming features. All sidewalks internal and adjacent to project site are minimum of five feet wide. All sidewalks feature vertical curbs. Roadways that converge internally within the project are routed in such a way as to avoid "skewed intersections;" which are intersections that meet at acute, rather than right, angles. Intersections internal and adjacent to the project feature one or more of the following pedestrian safety/traffic calming design techniques: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised | Applicable | Potentially Feasible | Scope of Project Page 4.5-34 DEIR |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | crosswalks, raised intersections, median islands, tight corner radii, and roundabouts or mini-circles. Streets internal and adjacent to the project feature pedestrian safety/traffic calming measures such as on-street parking, planter strips with street trees, and chicanes/chokers (variations in road width to discourage high-speed travel). | | | |
| Parking Measures | Project provides employee and/or customer paid parking system. Project must have a permanent and enforceable method of maintaining user fees for all parking facilities. The facility may not provide customer or employee validations. Daily charge for parking must be equal to or greater than the cost of a transit day/monthly pass plus 20%. | Not Applicable | Not Applicable | Not Applicable |
| | Provide minimum amount of parking required. Once land uses are determined, the trip reduction factor associated with this measure can be determined by utilizing the ITE parking generation publication. The reduction in trips can be computed as shown below by the ratio of the difference of minimum parking required by code and ITE peak parking demand to ITE peak parking demand for the land uses multiplied by 50%. Percent Trip Reduction = 50 * [(min parking required by code – ITE peak parking demand)/ (ITE peak parking demand)] | Applicable | Potentially Feasible | Already in Measure Page 4.5-49 DEIR |
| | Provide parking reduction less than code. This measure can be readily implemented through a shared parking strategy, wherein parking is utilized jointly among different land uses, buildings, and facilities in an area that experience peak parking needs at different times of day and day of the week. | Not Applicable | Not Applicable | Not Applicable |
| | Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances. | Applicable | Potentially Feasible | Scope of Project |
| | Parking facilities are not adjacent to street frontage. | Not Applicable | Not Applicable | Not Applicable |
| | Provide parking lot areas with 50% tree cover within 10 years of construction, in particular low emitting, low maintenance, native drought resistant trees. Reduces urban heat island effect and requirement for air conditioning, effective when combined with other measures (e.g., electrical maintenance equipment and reflective paving material). | Not Applicable | Not Applicable | Not Applicable |
| | Provide spaces for the operation of valet bicycle parking at community event "centers" such as amphitheaters, theaters, and stadiums. | Not Applicable | Not Applicable | Not Applicable |
| | Provide storage space in one-car garages for bicycles and bicycle trailers. | Not Applicable | Not Applicable | Not Applicable |
| | Provide preferential parking space locations for EVs/CNG vehicles. | Applicable | Potentially Feasible | Already in Measure Page 4.5-49 DEIR |
| | Provide a reduced/no parking fee for EVs/CNG vehicles. | Applicable | Potentially Feasible | Already in Measure Page 4.5-46 DEIR |
| Miscellaneous Measures | Include permanent TMA membership and funding requirement. Funding to be provided by Community Facilities District or County Service Area or other nonrevocable funding mechanism. TDMs have been shown to reduce employee vehicle trips up to 28% with the largest reductions achieved through parking pricing | Not Applicable | Not Applicable | Not Applicable |

California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF

| Measure Category | Description | Applicability | Feasibility (Applicable Measures Only) | Implementation (Applicable and Feasible Measures Only) |
|---|---|---|---|---|
| | and transit passes. The impact depends on the travel alternatives. | | | |
| | Use of and/or provide ULEV that are 50% cleaner than average new model cars (e.g., natural gas, ethanol, electric). | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 27 |
| | Use of and/or provide vehicles that utilize gasoline/ethanol blends (e.g., E85). | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 27 |
| Design | Project provides high density office or mixed-use proximate to transit. Project must provide safe and convenient pedestrian and bicycle access to all transit stops within one-quarter mile. | Applicable | Potentially Feasible | Scope of Potential Future-Related Development |
| | Project is oriented towards existing transit, bicycle, or pedestrian corridor. Setback distance between project and existing or planned adjacent uses is minimized or nonexistent. Setback distance between different buildings on project site is minimized. Setbacks between project buildings and planned or existing sidewalks are minimized. Buildings are oriented towards existing or planned street frontage. Primary entrances to buildings are located along planned or existing public street frontage. Project provides bicycle access to any planned bicycle corridor(s). Project provides pedestrian access to any planned pedestrian corridor(s). | Applicable | Potentially Feasible | Scope of Project |
| | Project provides on-site shops and services for employees. Project provides high-density residential development. Transit facilities must be within one quarter mile of project border. Project provides safe and convenient bicycle/pedestrian access to all transit stop(s) within one-quarter mile of project border. | Not Applicable | Not Applicable | Not Applicable |
| | Multiple and direct street routing (grid style). This measure only applies to projects with an internal CF >/= 0.80, and average of one-quarter mile or less between external connections along perimeter of project. [CF= # of intersections / (# of cul-de-sacs + intersections)]. Cul-de-sacs with bicycle/pedestrian through access may be considered "complete intersections" when calculating the project's internal connectivity factor. External connections are bike/pedestrian pathways and access points, or streets with safe and convenient bicycle and pedestrian access that connect the project to adjacent streets, sidewalks, and uses. If project site is adjacent to undeveloped land; streets, pathways, access points, and right-of-ways that provide for future access to adjacent uses may count for up to 50% of the external connections. Block perimeter (the sum of the measurement of the length of all block sides) is limited to no more than 1,350 feet. Streets internal to the project should connect to streets external to the project whenever possible. | Not Applicable | Not Applicable | Not Applicable |
| | Make physical development consistent with requirements for neighborhood electric vehicles. Current studies show that for most trips, NEVs do not replace gas-fueled vehicles as the primary vehicle. | Not Applicable | Not Applicable | Not Applicable |
| | Residential development projects of five or more dwelling units provide a deedrestricted low-income | Not Applicable | Not Applicable | Not Applicable |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | housing component on-site (or as defined in the code). Developers who pay into In-Lieu Fee Programs are not considered eligible to receive credit for this measure. The award of emission reduction credit shall be based only on the proportion of affordable housing developed on-site because in-lieu programs simply induce a net increase in development. Percentage reduction shall be calculated according to the following formula: % reduction = % units deed-restricted below market rate housing * 0.04 | | | |
| | Provide residential buildings with a "utility" room or space for recharging batteries, whether for use in a car, electric lawnmower, other electric landscaping equipment, or even batteries for small items such as flashlights. | Not Applicable | Not Applicable | Not Applicable |
| Mixed-Use Development Measures | Development of projects predominantly characterized by properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with functional interrelationships and a coherent physical design. | Not Applicable | Not Applicable | Not Applicable |
| | Have at least three of the following on site and/or offsite within one-quarter mile: Residential Development, Retail Development, Park, Open Space, or Office. | Applicable | Potentially Feasible | Scope of Potential Future-Related Development |
| | All residential units are within one-quarter mile of parks, schools or other civic uses. | Not Applicable | Not Applicable | Not Applicable |
| | Project site is on a vacant infill site, redevelopment area, or brownfield or greyfield lot that is highly accessible to regional destinations, where the destinations rating of the development site (measured as the weighted average travel time to all other regional destinations) is improved by 100% when compared to an alternate greenfield site. | Applicable | Potentially Feasible | Already in Measure Page 4.5-48 DEIR |
| Miscellaneous Measures | Provide a complimentary electric lawnmower to each residential buyer. | Not Applicable | Not Applicable | Not Applicable |
| | Provide infrastructure/education that promotes the avoidance of products with excessive packaging, recycle, buying of refills, separating of food and yard waste for composting, and using rechargeable batteries. | Not Applicable | Not Applicable | Not Applicable |
| | LEED promotes a whole building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. The process ensures that all building systems perform interactively according to the contract documents, the design intent and the owner's operational needs to optimize energy performance. | Applicable | Potentially Feasible | Project Description Page 2-148 DEIR |
| | Project shall use drought resistant native trees, trees with low emissions and high carbon sequestration potential. Evergreen trees on the north and west sides afford the best protection from the setting summer sun and cold winter winds. Additional considerations include the use of deciduous trees on the south side of the house that will admit summer sun; evergreen plantings on the north side will slow cold winter winds; | Applicable | Potentially Feasible | Already in Measure Page 4.5-53 DEIR |

California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF

| Measure Category | Description | Applicability | Feasibility (Applicable Measures Only) | Implementation (Applicable and Feasible Measures Only) |
|---|---|---|---|---|
| | constructing a natural planted channel to funnel summer cooling breezes into the house. Neighborhood CCR's not requiring that front and side yards of single family homes be planted with turf grass. Vegetable gardens, bunch grass, and low-water landscaping shall also be permitted, or even encouraged. | | | |
| | Project shall dedicate space in a centralized, accessible location for a weekly farmers' market. | Not Applicable | Not Applicable | Not Applicable |
| | Project shall dedicate space for community gardens. | Applicable | Potentially Feasible | Scope of Project Page 4.1-14 DEIR |
| Energy Efficiency/Building Component | Project shall use high-efficiency pumps. | Applicable | Potentially Feasible | Already in Measure Page 4.5-52 DEIR |
| | Project does not feature fireplaces or wood burning stoves. | Not Applicable | Not Applicable | Not Applicable |
| | Project features only natural gas or electric stoves in residences. | Not Applicable | Not Applicable | Not Applicable |
| | Project installs Energy Star labeled roof materials. | Applicable | Potentially Feasible | Scope of Project Page 2-147 DEIR |
| | Project provides onsite renewable energy system(s). Nonpolluting and renewable energy potential includes solar, wind, geothermal, low-impact hydro, biomass and bio-gas strategies. When applying these strategies, projects may take advantage of net metering with the local utility. | Applicable | Potentially Feasible | Already in Measure Page 4.5-59 DEIR |
| | Project exceeds title 24 requirements by 20%. | Applicable | Potentially Feasible | Similar Measures Throughout Page 4.5-50 DEIR |
| | Project orients 75% or more of homes and/or buildings to face either north or south (within 30° of N/S). Building design includes roof overhangs that are sufficient to block the high summer sun, but not the lower winter sun, from penetrating south facing windows. Trees, other landscaping features and other buildings are sited in such a way as to maximize shade in the summer and maximize solar access to walls and windows in the winter. | Applicable | Potentially Feasible | Scope of Project Page 2-147 DEIR |
| | Provide shade (within 5 years) and/or use light-colored/highalbedo materials (reflectance of at least 0.3) and/or open grid pavement for at least 30% of the site's nonroof impervious surfaces, including parking lots, walkways, plazas, etc.; OR place a minimum of 50% of parking spaces underground or covered by structured parking; OR use an open-grid pavement system (less than 50% impervious) for a minimum of 50% of the parking lot area. The mitigation measure reduces heat islands (thermal gradient differences between developed and undeveloped areas to minimize impact on microclimate and human and wildlife habitats. This measure requires the use of patented or copyright protected methodologies created by the ASTM. The SRI is a measure of the constructed surface's ability to reflect solar heat, as shown by a small rise in temperature. It is defined so that a standard black (reflectance 0.05, emittance 0.90) is "0" and a standard white (reflectance 0.80, emittance 0.90) is 100. To calculate SRI for a given material, obtain the reflectance value and emittance value for the material. SRI is calculated according to ASTM E 1980-01. | Applicable | Potentially Feasible | Already in Measure Page 4.5-50 DEIR |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | Reflectance is measured according to ASTM E 903, ASTM E 1918, or ASTM C 1549. Emittance is measured according to ASTM E 408 or ASTM C 1371. Default values for some materials will be available in the LEED-NC v2.2 Reference Guide. | | | |
| | Project optimizes building's thermal distribution by separating ventilation and thermal conditioning systems. | Not Applicable | Not Applicable | Not Applicable |
| | Install a vegetated roof that covers at least 50% of roof area. The reduction assumes that a vegetated roof is installed on a least 50% of the roof area or that a combination high albedo and vegetated roof surface is installed that meets the following standard: (Area of SRI Roof/0.75)+(Area of vegetated roof/0.5) >= Total Roof Area. Water consumption reduction measures shall be considered in the design of the green roof. | Applicable | Potentially Feasible | Already in Measure Page 4.5-50 DEIR |
| | Project installs EV charging facilities. | Applicable | Potentially Feasible | Already In Measures Page 4.5-46 DEIR Page 4.5-49 DEIR |
| | Project provides light-colored paving (e.g., increased albedo pavement). | Applicable | Potentially Feasible | Already in Measure Page 4.5-50 DEIR |
| | Project provides cool roofs. Highly reflective, highly emissive roofing materials that stay 50-60°F cooler than a normal roof under a hot summer sun. CA's Cool Savings Program provided rebates to building owners for installing roofing materials with high solar reflectance and thermal emittance. The highest rebate went to roofs on air conditioned buildings, while buildings with rooftop ducts and other nonresidential buildings were eligible for slightly less. The program aimed to reduce peak summer electricity demand and was administered by the CEC. | Applicable | Potentially Feasible | Already in Measure Page 4.5-50 DEIR |
| | Project provides solar water heaters. | Not Applicable | Not Applicable | Not Applicable |
| | Project provides electrical outlets at building exterior areas. | Applicable | Potentially Feasible | Scope of Project |
| | Project uses energy efficient appliances (e.g., Energy Star). | Not Applicable | Not Applicable | Not Applicable |
| | Project uses materials which are resource efficient, recycled, with long life cycles and manufactured in an environmentally friendly way. | Applicable | Potentially Feasible | 2015 Sustainability Plan Page 11 |
| | Install energy-reducing shading mechanisms for windows, porch, patio and walkway overhangs. | Not Applicable | Not Applicable | Not Applicable |
| | Install energy-reducing ceiling/whole-house fans. | Not Applicable | Not Applicable | Not Applicable |
| | Install energy-reducing programmable thermostats that automatically adjust temperature settings. | Applicable | Potentially Feasible | Scope of Project |
| | Install energy-reducing passive heating and cooling systems (e.g., insulation and ventilation). | Applicable | Potentially Feasible | Scope of Project Page 2-147 DEIR |
| | Install energy-reducing day lighting systems (e.g., skylights, light shelves and interior transom windows). | Applicable | Potentially Feasible | Already in Measures Page 4.5-58 DEIR |
| | Require the installation of low-water use appliances. | Applicable | Potentially Feasible | Already in Measure Page 4.5-52 DEIR |
| | Provide a spur at nonresidential projects to use nearby rail for goods movement. | Not Applicable | Not Applicable | Not Applicable |
| Social Awareness/ Education | Provide local governments, businesses, and residents with guidance/protocols/information on how to reduce GHG emissions (e.g., energy saving, food miles). | Not Applicable | Not Applicable | Not Applicable |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | Include how to reduce GHG emissions (e.g., energy saving, food miles) in the school curriculum. | Not Applicable | Not Applicable | Not Applicable |
| Construction | Use ARB-certified diesel construction equipment. Increases CO2 emissions when trapped CO and carbon particles are oxidized (Catalyst Products 2007, ETC 2007). | Applicable | Potentially Feasible | Exceeded in Measure Page 4.5-45 DEIR |
| | Use alternative fuel types for construction equipment. At the tailpipe biodiesel emits 10% more CO2 than petroleum diesel. Overall lifecycle emissions of CO2 from 100% biodiesel are 78% lower than those of petroleum diesel (NREL 1998, EPA 2007b). | Applicable | Potentially Feasible | Already in Measure Page 4.5-59 DEIR |
| | Use locally made building materials for construction of the project and associated infrastructure. | Applicable | Potentially Feasible | Already in Measure Page 4.5-53 DEIR |
| | Recycle/Reuse demolished construction material. Use locally made building materials for construction of the project and associated infrastructure. | Applicable | Potentially Feasible | Already in Measure Page 4.5-43 DEIR |
| Miscellaneous | Provide/Pay into an off-site mitigation fee program, which focuses primarily on reducing emissions from existing development and buildings through retro-fit (e.g., increased insulation). | Not Applicable | Not Applicable | Not Applicable |
| | Provide/purchase offsets for additional emissions by acquiring carbon credits or engaging in other market "cap and trade" systems. | Not Applicable | Not Applicable | Not Applicable |
| Regional Transportation Plan Measures | Evaluate the trip reduction (and GHG reduction) potential of adding HOV lanes prior to adding standard lanes. | Not Applicable | Not Applicable | Not Applicable |
| | Evaluate price elasticity and associated trip reduction (and GHG reduction) potential with adding or increasing tolls prior to adding capacity to existing highways. | Not Applicable | Not Applicable | Not Applicable |
| | - Adopt GHG reduction targets for the planning area, based on the current legislation providing direction for state-wide targets, and update the plan as necessary.<br>-The local government agency should serve as a model by inventorying its GHG emissions from agency operations, and implementing those reduction goals. | Not Applicable | Not Applicable | Not Applicable |
| Circulation | - Create a gridded street pattern with small block sizes. This promotes walkability through direct routing and ease of navigation.<br>-Maintain a high level of connectivity of the roadway network. Minimize cul-de-sacs and incomplete roadway segments.<br>-Plan and maintain an integrated, hierarchical and multi-modal system of roadways, pedestrian walks, and bicycle paths throughout the area.<br>-Apply creative traffic management approaches to address congestion in areas with unique problems, particularly on roadways and intersections in the vicinity of schools in the morning and afternoon peak hours, and near churches, parks and community centers.<br>-Work with adjacent jurisdictions to address the impacts of regional development patterns (e.g. residential development in surrounding communities, regional universities, employment centers, and commercial developments) on the circulation system.<br>-Actively promote walking as a safe mode of local travel, particularly for children attending local schools. - | Applicable | Potentially Feasible | Scope of Project |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | Employ traffic calming methods such as median landscaping and provision of bike or transit lanes to slow traffic, improve roadway capacity, and address safety issues. | | | |
| | -Encourage the transportation authority to reduce fees for short distance trips.<br>-Ensure that improvements to the traffic corridors do not negatively impact the operation of local roadways and land uses.<br>-Cooperate with adjacent jurisdictions to maintain adequate service levels at shared intersections and to provide adequate capacity on regional routes for through traffic.<br>-Support initiatives to provide better public transportation. Work actively to ensure that public transportation is part of every regional transportation corridor.<br>- Coordinate the different modes of travel to enable users to transfer easily from one mode to another.<br>-Work to provide a strong paratransit system that promotes the mobility of all residents and educate residents about local mobility choices. - Promote transit-oriented development to facilitate the use of the community's transit services. | Applicable | Potentially Feasible | Scope of Project |
| | -Promote increased use of public transportation and support efforts to increase bus service range and frequency within the area as appropriate.<br>-Enhance and encourage provision of attractive and appropriate transit amenities, including shaded bus stops, to encourage use of public transportation.<br>-Encourage the school districts, private schools and other operators to coordinate local bussing and to expand ride-sharing programs. All bussing options should be fully considered before substantial roadway improvements are made in the vicinity of schools to ease congestion. | Applicable | Potentially Feasible | Scope of Project |
| | -Improve area sidewalks and rights-of-way to make them efficient and appealing for walking and bicycling safely. Coordinate with adjacent jurisdictions and regional agencies to improve pedestrian and bicycle trails, facilities, signage, and amenities.<br>-Provide safe and convenient pedestrian and bicycle connections to and from town centers, other commercial districts, office complexes, neighborhoods, schools, other major activity centers, and surrounding communities.<br>-Work with neighboring jurisdictions to provide well-designed pedestrian and bicycle crossings of major roadways.<br>-Promote walking throughout the community. Install sidewalks where missing and make improvements to existing sidewalks for accessibility purposes. Particular attention should be given to needed sidewalk improvement near schools and activity centers.<br>-Encourage businesses or residents to sponsor street furniture and landscaped areas.<br>- Strive to provide pedestrian pathways that are well shaded and pleasantly landscaped to encourage use. | Applicable | Potentially Feasible | Scope of Project |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
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| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | - Attract bicyclists from neighboring communities to ride their bicycles or to bring their bicycles on the train to enjoy bicycling around the community and to support local businesses.<br>- Meet guidelines to become nationally recognized as a Bicycle-Friendly community.<br>- Provide for an education program and stepped up code enforcement to address and minimize vegetation that degrades access along public rights-of-way.<br>-Engage in discussions with transit providers to increase the number of bicycles that can be accommodated on buses | | | |
| | -Support regional rail and work with rail authority to expand services.<br>- Achieve better integration of all transit options.<br>-Work with regional transportation planning agencies to finance and provide incentives for multimodal transportation systems.<br>- Promote activity centers and transit-oriented development projects around the transit station. | Applicable | Potentially Feasible | Scope of Project |
| | -Encourage convenient public transit service between area and airports.<br>-Support the establishment of a local shuttle to serve commercial centers.<br>-Promote convenient, clean, efficient, and accessible public transit that serves transit-dependent riders and attracts discretionary riders as an alternative to reliance on single-occupant automobiles.<br>- Empower seniors and those with physical disabilities who desire maximum personal freedom and independence of lifestyle with unimpeded access to public transportation.<br>-Integrate transit service and amenities with surrounding land uses and buildings. | Applicable | Potentially Feasible | Scope of Project |
| Conservation, Open Space | -Reduce the amount of water used for landscaping and increase use of native and low water plants. Maximize use of native, low-water plants for landscaping of areas adjacent to sidewalks or other impermeable surfaces.<br>-Encourage the production, distribution and use of recycled and reclaimed water for landscaping projects throughout the community, while maintaining urban runoff water quality objectives.<br>-Promote water conservation measures, reduce urban runoff, and prevent groundwater pollution within development projects, property maintenance, area operations and all activities requiring approval.<br>-Educate the public about the importance of water conservation and avoiding wasteful water habits.<br>-Work with water provider in exploring water conservation programs, and encourage the water provider to offer incentives for water conservation. | Applicable | Potentially Feasible | Already in Measure<br>Page 4.5-48 DEIR<br>Page 4.5-52 DEIR<br>Page 4.5-53 DEIR |
| | -Integrate air quality planning with area land use, economic development and transportation planning efforts.<br>-Support programs that reduce air quality emissions related to vehicular travel.<br>-Support alternative transportation modes and technologies, and develop bike- and pedestrian-friendly | Applicable | Potentially Feasible | Scope of Project |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
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| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | neighborhoods to reduce emissions associated with automobile use.<br>-Encourage the use of clean fuel vehicles.<br>-Promote the use of fuel-efficient heating and cooling equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces, and boiler units.<br>- Promote the use of clean air technologies such as fuel cell technologies, renewable energy sources. UV coatings, and alternative, non-fossil fuels.<br>-Require the planting of street trees along streets and inclusion of trees and landscaping for all development projects to help improve airshed and minimize urban heat island effects.<br>- Encourage small businesses to utilize clean, innovative technologies to reduce air pollution.<br>- Implement principles of green building.<br>- Support jobs/housing balance within the community so more people can both live and work within the community. To reduce vehicle trips, encourage people to telecommute or work out of home or in local satellite offices. | | | |
| | -Encourage green building designs for new construction and renovation projects within the area.<br>-Coordinate with regional and local energy suppliers to ensure adequate supplies of energy to meet community needs, implement energy conservation and public education programs, and identify alternative energy sources where appropriate.<br>-Encourage building orientations and landscaping that enhance natural lighting and sun exposure.<br>-Encourage expansion of neighborhood-level products and services and public transit opportunities throughout the area to reduce automobile use.<br>- Incorporate the use of energy conservation strategies in area projects.<br>- Promote energy-efficient design features, including appropriate site orientation, use of light color roofing and building materials, and use of evergreen trees and wind-break trees to reduce fuel consumption for heating and cooling.<br>-Explore and consider the cost/benefits of alternative fuel vehicles including hybrid, natural gas, and hydrogen powered vehicles when purchasing new vehicles.<br>-Continue to promote the use of solar power and other energy conservation measures.<br>- Encourage residents to consider the cost/benefits of alternative fuel vehicles.<br>- Promote the use of different technologies that reduce use of non-renewable energy resources.<br>-Facilitate the use of green building standards and LEED in both private and public projects.<br>-Promote sustainable building practices that go beyond the requirements of Title 24 of the California Administrative Code, and encourage energy-efficient design elements, as appropriate.<br>-Support sustainable building practices that integrate | Applicable | Potentially Feasible | Scope of Project |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | building materials and methods that promote environmental quality, economic vitality, and social benefit through the design, construction, and operation of the built environment. - Investigate the feasibility of using solar (photovoltaic) street lights instead of conventional street lights that are powered by electricity in an effort to conserve energy.<br>- Encourage cooperation between neighboring development to facilitate on-site renewable energy supplies or combined heat and power co-generation facilities that can serve the energy demand of contiguous development. | | | |
| | - Develop a tree planting policy that strives to accomplish specific % shading of constructed paved and concrete surfaces within five years of construction.<br>-Provide adequate funding to manage and maintain the existing forest, including sufficient funds for tree planting, pest control, scheduled pruning, and removal and replacement of dead trees.<br>-Coordinate with local and regional plant experts in selecting tree species that respect the natural region in which Claremont is located, to help create a healthier, more sustainable urban forest.<br>- Continue to plant new trees (in particular native tree species where appropriate), and work to preserve mature native trees.<br>-Increase the awareness of the benefits of street trees and the community forest through an area wide education effort.<br>-Encourage residents to properly care for and preserve large and beautiful trees on their own private property. | Applicable | Potentially Feasible | Already in Measure Page 4.5-53 DEIR |
| Housing | -Encourage development of affordable housing opportunities throughout the community, as well as development of housing for elderly and low and moderate income households near public transportation services.<br>-Ensure a portion of future residential development is affordable to low and very low income households. | Not Applicable | Not Applicable | Not Applicable |
| Land Use | -Preserve the current pattern of development that encourages more intense and higher density development at the core of the community and less intense uses radiating from the central core.<br>-Create and enhance landscaped greenway, trail and sidewalk connections between neighborhoods and to commercial areas, town centers, and parks.<br>-Identify ways to visually identify and physically connect all portions of the community, focusing on enhanced gateways and unifying isolated and/or outlying areas with the rest of the area.<br>-Study and create a diverse plant identity with emphasis on drought-resistant native species. | Not Applicable | Not Applicable | Not Applicable |
| | -Attract a broad range of additional retail, medical, and office uses providing employment at all income levels.<br>-Support efforts to provide beneficial civic, religious, recreational, cultural and educational opportunities and public services to the entire community.<br>-Coordinate with public and private organizations to maximize the availability and use of parks and | Applicable | Potentially Feasible | Scope of Project |

| California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | recreational facilities in the community.<br>-Support development of hotel and recreational commercial land uses to provide these amenities to local residents and businesses. | | | |
| | -Require recycling, composting, source reduction and education efforts throughout the community, including residential, businesses, industries, and institutions, within the construction industry, and in all sponsored activities. | Applicable | Potentially Feasible | Part of Design Guidelines and Sustainability Report |
| | -Work to expand and improve community recreation amenities including parks, pedestrian trails and connections to regional trail facilities.<br>-As a condition upon new development, require payment of park fees and/or dedication and provision of parkland, recreation facilities and/or multi-use trails that improve the public and private recreation system.<br>-Research options or opportunities to provide necessary or desired community facilities. | Not Applicable | Not Applicable | Not Applicable |
| | - Encourage sustainable development that incorporates green building best practices and involves the reuse of previously developed property and/or vacant sites within a built-up area.<br>- Encourage the conservation, maintenance, and rehabilitation of the existing housing stock.<br>-Encourage development that incorporates green building practices to conserve natural resources as part of sustainable development practices.<br>-Avoid development of isolated residential areas in the hillsides or other areas where such development would require significant infrastructure investment, adversely impact biotic resources.<br>- Provide land area zoned for commercial and industrial uses to support a mix of retail, office, professional, service, and manufacturing businesses. | Not Applicable | Not Applicable | Not Applicable |
| | -Provide pedestrian amenities, traffic-calming features, plazas and public areas, attractive streetscapes, shade trees, lighting, and retail stores at activity nodes.<br>-Provide for a mixture of complementary retail uses to be located together to create activity nodes to serve adjacent neighborhoods and to draw visitors from other neighborhoods and from outside the area. | Applicable | Potentially Feasible | Scope of Project |
| | -Provide crosswalks and sidewalks along streets that are accessible for people with disabilities and people who are physically challenged.<br>-Provide lighting for walking and nighttime activities, where appropriate.<br>-Provide transit shelters that are comfortable, attractive, and accommodate transit riders. | Applicable | Potentially Feasible | Scope of Project<br>Page 4.8-47 DEIR |
| | - Provide sidewalks where they are missing, and provide wide sidewalks where appropriate with buffers and shade so that people can walk comfortably.<br>-Make walking comfortable at intersections through traffic-calming, landscaping, and designated crosswalks.<br>-Look for opportunities for connections along easements & other areas where vehicles not permitted. | Applicable | Potentially Feasible | Scope of Project<br>Page 4.5-34 DEIR |
| | -Provide benches, streetlights, public art, and other amenities in public areas to attract pedestrian activities. | Applicable | Potentially Feasible | Scope of Project<br>Page 4.1-9 DEIR |

California Air Pollution Control Officers Association (CAPCOA), "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, *http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF*

| Measure Category | Description | Applicability | Feasibility (Applicable Measures Only) | Implementation (Applicable and Feasible Measures Only) |
|---|---|---|---|---|
| | -Encourage new developments to incorporate drought tolerant and native landscaping that is pedestrian friendly, attractive, and consistent with the landscaped character of area.<br>-Encourage all new development to preserve existing mature trees.<br>-Encourage streetscape design programs for commercial frontages that create vibrant places which support walking, bicycling, transit, and sustainable economic development.<br>-Encourage the design and placement of buildings on lots to provide opportunities for natural systems such as solar heating and passive cooling.<br>- Ensure that all new industrial development projects are positive additions to the community setting, provide amenities for the comfort of the employees such as outdoor seating area for breaks or lunch, and have adequate landscape buffers. | | | |
| | - Identify all underused properties in the plan area and focus development in these opportunity sites prior to designating new growth areas for development.<br>- Implement programs to retro-fit existing structures to make them more energy-efficient.<br>-Encourage compact development, by placing the desired activity areas in smaller spaces. | Applicable | Potentially Feasible | Scope of Project |
| Public Safety | - Foster an environment of trust by ensuring non-biased policing, and by adopting policies and encouraging collaboration that creates transparency.<br>- Facilitate traffic safety for motorists and pedestrians through proper street design and traffic monitoring. | Not Applicable | Not Applicable | Not Applicable |

CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures," August 2010, *https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/capcoa_quantifying_ghg_measures.pdf*

| Measure Category | Description | Applicability | Feasibility (Applicable Measures Only) | Implementation (Applicable and Feasible Measures Only) |
|---|---|---|---|---|
| Energy – Building Energy Use | Buildings Exceed Title 24 Building Envelope Energy Efficiency Standards by X% | Applicable | Potentially Feasible | Already in Measure Page 4.5-50 DEIR |
| | Install Programmable Thermostat Timers | Applicable | Potentially Feasible | Scope of Project |
| | Obtain Third-party HVAC Commissioning and Verification of Energy Savings | Applicable | Potentially Feasible | Part of Design Guidelines |
| | Install Energy Efficient Appliances | Not Applicable | Not Applicable | Not Applicable |
| | Install Energy Efficient Boilers | Not Applicable | Not Applicable | Not Applicable |
| Energy - Lighting | Install Higher Efficiency Public Street and Area Lighting | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 23 |
| | Limit Outdoor Lighting Requirements | Applicable | Potentially Feasible | Already in Measure Page 4.5-50 DEIR |
| | Replace Traffic Lights with LED Traffic Lights | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 23 |
| Energy - Alternative | Establish Onsite Renewable | Applicable | Potentially Feasible | See Solar |

CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures," August 2010, *https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/capcoa_quantifying_ghg_measures.pdf*

| Measure Category | Description | Applicability | Feasibility (Applicable Measures Only) | Implementation (Applicable and Feasible Measures Only) |
|---|---|---|---|---|
| Energy Generation | Energy Systems - Generic | | | |
| | Establish Onsite Renewable Energy Systems - Solar | Applicable | Potentially Feasible | Commitment is made to Solar Renewable Energy Systems |
| | Establish Onsite Renewable Energy Systems – Wind | Applicable | Potentially Feasible | Already in Measure Page 4.5-59 DEIR |
| | Utilized a Combined Heat and Power System | Not Applicable | Not Applicable | Not Applicable |
| | Establish Methane Recovery in Landfills | Not Applicable | Not Applicable | Not Applicable |
| | Establish Methane Recovery in Wastewater Treatment Plants | Not Applicable | Not Applicable | Not Applicable |
| Transportation – Land Use / Location | Increase Density | Applicable | Potentially Feasible | Scope of Potential Future-Related Development |
| | Increase Location Efficiency | Applicable | Potentially Feasible | Scope of Project |
| | Increase Diversity of Urban and Suburban Developments (Mixed Use) | Not Applicable | Not Applicable | Not Applicable |
| | Increase Destination Accessibility | Applicable | Potentially Feasible | Scope of Project |
| | Increase Transit Accessibility | Applicable | Potentially Feasible | Scope of Project |
| | Integrate Affordable and Below Market Rate Housing | Not Applicable | Not Applicable | Not Applicable |
| | Orient Project Toward Non-Auto Corridor | Not Applicable | Not Applicable | Not Applicable |
| | Locate Project Near Bike Path/Bike Lane | Applicable | Potentially Feasible | Scope of Project Page 4.8-17 DEIR |
| | Improve Design of Development | Applicable | Potentially Feasible | Scope of Project |
| Transportation – Neighborhood / Site Enhancements | Provide Pedestrian Network Improvement | Applicable | Potentially Feasible | Scope of Project |
| | Provide Traffic Calming Measures | Applicable | Potentially Feasible | Scope of Project |
| | Implement a Neighborhood Electric Vehicle Network | Not Applicable | Not Applicable | Not Applicable |
| | Create Urban Non-Motorized Zones | Not Applicable | Not Applicable | Not Applicable |
| | Incorporate Bike Lane Street Design (on-site) | Applicable | Potentially Feasible | Scope of Project Page 4.8-17 DEIR |
| | Provide Bike Parking in Non-Residential Projects | Applicable | Potentially Feasible | Already in Measure Page 4.5-48 DEIR |
| | Provide Bike Parking with Multi-Unit Residential Projects | Not Applicable | Not Applicable | Not Applicable |
| | Provide Electric Vehicle Parking | Applicable | Potentially Feasible | Already in Measure Page 4.5-49 DEIR |
| | Dedicate Land for Bike Trails | Applicable | Potentially Feasible | Scope of Project |
| Transportation – Parking Policy/Pricing | Limit Parking Supply | Applicable | Potentially Feasible | Already in Measure Page 4.5-49 DEIR |
| | Unbundle Parking Costs from Property Cost | Not Applicable | Not Applicable | Not Applicable |
| | Implement Market Price Public Parking (On-Street) | Not Applicable | Not Applicable | Not Applicable |
| | Require Residential Area Parking Permits | Not Applicable | Not Applicable | Not Applicable |
| Transportation – Commute Trip Reduction Programs | Implement Commute Trip Reduction Program – Voluntary | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 28 |
| | Implement Commute Trip Reduction Program – Required | Applicable | Potentially Feasible | Already in Measure Page 4.12-79 DEIR |
| | Implementation / Monitoring | Applicable | Potentially Feasible | Already in Measure Page 4.12-79 DEIR |

| CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures," August 2010, *https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/capcoa_quantifying_ghg_measures.pdf* | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | Provide Ride-Sharing Programs | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 28 |
| | Implement Subsidized or Discounted Transit Program | Applicable | Potentially Feasible | Already in Measure Page 4.12-79 DEIR |
| | Provide End of Trip Facilities | Applicable | Potentially Feasible | Already in Measure Page 4.5-48 DEIR |
| | Encourage Telecommuting and Alternative work Schedules | Not Applicable | Not Applicable | Not Applicable |
| | Implement Commute Trip Reduction Marketing | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 28 |
| | Implement Preferential Parking Permit Program | Not Applicable | Not Applicable | Not Applicable |
| | Implement Car-Sharing Program | Applicable | Potentially Feasible | Already in Measure Page 4.12-79 DEIR |
| | Implement a School Pool Program | Not Applicable | Not Applicable | Not Applicable |
| | Provide Employer-Sponsored Vanpool/Shuttle | Applicable | Potentially Feasible | Already in Measure Page 4.12-79 DEIR |
| | Implement Bike-Sharing Programs | Not Applicable | Not Applicable | Not Applicable |
| | Implement School Bus Program | Not Applicable | Not Applicable | Not Applicable |
| | Price Workplace Parking | Not Applicable | Not Applicable | Not Applicable |
| | Implement Employee Parking "Cash-Out" | Not Applicable | Not Applicable | Not Applicable |
| Transportation – Transit System Improvements | Provide a Bus Rapid Transit System | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 27 |
| | Implement Transit Access Improvements | Applicable | Potentially Feasible | Scope of Project |
| | Expand Transit Network | Applicable | Potentially Feasible | Scope of Project |
| | Increase Transit Service Frequency/Speed | Applicable | Potentially Feasible | Scope of Project |
| | Provide Bike Parking Near Transit | Applicable | Potentially Feasible | Already in Measure Page 4.5-48 DEIR |
| | Provide Local Shuttles | Applicable | Potentially Feasible | Scope of Project |
| Transportation – Road Pricing/Management | Implement Area or Cordon Pricing | Applicable | Potentially Feasible | Scope of Project |
| | Improve Traffic Flow | Applicable | Potentially Feasible | Scope of Project |
| | Required Project Contributions to Transportation Infrastructure Improvement Projects | Applicable | Potentially Feasible | Scope of Project |
| | Install Park-And-Ride Lots | Not Applicable | Not Applicable | Not Applicable |
| Transportation – Vehicles | Electrify Loading Docks and/or Require Idling-Reduction Systems | Applicable | Potentially Feasible | LAWA Policy |
| | Utilize Alternative Fueled Vehicles | Applicable | Potentially Feasible | Already in Measure Page 4.5-46 DEIR |
| | Utilize Electric or Hybrid Vehicles | Applicable | Potentially Feasible | Already in Measure Page 4.5-46 DEIR |
| Water – Water Supply | Use Reclaimed Water | Applicable | Potentially Feasible | Already in Measure Page 4.5-54 DEIR |
| | Use Gray Water | Applicable | Potentially Feasible | Already in Measure Page 4.5-51 DEIR |
| | Use Locally Sourced Water Supply | Applicable | Potentially Feasible | Already in Measure Page 4.5-54 DEIR |
| Water – Water Use | Install Low-Flow Water Fixtures | Applicable | Potentially Feasible | Already in Measure |

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| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | | | | Page 4.5-52 DEIR |
| | Adopt a Water Conservation Strategy | Applicable | Potentially Feasible | Already in Measures Pages 4.5-47 – 4.5-58 DEIR |
| | Design Water-Efficient Landscapes | Applicable | Potentially Feasible | Already in Measure Page 4.5-53 DEIR |
| | Use Water-Efficient Landscape Irrigation Systems | Applicable | Potentially Feasible | Already in Measure Page 4.5-52 DEIR |
| | Reduce Turf in Landscapes and Lawns | Applicable | Potentially Feasible | Part of Design Guidelines |
| | Plant Native or Drought-Resistant Trees and Vegetation | Applicable | Potentially Feasible | Already in Measure Page 4.5-53 DEIR |
| Area Landscaping – Landscaping Equipment | Prohibit Gas Powered Landscape Equipment | Applicable | Potentially Feasible | Similar to Measure Page 4.5-47 DEIR |
| | Implement Lawnmower Exchange Program | Not Applicable | Not Applicable | Not Applicable |
| | Electric Yard Equipment Compatibility | Applicable | Potentially Feasible | Similar to Measure Page 4.5-47 DEIR |
| Solid Waste – Solid Waste | Institute of Extend Recycling and Composting Services | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 32 |
| | Recycle Demolished Construction Material | Applicable | Potentially Feasible | Already in Measure Page 4.5-43 DEIR |
| Vegetation – Vegetation | Urban Tree Planting | Applicable | Potentially Feasible | Already in Measure Page 4.5-53 DEIR |
| | Create New Vegetated Open Space | Applicable | Potentially Feasible | Already in Measure Page 4.5-53 DEIR |
| Construction – Construction | Use Alternative Fuels for Construction Equipment | Applicable | Potentially Feasible | Already in Measure Page 4.5-43 DEIR |
| | Use Electric and Hybrid Construction Equipment | Applicable | Not Feasible | Best Available Construction Equipment required in Measure Page 4.5-45 DEIR |
| | Limit Construction Equipment Idling beyond Regulation Requirements | Applicable | Not Feasible | Required by law to be no more than 5 minutes per trip. Further reduction in idling time is unenforceable and unfeasible. |
| | Institute a Heavy-Duty Off-Road Vehicle Plan | Applicable | Potentially Feasible | Already in Measure Page 4.5-44 DEIR |
| | Implement a Construction Vehicle Inventory Tracking System | Applicable | Potentially Feasible | Already in Measure Page 4.2-54 DEIR |
| Miscellaneous – Miscellaneous | Establish a Carbon Sequestration Project | Not Applicable | Not Applicable | Not Applicable |
| | Establish Off-Site Mitigation | Not Applicable | Not Applicable | Not Applicable |
| | Use Local and Sustainable Building Materials | Applicable | Potentially Feasible | Already in Measure Page 4.5-53 DEIR |
| | Require Best Management Practices in Agriculture and Animal Operations | Not Applicable | Not Applicable | Not Applicable |
| | Require Environmentally Responsible Purchasing | Applicable | Potentially Feasible | Policy in Development |
| | Implement an Innovative Strategy for GHG Mitigation | Applicable | Potentially Feasible | Part of Airport Carbon Accreditation |
| General Plans – General Plans | Fund Incentives for Energy Efficiency | Applicable | Potentially Feasible | Already in 2015 Sustainability Report Page 32 |
| | Establish a Local Farmer's Market | Not Applicable | Not Applicable | Not Applicable |
| | Establish Community Gardens | Not Applicable | Not Applicable | Not Applicable |

CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures," August 2010, *https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/capcoa_quantifying_ghg_measures.pdf*

| Measure Category | Description | Applicability | Feasibility (Applicable Measures Only) | Implementation (Applicable and Feasible Measures Only) |
|---|---|---|---|---|
| | Plant Urban Shade Trees | Applicable | Potentially Feasible | Scope of Project Page 4.1-14 DEIR |
| | Implement Strategies to Help Reduce Urban Heat-Island Effect | Applicable | Potentially Feasible | Already in Measure Page 4.5-49 DEIR |

Attorney General of the State of California, "Addressing Climate Change at the Project Level," January 2010, *http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf*

| Measure Category | Description | Applicability | Feasibility (Applicable Measures Only) | Implementation (Applicable and Feasible Measures Only) |
|---|---|---|---|---|
| Energy Efficiency | Incorporate green building practices and design elements | Applicable | Potentially Feasible | Already in Measure Page 4.5-53 DEIR |
| | Meet recognized green building and energy efficiency benchmarks (i.e. energy star, Title 24, LEED) | Applicable | Potentially Feasible | Scope of Project Page 2-148 DEIR |
| | Install energy efficient lighting (e.g. LEDs, heating and cooling systems, appliances, equipment, control systems) | Applicable | Potentially Feasible | Scope of Project Page 4.13-8 DEIR |
| | Use passive solar design (design structures to maximize solar heating in cold season and minimize solar heating in hot season) | Applicable | Potentially Feasible | Scope of Project Page 2-147 DEIR |
| | Install light colored "cool" roofs and cool pavements | Applicable | Potentially Feasible | Scope of Project Page 2-147 DEIR |
| | Install efficient lighting (LEDs) for traffic, street, and other outdoor lighting | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 23 |
| | Reduce unnecessary outdoor lighting | Applicable | Potentially Feasible | Already in Measure Page 4.5-50 DEIR |
| | Use automatic covers, efficient pumps and motors, and solar heating for pools and spas | Not Applicable | Not Applicable | Not Applicable |
| | Provide education on energy efficiency to residents, customers, and/or tenants. | Not Applicable | Not Applicable | Not Applicable |
| Renewable Energy and Energy Storage | Meet "Reach" goals for building energy efficiency and renewable energy use | Applicable | Potentially Feasible | Already in Measure Page 4.5-50 DEIR |
| | Install solar, wind and geothermal power systems and solar hot water heaters | Applicable | Potentially Feasible | Already in Measure Page 4.5-59 DEIR |
| | Install solar panels on unused roof and ground space and over carports and parking areas | Applicable | Potentially Feasible | Already in Measure Page 4.5-59 DEIR |
| | Where solar systems cannot feasibly be incorporated into the project at the outset build "solar ready" structures | Applicable | Potentially Feasible | Already in Measure Page 4.5-50 DEIR |
| | Incorporate wind and solar energy systems into agricultural projects where appropriate | Not Applicable | Not Applicable | Not Applicable |
| | Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use | Applicable | Potentially Feasible | Studied as part of Measure Page 4.5-59 DEIR |
| | Use on-site generated biogas, including methane, in appropriate applications | Not Applicable | Not Applicable | Not Applicable |
| | Use combined heat and power (CHP) in appropriate applications. | Not Applicable | Not Applicable | Not Applicable |
| Water Conservation and Efficiency | Incorporate Water-reducing features into building and landscape design | Applicable | Potentially Feasible | Already in Measure Page 4.5-52 DEIR |
| | Create water-efficient landscapes | Applicable | Potentially Feasible | Already in Measure Page 4.5-52 DEIR |
| | Install water-efficient irrigation systems and devices such as soil moisture based irrigation controls and use water-efficient irrigation methods | Applicable | Potentially Feasible | Already in Measure Page 4.5-52 DEIR |

| Attorney General of the State of California, "Addressing Climate Change at the Project Level," January 2010, *http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf* | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | Make effective use of graywater | Applicable | Potentially Feasible | Already in Measure Page 4.5-51 DEIR |
| | Implement low impact development practices that maintain the existing hydrology of the site to manage storm water and protect the environment | Applicable | Potentially Feasible | Already in Measure Page 4.5-48 DEIR |
| | Devise a comprehensive water conservation strategy appropriate for the project and location | Applicable | Potentially Feasible | Already in Measures Pages 4.5-47 – 4.5-58 DEIR |
| | Design buildings to be water efficient. Install water efficient fixtures and other appliances | Applicable | Potentially Feasible | Already in Measure Page 4.5-52 DEIR |
| | Offset water demand from new projects so that there is no net increase in water use. | Not Applicable | Not Applicable | Not Applicable |
| | Provide education about water conservation and available programs and incentives | Not Applicable | Not Applicable | Not Applicable |
| Solid Waste Measures | Reuse and recycle construction and demolition waste | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 32 |
| | Integrate reuse and recycling into residential, industrial, institutional and commercial projects. | Not Applicable | Not Applicable | Not Applicable |
| | Provide easy and convenient recycling opportunities for residents, the public, and tenant businesses | Applicable | Potentially Feasible | Already in 2015 Sustainability Page 32 |
| | Provide education and publicity about reducing waste and available recycling services. | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 32 |
| Land Use Measures | Ensure consistency with "smart growth" principles – mixed-use, infill, and higher density projects that provide alternatives to individual vehicle travel and promote the efficient delivery of services and goods. | Not Applicable | Not Applicable | Not Applicable |
| | Meet recognized "smart growth" benchmarks | Not Applicable | Not Applicable | Not Applicable |
| | Educate the public about the many benefits of well-designed, higher density development. | Not Applicable | Not Applicable | Not Applicable |
| | Incorporate public transit into the project's design | Applicable | Potentially Feasible | Scope of Project |
| | Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio | Applicable | Potentially Feasible | Already required by City Ordinance Page 4.3-7 DEIR; Already in Measure Pages 4.3-10 and 4.3-11 DEIR |
| | Develop brownfields and other underused or defunct properties near existing public transportation and jobs. | Applicable | Potentially Feasible | Already in Measure Page 4.5-48 |
| | Include pedestrian and bicycle facilities within projects and ensure that existing non-motorized routes are maintained and enhanced. | Applicable | Potentially Feasible | Already In Measure Page 4.5-48 DEIR |
| Transportation and Motor Vehicles | Meet and identified transportation-related benchmark | Not Applicable | Not Applicable | Not Applicable |
| | Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation | Applicable | Potentially Feasible | Scope of Project |
| | Build or fund a major transit stop within or near the development | Applicable | Potentially Feasible | Scope of Project |
| | Provide public transit incentives such as free or low-cost monthly transit passes to employees or free ride areas to residents and customers | Applicable | Potentially Feasible | Part of Measure Page 4.12-179 DEIR |
| | Promote "least polluting" ways to connect people and goods to their destination | Applicable | Potentially Feasible | Scope of Project |
| | Incorporating bicycle lanes, routes, and facilities into street systems, new subdivisions, and large | Applicable | Potentially Feasible | Already In Measure Page 4.5-48 DEIR |

| Attorney General of the State of California, "Addressing Climate Change at the Project Level," January 2010, *http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf* | | | | |
|---|---|---|---|---|
| **Measure Category** | **Description** | **Applicability** | **Feasibility (Applicable Measures Only)** | **Implementation (Applicable and Feasible Measures Only)** |
| | developments | | | |
| | Require amenities for non-motorized transportation such as secure and convenient bicycle parking. | Applicable | Potentially Feasible | Already In Measure Page 4.5-48 DEIR |
| | Ensure that the project enhances, and does not disrupt or create barriers to, non-motorized transportation. | Applicable | Potentially Feasible | Scope of Project |
| | Connect parks and open space through shared pedestrian/bike paths and trails to encourage walking and bicycling. Create bicycle lanes and walking paths directed to the location of schools, parks, and other destinations points. | Applicable | Potentially Feasible | Scope of Project |
| | Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles. | Not Applicable | Not Applicable | Not Applicable |
| | Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation. | Not Applicable | Not Applicable | Not Applicable |
| | Provide information on alternative transportation options for consumers, residents, tenants, and employees to reduce transportation-related emissions. | Applicable | Potentially Feasible | Part of Measure Page 4.12-179 DEIR |
| | Educate consumers, residents, tenants, and the public about options for reducing motor vehicle-related GHG emissions. Include information on trip reduction, trip linking, vehicle performance, and efficiency. (e.g. keeping tires inflated or LEV/ZEV) | Applicable | Potentially Feasible | Part of Measure Page 4.12-179 DEIR |
| | Purchase or create incentives for LEV/ZEV | Applicable | Potentially Feasible | Already in Measure Page 4.5-46 DEIR |
| | Create a ride-sharing program. Promote existing ride sharing programs (e.g. by designation a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles and providing a web site or message board for coordinating rides. | Applicable | Potentially Feasible | Already in 2015 Sustainability Plan Page 27 |
| | Create or accommodate car sharing programs (e.g. provide parking spaces for car share vehicles at convenient locations accessible by public transportation. | Applicable | Potentially Feasible | Part of Measure Page 4.12-179 DEIR |
| | Provide a vanpool for employees | Applicable | Potentially Feasible | Part of Measure Page 4.12-179 DEIR |
| | Create local "light vehicle" networks such as neighborhood electric vehicle systems. | Not Applicable | Not Applicable | Not Applicable |
| | Enforce and follow limits idling time for commercial vehicle, including delivery and construction vehicles. | Applicable | Potentially Feasible | Required by law |
| | Provide the necessary facilities and infrastructure to encourage the use of LEV/ZEV | Applicable | Potentially Feasible | Already in Measures Page 4.5-46 DEIR Page 4.5-49 DEIR |
| Agriculture and Forestry | Require best management practices in agriculture and animal operations to reduce emissions, conserve energy and water, and utilized alternative energy sources, including biogas, wind and solar. | Not Applicable | Not Applicable | Not Applicable |
| | Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas, and other open space that provide carbon sequestration benefits. | Not Applicable | Not Applicable | Not Applicable |
| | Protect existing trees and encourage the planting of new trees. Adopt a tree protection and replacement ordinance. | Applicable | Potentially Feasible | Already in Measure Page 4.5-54 DEIR |

**LAMP-AL00008-70**

**Comment:** **X. The DEIR Fails to Adequately Analyze or Mitigate the Project's Air Quality Impacts.**

**A. The DEIR Underestimates the Project's Air Quality Impacts Because it Does Not Include Emissions From Aircraft or Ground Support Equipment.**

Many of the flaws in the DEIR's analysis of the Project's GHG analysis also implicate the air quality analysis. For example, as discussed above, the DEIR inappropriately assumes that the Project would not increase the number of flights or the number of passengers at LAX. DEIR at 4.2-10. This faulty assumption causes the DEIR to substantially underestimate the Project's increase in criteria air pollutant emissions. Specifically, the DEIR's analysis of operational-related air quality impacts only accounts for emissions from automobiles and trucks and stationary and area sources of emissions. DEIR at 4.2-10 and Table 4.2.1-4; *id*. at 4.2-27. It does not account for the increase in emissions from aircraft or the ground support equipment that would occur as a result of LAX's planned growth in passenger activity. The DEIR must take into account emissions from aircraft and ground support equipment as these emissions would be expected to greatly increase with LAX's planned increase in passenger activity.

**Response:** This comment raises the issue of induced growth. Please see Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-8, and LAMP-AL00008-27 regarding induced growth and the LAX Landside Access Modernization Program Project. The Draft EIR adequately addresses air quality impacts associated with the LAX Landside Access Modernization Program Project in Sections 4.2, Air Quality and Human Health Risk.

As outlined in Section 4.2.15.1 of the Draft EIR, "SCAQMD has developed CEQA construction and operational-related thresholds of significance for air pollutant emissions from projects proposed in the Basin." As noted further on page 4.2-52 of the Draft EIR, these thresholds are used for both project specific and cumulative impacts. This methodology was expressly upheld in *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 933.

**LAMP-AL00008-71**

**Comment:** **B. The DEIR Relies on Faulty VMT Assumptions to Conclude the Project Would Result in a Reduction in Criteria Air Pollutants.**

The DEIR concludes that the regional air quality impacts associated with operation of the Project (the "2015 With Project" compared to the "2015 Existing Conditions" scenarios) would be less than significant, and that all criteria air pollutant emissions would actually decline as a result of the Project. DEIR Table 4.2.1-9 at 4.2-36. The DEIR asserts that this decline in emissions is because the Project would cause a reduction in VMT. *Id.* The DEIR's technical appendix, however, contradicts the DEIR's VMT assumptions. Appendix F reveals a trend of increasing, not decreasing, VMT. *See* DEIR Appendix F, at PDF pages 724 –728. Specifically, the Appendix identifies 2015 Baseline VMT as 2,107,251; VMT with the Project in 2024 is estimated to be 2,594,506; and VMT with the Project in 2035 is estimated to be 2,568,018. Inasmuch as VMT in 2024 and 2035 would exceed baseline (2015) levels of VMT, the DEIR's assertion that criteria air pollutants would decline as a result of the Project lacks credibility.

**Response:** The commentor first summarizes the comparison between "2015 Existing With Project" against "2015 Existing Conditions" which determined that there would be reduced pollutant concentrations with implementation of the proposed Project The commentor then asserts that VMT reduction assumptions in Section 4.2.1, Air Quality, of the Draft EIR are inconsistent with VMT data in Draft EIR Appendix F at pages 724-728 of the appendix PDF.

The commentor reaches this conclusion by utilizing the incorrect methodology (i.e. comparing 2024 conditions with project against 2015 existing conditions). The air quality impact analysis for the proposed Project was developed to determine operational significance by comparing each horizon year (2015, 2024, and 2035) with the Project *against the same year without the Project*, as noted in Section 4.2.1.5 in the paragraphs under "Scenarios Used to Determine Significance for the Proposed Project Emissions," on page 4.2-28 of the Draft EIR. Please also see Response to Comment LAMP-AL00006-1 regarding the selection of the environmental baseline used for traffic and air quality impact analyses. Using the approach, and reviewing the VMT values in Appendix F, one can see that the VMT values with the project are lower than the VMT values without the project. The VMT values in 2015 With Project is lower by 98,559 miles than VMT values 2015 Existing Conditions (see pages 722 and 723 of the Appendix F PDF), 2024 With Project is lower by 116,968 miles than 2024 Without Project (see pages 725 and 726 of the Appendix F PDF), and 2035 With Project is lower by 345,361 miles than 2035 Without Project (see pages 727 and 728 of the Appendix F PDF). Clearly the project would reduce regional VMT when compared to the without project scenario for each horizon year, and the emissions are also reduced as shown in the Draft EIR, Section 4.2.1.6, Tables 4.2.1-9, 4.2.1-10, and 4.2.1-11 (on pages 4.2-36, 4.2-37, and 4.2-38, respectively).

In conclusion, the air quality analysis of regional operational emissions was conducted correctly, and the results indicate the regional operational emissions would be less than significant for the Landside Access Modernization Program Project. Please also see Response to Comment LAMP-AL00008-2 for discussion of ambient growth. Please also see Response to Comment LAMP-AL00008-57 for a parallel discussion of the Draft EIR's choice of baseline scenarios for the greenhouse gas impact analysis.

**LAMP-AL00008-72**

**Comment:** Moreover, as we explained in the transportation section of this letter, the DEIR underestimates predicted traffic volumes because it fails to take into account the Project's induced travel demand. Inasmuch as the Project's air quality emissions are dependent on the transportation assumptions, any underestimation of vehicular trips necessarily results in an underestimation of vehicular emissions.

**Response:** This comment raises the issue of induced growth. Please see Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-8, LAMP-AL00008-27, and LAMP-AL00008-29, regarding induced growth and the LAX Landside Access Modernization Program Project. The Draft EIR adequately addresses air quality impacts associated with the LAX Landside Access Modernization Program Project in Sections 4.2, Air Quality and Human Health Risk.

**LAMP-AL00008-73**

**Comment:** Finally, the DEIR also likely underestimates the Project's increase in criteria air pollutant emissions, because it may not have accounted for all of the vehicular travel to and from LAX. As we explained, the DEIR's GHG analysis does not include GHG emissions generated by vehicles traveling the full distance to and from LAX. Instead, the analysis only accounted for the GHG emissions from vehicular trips within a six-mile radius of the airport. Presumably, the DEIR's air quality analysis relied on the same assumptions as the GHG analysis. If so, the DEIR underestimates the Project's increase in VMT and therefore also underestimates the increase in criteria air pollution generated by these vehicular trips.

**Response:** This comment raises issues regarding the extent of the air quality impact analysis around the airport, and the use of a future environmental baseline that is not the typical existing conditions scenario. These issues have been addressed elsewhere in the comment responses. Please see

Response to Comment LAMP-AL00008-52 regarding the use of an approximate 6-mile radius for the impact analyses of GHGs, air quality, and health risk assessment around LAX. Please see Response to Comment LAMP-AL00008-57 regarding the use of a future environmental baseline.

The Draft EIR air quality impact analysis adequately addresses LAX Landside Access Modernization Program Project impacts in Section 4.2, Air Quality and Human Health Risk.

**LAMP-AL00008-74**

**Comment:** **XI. The DEIR's Description and Analysis of Potential Future Development, in Particular at the Continental City Site, Is Inadequate Under CEQA.**

The LAMP Project includes the potential for approximately 900,000 square feet of future commercial development of LAWA-owned parcels that would be freed up after subdivision and other land reconfiguration undertaken for new LAX ground transportation facilities. During construction, these parcels would be used for laydown and staging, at least through the first phase of the Project (2024). DEIR at 2-188; 2-191. Thereafter, the DEIR estimates that approximately 300,000 square feet would be used for office space, another 300,000 square feet would be used for hotel accommodation, 200,000 square feet would be used for commercial space, and the remaining 100,000 square feet would be used for a conference center. DEIR at 2-191.

The Project includes entitlements for development of these parcels consistent with the above uses, including proposed amendments to the LAX Plan and LAX Specific Plan necessary to accommodate development. *Id.*at 2-191 through 2-192. Such entitlements include two tract maps, lot line adjustments and "other minor subdivision actions" to reconfigure the parcels where Project components, including the two ITFs and the CONRAC, are proposed to be built. *Id.* at 2-201. The parcels identified for potential future development would be given a new subarea classification of "Airport Landside Support Subarea" under the proposed amendments to the LAX Plan and LAX Specific Plan.

The DEIR states that "additional CEQA project-level environmental review would be conducted, *as necessary*" once individual development projects are proposed on these parcels. DEIR 2-188 (emphasis added). Because these future development projects cannot proceed without the zoning changes associated with the Project, however, they are components of the LAMP Project. Thus the DEIR must describe and analyze these development projects in as much detail as is currently available, rather than postpone this analysis until individual development projects are proposed. Failure to do so amounts to project "segmentation" and is prohibited under CEQA.

Whether a lead agency prepares a "program" EIR or a "project specific" EIR under CEQA, the requirements for an adequate EIR remain the same. Guidelines §15160. "Designating an EIR as a program EIR also does not by itself decrease the level of analysis otherwise required in the EIR." *Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency* (2000) 82 Cal.App.4th 511, 533; see also Guidelines §15146 (degree of specificity required in program EIR varies not with "program" label, but rather with degree of specificity in underlying activity). Even a program-level EIR must contain "extensive detailed evaluations" of a plan's effects on the existing environment. *See Environmental Planning & Information Council v. County of El Dorado (1982) 131 Cal.App.3d 350, 358* ("*EPIC*"); *see also Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692,723-24 (where the record before an agency contains information relevant to environmental impacts, it is both reasonable and practical to include that information in an EIR).

**Response:** As noted on page 2-188 in Chapter 2, Description of the Proposed Project, of the Draft EIR, the proposed Project would require changes to the configuration and use of existing parcels

owned by LAWA where the new LAX ground transportation facilities are proposed to be constructed. Associated changes to the existing land use and zoning designations are proposed, as further discussed in Section 2.8 of the Draft EIR. These changes would create new parcels owned by LAWA that would be needed for construction laydown and staging areas during construction of the proposed Project until completion of Phase 1, but would be later available for future development following the construction period. The parcels proposed for future related development are located adjacent to the CONRAC, ITF East, APM MSF, and ITF West, and are shown on Figure 2-51 of the Draft EIR.

As discussed on page 2-188 of the Draft EIR, because LAWA has no specific plans for development of these parcels at this time, the potential for environmental effects from future development of these parcels was examined at a programmatic level in this EIR. Development of these areas would occur after construction of the proposed components of the Project. At such time as individual development projects are proposed on these parcels, additional CEQA project-level environmental review would be conducted, as necessary.

Contrary to the commentor's assertion, the Draft EIR identified potential uses and development of these parcels, as shown on page 2-191 of Chapter 2, Description of the Proposed Project, of the Draft EIR. LAWA assumed that these parcels would accommodate up to 900,000 sq. ft. of commercial development. Such future development is envisioned to support the needs of passengers, visitors, employees, and guests of hotels in the area. In the CONRAC area, the land located between W. 98th Street and W. Century Boulevard (Sites 7 and 8) and the land located on the corner of Aviation Boulevard and W. Arbor Vitae Street (Site 9) would be available after construction of the Project facilities is completed. For purposes of analysis, up to 450,000 sq. ft. of commercial development is projected in these areas. In addition, the areas located south of the ITF West along W. 98th Street (Sites 1 and 2) and along Airport Boulevard (Sites 3, 4 and 5) would be available for future development, as would portions of the Belford area located south of W. 96th Street (Site 6). For purposes of analysis, up to 450,000 sq. ft. of commercial development is projected in this area.

Land use designations (see Section 2.8 of the Draft EIR) and design guidelines (see Appendix B of the Draft EIR) have been developed to guide the future development of these parcels. Areas along W. Century Boulevard and Airport Boulevard would be developed consistent with commercial uses by providing services to meet the needs of Airport passengers and visitors, as well as guests of the nearby hotels on W. Century Boulevard. The portion of the Belford area south of W. 96th Street and the area between W. 96th Street and W. Arbor Vitae Street would be available to provide Airport-related support uses or commercial development. LAWA prepared an illustrative, conceptual plan for future development in consultation with local stakeholders and generated projections regarding the size and type of the potential future related development, as shown in Table 2-16 of the Draft EIR. As discussed on page 2-191 of the Draft EIR, other possible amenities could include: theaters; health and fitness centers; layover facilities; galleries or museums; or community uses.

As stated on page 4-4 in Chapter 4, Environmental Impact Analysis, of the Draft EIR, Section 15146(b) of the State CEQA Guidelines, states that an EIR prepared for program level entitlements, "need not be as detailed as an EIR on the specific construction projects that might follow." The State CEQA Guidelines incorporate the "rule of reason" and advise public agencies to avoid "speculative analysis of environmental consequences for future and unspecified development" that has not yet been formulated at greater levels of detail. (Discussion following CEQA Guidelines Section 15146.) Analyzing the impacts of potential future related development at a programmatic level of detail allows a lead agency to "consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." (State CEQA Guidelines Section 15168(b)(4).) If and

when future development is proposed within these parcels, those project-specific proposals will be evaluated as appropriate in compliance with CEQA.

Each section in Chapter 4 included both a project-level analysis of the LAX Landside Access Modernization Program and a program-level analysis of the LAX Landside Access Modernization Program Potential Future Related Development that described and analyzed the effects associated with the potential future related development based on the assumptions for development of these parcels, in compliance with CEQA.

Consistent with CEQA case law cited by the commentor, the level of detail for the Draft EIR's impact analysis for potential future related development corresponded closely with the specificity of current plans for future related development. As requested by the commentor, the Draft EIR does describe and analyze future related development projects in as much detail as is currently available.

**LAMP-AL00008-75**

**Comment:** Here, this analysis must include the full analysis of potential future development that is now missing, including, in particular, an explanation of the proposed temporary and long-term uses for the Continental City site located near El Segundo. While the DEIR states that the Continental City site is identified as a "Regional Center" in the General Plan,[20] and a solitary, unexplained exhibit to the DEIR appears to designate the majority of this site as a "Proposed Cargo Tenant Relocation Area" (DEIR Exhibit 2-46 at 2-157), the document reveals no specifics about LAWA's proposed future use for the site aside from stating it will be used for laydown during construction. The DEIR further violates CEQA by failing to state the "existing conditions" for the site, as required for an adequate analysis of the proposed Project's environmental impacts.

For example, the DEIR does not disclose that, under the approved 2004 Master Plan alternative (Alt. D), LAWA designated the Continental City site for development of an "Intermodal Transportation Center." Master Plan Final EIR at 3-81. Under that alternative, the site would have been developed to include 9,127 parking stalls and a link to the proposed Metro Green Line transit station. *Id.* In 2013, LAWA approved the SPAS preferred alternative, under which "Continental City is assumed to remain vacant unless/until another permanent land use is designated for the area separate from the SPAS." SPAS Final EIR at 4-565. The SPAS EIR identified possible future uses for the site as a relocated Airfield Bus Parking Area and Operations Building and/or Construction and Maintenance Division Facilities (*id.* at 2-13); the existing LAX Specific Plan would also permit various airport related commercial and operations uses, while prohibiting "aircraft under power" or residential use.

The DEIR must (a) give a complete an accurate description of the "existing conditions" at the site, under the applicable land use plans, (b) state any proposed future use (beyond construction laydown) for the site, whether as a "Cargo Tenant Relocation Area," or a use consistent with the specific and general plan designations, and (c) analyze the impacts of the propose change in use. CEQA requires that every EIR be detailed, complete, and reflect a good faith effort at full disclosure. CEQA Guidelines § 15151. The document should provide a sufficient degree of analysis to inform the public about the proposed project's adverse environmental impacts and to allow decisionmakers to make intelligent judgments. *Id.* Consistent with this requirement, the information regarding the project's impacts must be "painstakingly ferreted out." *EPIC*, 131 Ca1.App.3d at 357.

[20] The DEIR states that "Regional Center" means "focal point of regional commerce, identity, and activity that contains a diversity of uses," and "should

generally be developed at a density of 1.5:1 to 6.0:1 floor-area ratio ["FAR"] and to a height of 6 to 20 stories." DEIR at 4.8-15.

**Response:** The Continental City site, owned by LAWA and located at the northeast corner of Aviation Boulevard and Imperial Highway, is currently used for construction staging and laydown for ongoing LAX construction projects, and is proposed to be used for construction staging and laydown as part of the LAX Landside Access Modernization Program, as depicted on Figure 2-50 in Chapter 2, Description of the Proposed Project, of the Draft EIR.

Figure 2-46 of the Draft EIR, referenced by the commentor, is a figure showing potential relocation sites of the Delta Air Lines Office and Hangars, and depicts the area along Imperial Highway, including the Continental City site, as potential (not proposed) cargo tenant relocation areas. The statement from the SPAS Final EIR cited by the commentor continues to be accurate: "Continental City is assumed to remain vacant unless/until another permanent land use is designated for the area separate from the SPAS."

However, redevelopment of the Continental City site is not part of the LAX Landside Access Modernization Program, and thus, no assumptions concerning any future use beyond construction staging and laydown have been identified by LAWA. At such time that LAWA determines a potential use for Continental City beyond construction staging and laydown, LAWA will initiate the appropriate environmental review. Because there are no land use, zoning, or plan changes to the Continental City site, the EIR appropriately does not analyze any speculative future uses.

**LAMP-AL00008-76**

**Comment:** **XII. The DEIR Should Include Analysis of a "Constrained Growth" Alternative.**

As we recommended in our comments on the NEPA Scoping Document, because a legally adequate analysis of the impacts of induced growth caused by the Project would show noise, air quality and climate change impacts far above levels considered acceptable, LAWA should analyze a constrained growth alternative whereby the proposed Project would accommodate passenger levels up to some number at or below 82.9 MAP, the low end of the range forecast for LAX in the 2040 RTP/SCS. The DEIR responds to this recommendation by claiming that such an alternative would be infeasible because it would violate the Airport Noise and Capacity Act of 1990 ("ANCA"). DEIR at 5-19 through 5-20. This is a mischaracterization of ANCA. While ANCA and prior federal aviation law prohibit unreasonable, arbitrary or discriminatory constraints on access to airports, such laws do not require airport operators such as LAWA to *build* access-improvement projects or other projects to expand capacity. Once LAWA revises the DEIR consistent with the comments in this letter, thereby providing the legally required disclosure of environmental impacts associated with the Project, it will become clear that the Project would have substantially greater environmental impacts (particularly to air quality, climate change and noise) than the DEIR currently anticipates. To address this, LAWA should evaluate a "constrained capacity" (or more modest growth) alternative that would not constrain present operations but nonetheless would result in less growth (and thus fewer overall, and less significant impacts) than the proposed Project.

**Response:** As the commentor notes, the Draft EIR addresses a constrained growth alternative and concludes it is infeasible in Chapter 5, Alternatives, Section 5.4.1.1.4. The Draft EIR analyzes future traffic conditions with future passenger activity levels consistent with the Federal Aviation Administration's Terminal Area Forecast (TAF) and the Southern California Association of Government's (SCAG) RTP/SCS forecasts for LAX. As noted in Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-7, and LAMP-AL00008-8 and as

discussed on page 6-8 in Section 6.3.2 of the Draft EIR, growth in passengers would occur with or without the proposed Project. The proposed Project would not induce more passengers to use LAX because the proposed Project does not include any improvements to core passenger processors (e.g., terminals and gates) or to the airfield facilities. Thus, any alternative to constrain capacity would require steps that would reduce passenger enplanements and aircraft operations from what would occur without the Project.

The comment asserts that federal aviation law does not require airport operators such as LAWA to build access-improvement projects or other projects to "expand capacity." However, this statement is not relevant to the feasibility of a reduced growth alternative because the proposed Project, while it would improve access, would not directly or indirectly "expand capacity." See responses to comments mentioned in the previous paragraph.

Due to federal grant obligations and federal law, LAWA does not have the authority without FAA approval to restrict airline operations or force airlines to operate at other airports, which FAA has not granted any airport since 1990.[1] Similarly, LAWA cannot make changes to the Airport that would restrict its existing capacity or affect access without approval from the FAA.[2] The Airline Deregulation Act of 1978 (P.L. 95-504) removed federal, state and local control over airfares, flight schedules, routes, and entry and exit of commercial airlines. Because LAWA cannot legally constrain air passenger growth, a constrained growth alternative is not feasible. See also Responses to Comments LAMP-AL00008-2 and LAMP-AL00008-4.

[1] See Airport Noise and Capacity Act of 1990, 49 U.S.C. §§ 47521-33 and 14 C.F.R. Part 161, Available: https://www.faa.gov/airports/environmental/airport_noise/. *See also*, 49 U.S.C. § 47101(a)(1) (airport to be made available for public use), Available: https://www.gpo.gov/fdsys/pkg/USCODE-2009-title49/pdf/USCODE-2009-title49-subtitleVII-partB-chap471-subchapI-sec47101.pdf.

[2] See 49 U.S.C. § 47107(a)(16), Available: https://www.gpo.gov/fdsys/pkg/USCODE-2011-title49/pdf/USCODE-2011-title49-subtitleVII-partB-chap471-subchapI-sec47107.pdf.

**LAMP-AL00008-77**

**Comment:** **XIII. The DEIR Must Adequately Describe and Address the Impacts of Construction Haul Routes and Staging for the Project.**

The DEIR indicates that laydown for construction will occur at the Continental City site, just north of El Segundo's border. Roughly one-third of Imperial Highway along the border with El Segundo is proposed to be used as a construction haul route. The impacts from both of these construction-related uses must be adequately analyzed in the DEIR. Presently, the DEIR does not indicate how long the Continental City site would be used for laydown, or disclose any site-specific impacts related to this use, including impacts from noise or truck-traffic ingress and egress.

**Response:** The Continental City site is currently used for construction staging and laydown for ongoing LAX construction projects, and is proposed to be used for construction staging and laydown as part of the LAX Landside Access Modernization Program, as depicted on Figure 2-50 in Chapter 2, Description of the Proposed Project, of the Draft EIR. The Continental City site will be utilized for construction staging and laydown for the foreseeable future.

Section 4.12.3, Construction Surface Transportation, of the Draft EIR identifies the Continental City site as a construction staging and laydown area for the LAX Landside Access Modernization

Program and it does assess the effects of construction traffic using that site. The Continental City site is located in an industrial area underneath I-105 and adjacent to Imperial Highway and Aviation Boulevard. There are no noise-sensitive receptors located in close proximity to the Continental City site; noise from trucks entering and exiting the site would not exceed ambient noise conditions. The impacts associated with utilizing this staging site have been analyzed in the individual resources sections in Chapter 4 of the Draft EIR. The commentor provides no details on any specific impact they believe was not properly assessed, therefore no further response is possible.

**LAMP-AL00008-78**

**Comment:** The DEIR's noise analysis also omits any analysis of noise impacts from use of Imperial Highway as a truck haul route. Indeed, the noise measurement locations identified in the noise analysis, used to establish the environmental baseline for construction noise, do not include any locations on the border with El Segundo, despite the fact that hauling and laydown will occur immediately adjacent to the City. DEIR Figure 4.9.3-1 at 4.9-29.

**Response:** As discussed in Section 4.9.3.2 of the Draft EIR, ambient noise measurements were undertaken to establish existing noise levels at various locations in proximity to construction activity associated with the proposed Project. Noise measurement locations represent the noise-sensitive receptors that would most likely be affected by construction noise.

As noted on page 4.9-7 of the Draft EIR: "10 intersections were identified *as geographically representative of regional locations that may experience increased traffic volumes attributable to the proposed Project*." (Emphasis added.) Contrary to the allegations in the comment, 2 receptor locations RT7 and RT10 are on the border of El Segundo, as shown in Figure 4.9.2-1 of the Draft EIR. As shown in Table 4.9.2-3 of the Draft EIR, existing ambient noise levels were 74.9 dB(A) at RT7 and 74.7 dB(A) at RT10. Figure 4.9.2-2 of the Draft EIR also includes locations 67, 97, and 125 at the border of El Segundo. However, as shown in Figure 2-50 of the Draft EIR, the proposed haul routes utilize Imperial Highway and do not go further west than Sepulveda Boulevard.

While there would be some construction trips that pass-by a small area of residences located east of the City of El Segundo (east of Avalon Blvd), these impacts would not be significant. A doubling of sound energy results in a 3 dB(A) increase, which means that a doubling of sound wave energy (e.g., doubling the volume of traffic on a roadway) would result in a barely perceptible change in sound level. (See Draft EIR page 4.9-41). Given these haul routes would be traveling along freeways and major arterials, such as Imperial Highway, that already are high-volume routes, relatively small increases in construction traffic would not double or triple the existing traffic volumes along these routes. As identified in Table 4.12.3-4 in Section 4.12.3, Construction Surface Transportation, of the Draft EIR, during the peak hour during the peak month of construction, there would be 162 trucks utilizing all haul routes identified for the proposed Project. As identified on Figure 4.12.3-3 in Section 4.12.3 of the Draft EIR, approximately 32 percent of those 162 truck trips (or 52 trips) would occur on I-105 and 5 percent of those 162 truck trips (or 8 trips) would occur on Imperial Highway. As indicated on page 15 in Appendix P, Construction Traffic, intersection volumes at Imperial Highway and Aviation Boulevard (westbound on Imperial Highway turning right on Aviation) is 799 during the a.m. peak hour. Thus, construction truck trips associated with the proposed Project would represent 7.5 percent of the total vehicles turning at this intersection during the morning peak hour (60 of 799 total vehicles). As such, impacts related to construction traffic noise would be less than significant at these other receptor locations east of El Segundo because noise increases would be less than 3 dB(A) Leq(h).

**LAMP-AL00008-79**

**Comment:** Considering El Segundo's longstanding concerns related to noise and traffic impacts generated by uses at the airport's southern edge, the City urges that the proposed construction staging be located away from El Segundo. At the very least, the City expects all potential impacts from construction staging, and truck hauling, to be thoroughly analyzed and mitigated in the DEIR.

**Response:** The Continental City site is currently used for construction staging and laydown for ongoing LAX construction projects, and is proposed to be used for construction staging and laydown as part of the LAX Landside Access Modernization Program, as depicted on Figure 2-50 in Chapter 2, Description of the Proposed Project, of the Draft EIR.

Section 4.12.3, Construction Surface Transportation, of the Draft EIR identifies the Continental City site as a construction staging and laydown area for the LAX Landside Access Modernization Program and it does assess the effects of construction traffic using that site. The Continental City site is located in an industrial area underneath I-105 and adjacent to Imperial Highway and Aviation Boulevard. There are no noise-sensitive receptors located in close proximity to the Continental City site; noise from trucks entering and exiting the site would not exceed ambient noise conditions.

The mitigation measures identified in Section 4.12.3.8 of the Draft EIR address construction traffic impacts. Additionally, Mitigation Measure LAX-AQ-1, Construction-Related Air Quality Control Measures, identified in Section 4.2.1.7 of the Draft EIR would reduce construction-related air pollutant emissions.

**LAMP-AL00008-80**

**Comment:** The City also repeats its longstanding request that LAWA include pavement reconstruction on Imperial Highway as a mitigation measure.

**Response:** It is not the pupose of CEQA to fix existing environmental problems. (See *Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"].) However, LAWA will continue to consult with the agencies responsible for maintenance of these roadways to identify any issues during construction with the condition of the haul routes. As noted in Response to Comment LAMP-AL00008-78, truck trips associated with the proposed Project during the peak hour of the peak month of construction represent 7.5 percent of the total trips on westbound Imperial Highway turning northbound on Aviation Boulevard, the designated haul route for the proposed Project.

**LAMP-AL00008-81**

**Comment:** **XIV. Conclusion**

In sum, LAWA should take no action to approve the Project until it has addressed the significant deficiencies in the DEIR and the recommendations discussed in this letter. It should also remove from the LAMP those unrelated, unnecessary and problematic elements identified in this letter.

**Response:** Please see Responses to Comments LAMP-AL00008-2 through LAMP-AL00008-80 above regarding the adequacy of the analysis in the LAX Landside Access Modernization Program Draft EIR.

**LAMP-AL00008-81a**

**Comment:** List of Exhibits (*due to combined size of exhibits, all exhibits are provided on the enclosed CD, unless otherwise indicated*)

A LAX Master Plan

B LAX Master Plan EIR

C LAX Specific Plan Amendment Study ("SPAS") Report

D SPAS EIR

E LAX Specific Plan

F LAX Midfield Satellite Concourse North Project EIR

G Memorandum by Adib Kanafani, Ph.D., N.A.E. (*attached hereto*)

H Eno Center for Transportation, "Addressing Future Capacity Needs in the U.S. Aviation System," Nov. 2013

I Southern California Association of Governments 2040 RTP/SCS, Aviation & Airport Ground Access Appendix

J LAX Terminals 2 & 3 Project Notice of Preparation of an EIR and Initial Study

K Alliance for a Regional Solution to Airport Congestion (ARSAC) and LAWA Memorandum of Understanding

L FAA Advisory Circular 150/5070-6B

M 2014 Annual Progress Report, LAX Master Plan Mitigation Monitoring & Reporting Program

N LAX Final Noise Exposure Map Report (August 2015)

O LAX Master Plan Addendum

P *In the Matter of Noise Variance Application for City of Los Angeles et al.,* Dept. of Transp. Case No. L2010041216

Q LAX Aircraft Noise Abatement Operating Procedures and Restrictions (Sept.2010)

R Trip Advisor Webpage, *available at* https://www.tripadvisor.com/Travel-g32655-c160004/Los-Angeles:California:Bob.Hope.Airport.Aka.Burbank.Airport.html (last visited November 15, 2016)

S FlyerTalk Webpage, *available at* http://www.flyertalk.com/forum/southwestairlines-rapid-rewards/1558208-flying-into-burbank-vs-lax-worth-hasslechanging-planes-phx-2.html (last visited November 15, 2016)

T Surface Transportation Policy Project, *Build It and They'll Come*

U California Air Resources Control Board, "Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions," Sept. 30, 2014.

V McCahill et al., "Effects of Parking Provision on Automobile Use in Cities–Inferring Causality," November 2015.

W City of Los Angeles Office of the Controller, "Industrial, Economic, &Administrative Survey Report of Los Angeles World Airports," Feb. 2016.

X U.S. EPA Transportation and Climate Website (last visited November 15, 2016)

Y Center for Biological Diversity, "Up In the Air—How Airplane Carbon Pollution Jeopardizes Global Climate Goals," December 2015

Z San Diego Association of Governments 2015 RTP/SCS EIR (excerpt)

AA Hillary Marshall, "We Must Prioritize Smarter Transit Options to and from Airports," *Huffington Post* (June 27, 2016)

BB "Over 190 Countries Adopt Plan to Offset Air Travel Emissions," T*he New York Times* (October 6, 2016)

CC Governor's Office of Planning and Research, Technical Advisory, "CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review," 2008.

**Response:** Photocopies of Exhibits E, G through L, and O through CC provided on the CD enclosed with the November 15, 2016 comment letter from Shute, Mihaly & Weinberger LLP are provided in Attachment 1 (Original Comment Letters on the Draft EIR) of this Final EIR. Due to the large file sizes of Exhibits A through D, F, M and N (ranging from over 400 pages to many thousands of pages), and given LAWA's commitment to sustainability, Exhibits A through D, F, M, and N are not included in Attachment 1 of this Final EIR. Exhibits A through D, F, M, and N listed above are all LAWA documents and are available for review at LAWA Environmental Programs Group, One World Way, Room 218, Los Angeles California, 90045, or on LAWA's website as follows:

http://www.lawa.org/ourLAX/Pastprojects.aspx?id=8844

- Exhibit A - LAX Master Plan
- Exhibit B - LAX Master Plan EIR

http://www.lawa.org/LAXSPAS/Reports.aspx

- Exhibit C - LAX Specific Plan Amendment Study ("SPAS") Report
- Exhibit D - SPAS EIR

http://www.lawa.org/MSCNorth/projectdocuments.aspx

- Exhibit F - LAX Midfield Satellite Concourse North Project EIR

http://www.lawa.org/ourLAX/AnnualReports.aspx?id=8067

- Exhibit M - 2014 Annual Progress Report, LAX Master Plan Mitigation Monitoring & Reporting Program

http://lawa.org/LAXPart150.aspx?id=9625

- Exhibit N - LAX Final Noise Exposure Map Report (August 2015)

**LAMP-AL00008-82**

**Comment:** **Comments on the Draft Environmental Impact Report (DEIR) of the LAX Landside Access Modernization Program (LAMP)**

**Traffic Growth and Capacity Issues**

The DEIR for the LAX Landside Access Modernization Program (LAMP) fails to adequately assess the growth impacts of the program on aviation activity levels, including air passengers, flight operations, and ground access traffic, and to provide mitigation measures for such growth. It assumes that the growth in aviation activity is unaffected by the program and that the same levels of activity will materialize regardless of whether the program is implemented or not. The DEIR states that airport access constraints do not affect aviation activity.

**1. Capacity Issues**: The airport is a group of components operating in sequence to accommodate traffic/passenger flow (access system-terminals-gates-airfield-airspace). Each of these components is a link in a chain and has a capacity. The lowest capacity of these links constrains flow and determines the capacity of the whole system. This was recognized by the LAX 2004 Master plan which stated: "The most constraining component defines the capacity of the entire airport". The 2004 master plan considered an unconstrained demand forecast of 98 MAP in 2015 and evaluated four alternative configurations and estimated the airport capacity for each using the principle that this capacity is constrained by that of the lowest capacity component. The four alternatives considered were:

a. No Action No Project:
    i. Capacity of 78 MAP
    ii. constrained by the Curb and Roadways.
b. Alternative A &B including 5th runway, increased gates, and Landside Improvement (LAMP):
    i. Capacity 97.9 MAP
    ii. constrained by 5-runway airfield.
c. Alternative C including increased gates and LAMP improvements, but only 4 runways:
    i. Capacity 89.6 MAP
    ii. constrained by 4-runway airfield.
d. Alternative D including LAMP improvements and limited to 153 gates:
    i. Capacity 78 MAP
    ii. constrained by gates as well as curb and roadways.

The DEIR therefore contradicts the 2004 Master Plan which recognizes the fact that the curb and roadway (access system) can constrain airport capacity and consequently hinder growth, and that

LAMP improvements will relieve this constraint and permit aviation activity to grow toward the capacity constrained by the next barrier to growth.

As shown in section 4.12.2-5 the ground traffic analysis contained in the DEIR is based on aviation activity levels of 86 MAP in 2024 and 95 MAP in 2035. These levels of activity could not be accommodated with the access system in its existing condition with its capacity of 78 MAP as determined in the Master Plan.[1]

[1] For further information, please refer to "Addressing Future Capacity Needs in the U.S. Aviation System " report by Eno Center for Transportation (November 2013) (https://www.ustravel.org/sites/default/files/Media%20Root/USTravel_Eno_1.pdf ), which states: "Ground access to the airport at LAX is the most significant chokehold in the airport's system and according to Los Angeles World Airports (LAWA) airport access infrastructure was projected to hit complete gridlock at 78.9 million annual passengers without improvements to the system. While 78.9 million annual passengers is a precise number [sic], it is accurate enough to mean that adding about 15 million annual passengers above the 62.6 million in 2012 will be too much for the access and gate infrastructure to handle."

**Response:** The first paragraph of this comment includes introductory statements that are further analyzed in the remainder of the report prepared by Mr. Adib Kanafani (which is provided as Exhibit G of the comment letter submitted by Shute, Mihaly & Weinberger, LLP on behalf of the City of El Segundo). See Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-7, and LAMP-AL00008-8 for a discussion of the capacity constraints analyzed in the LAX Master Plan and projected growth in activity levels as it relates to the proposed LAX Landside Access Modernization Program improvements.

In Footnote 1 of this comment, the commentor references a report which asserts that "[g]round access to the airport at LAX is the most significant chokehold in the airport's system and according to Los Angeles World Airports (LAWA) airport access infrastructure was projected to hit complete gridlock at 78.9 million annual passengers without improvements to the system." Upon further review, this citation appears on page 18 of the report published by the Eno Center for Transportation.[1] This statement is made based on another source (Footnote 102 of the report) which reads "Ricondo & Associates. (July 2012), LAX Specific Plan Amendment Study Report, Page 13." This Ricondo & Associates' report is Appendix F-1 of the Preliminary LAX Specific Plan Amendment Study Report.[2] However, it must be noted that Appendix F-1 does not discuss "significant chokehold" or "complete gridlock" anywhere. Page 13 of Appendix F-1 presents Figure 1 entitled "LAX Passenger Forecast Results and Comparison to Other Aviation Forecasts". It is clear that the authors of the Eno Report have therefore drawn their own conclusions as opposed to citing specific conclusions discussed in Appendix F-1, and in the process, published an inaccurate statement.

[1] Eno Center for Transportation, Addressing Future Capacity Needs in the U.S. Aviation System, November 2013, p. 18.

[2] City of Los Angeles, Los Angeles World Airports, Preliminary LAX Specific Plan Amendment Study Report, July 2012.

**LAMP-AL00008-83**

**Comment:** **2. Demand Forecasting Issus**: In section 6.3.2 the DEIR maintains that the demands forecast will materialize with or without the proposed project. It quotes the FAA 2014 Terminal Area Forecasts as based on local and national economic conditions "independent of the ability of the

airport and air traffic control system to furnish the capacity required to meet the demand". As such the DEIR fails to recognize the difference between "demand" and actual "aviation activity level", and makes an assumption that permits activity levels to exceed available capacities. It is clear that forecast demand levels will not materialize if the capacity is not provided to accommodate them. The DEIR further quotes the FAA as saying that "…existing constraints are "embedded in historical data" used by the FAA as a base for the forecast" and makes the wrong conclusion that there is "no correlation between activity level and existing conditions of the CTA". Existing conditions are reflected in historic data which show activity levels resulting from the interaction of demand and supply, and when the supply is limited the activity level cannot exceed that limit. Historic passenger traffic data at LAX did not, and could not reach beyond the 78 MAP capacity of the curb and roadway system, even if economic conditions created the "demand".

The LAX Master Plan of 2004, while working in the face of 98 MAP forecast recognized that passenger traffic levels could not exceed 78 MAP unless LAMP improvements were made to release that constraint on capacity. The DEIR does not recognize this and implicitly assumes that activity levels up to the airfield capacity constrain will materialize far exceeding the stated capacity of the curb and roadway system. Such growth cannot occur unless the curb and roadway constraint is removed by the implementation of LAMP.

**Response:** Please see Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, and LAMP-AL00008-8 for a discussion of capacity constraints analyzed in the LAX Master Plan and projected growth in activity levels as it relates to the proposed Project improvements.

The commentor claims that "[i]t is clear that forecast demand levels will not materialize if the capacity is not provided to accommodate them," and further reiterates that "[h]istoric passenger traffic data at LAX did not, and could not reach beyond the 78 MAP capacity of the curb and roadway system, even if economic conditions created the "demand." See Response to Comment LAMP-AL00008-2 for a discussion of the numbers of passengers at LAX in 2016 and a discussion of the concept of practical capacity.

Analyzing historical data provides empirical evidence on how passenger activity levels may have evolved in concert with recorded heavy traffic congestion conditions in the Central Terminal Area (CTA) and areas near LAX.

Passengers at LAX grew at a 2.5 percent CAGR over the period of 2005 to 2016.[1] Such growth over an 11-year period is similar to that assumed in the 2014 TAF at 2.1 percent CAGR between 2014 and 2040. As discussed on page 6-7 in Section 6.3.2 of the Draft EIR, the period 2005 to 2015 included six consecutive years of sustained high growth with a seventh year added based on the recently released 2016 passenger counts, as discussed in Response to Comment LAMP-AL00008-2. Therefore, growth recorded over the last seven years at and around LAX is empirical evidence based on historical data that passenger activity levels can and have increased despite increased traffic congestion conditions at LAX. As shown in Table 4.12.1-7 and discussed on page 4.12-20 of Section 4.12.1, On-Airport Transportation, of the Draft EIR, over half of the CTA roadways operated at LOS E or F at certain times of the day in 2014.

Table 1 below provides a list of historical passenger market shares for commercial passenger airports in the Los Angeles basin over the last ten years.[2] Whereas LAX's passenger market share has increased, the other airports have seen their market shares stay relatively constant (John Wayne Airport and Long Beach Airport) or decline (Ontario International Airport and Hollywood Burbank Airport) over the 10-year period. Historical trends do not suggest that heavy traffic congestion at and around LAX has forced passengers to use other airports in the region. Such analysis provides substantial evidence to support the conclusion that Airport roadway

congestion has not been an obstacle to passenger growth at LAX, as discussed on page 6-7 in Section 6.3.2 of the Draft EIR.

**Table 1**

**Historical Passenger Market Shares between 2005 and 2015**

| Calendar Year | Hollywood Burbank Airport (BUR) | Los Angeles International Airport (LAX) | Long Beach Airport (LGB) | Ontario International Airport (ONT) | John Wayne Airport (SNA) |
|---|---|---|---|---|---|
| 2005 | 7% | 70% | 3% | 8% | 11% |
| 2006 | 7% | 71% | 3% | 8% | 11% |
| 2007 | 7% | 70% | 3% | 8% | 11% |
| 2008 | 7% | 72% | 3% | 7% | 11% |
| 2009 | 6% | 73% | 4% | 6% | 11% |
| 2010 | 6% | 74% | 4% | 6% | 11% |
| 2011 | 5% | 75% | 4% | 6% | 10% |
| 2012 | 5% | 76% | 4% | 5% | 10% |
| 2013 | 5% | 77% | 3% | 5% | 11% |
| 2014 | 4% | 78% | 3% | 5% | 10% |
| 2015 | 4% | 78% | 3% | 4% | 11% |

Source: Ricondo & Associates, Inc., December 2016, based on U.S. Department of Transportation T-100 data obtained from Innovata (historical passenger activity levels and calculated market shares).

[1] City of Los Angeles, Los Angeles World Airports, Statistics - Ten Year Summary – Passengers, Available: http://www.lawa.org/welcome_LAX.aspx?id=800, accessed January 26, 2017.

[2] To date, only Los Angeles International Airport and Ontario International Airport have released 2016 passenger counts. Therefore Table 1 could not be updated to reflect 2016 historical market shares.

**LAMP-AL00008-84**

**Comment:** **3. Airport Market Share Issues**: The Los Angeles metropolitan area is served by a number of airports. In a multi-airport region passengers have a choice among airports. This choice has been the subject of many studies that are well documented in the literature. The ACRP report 98, which is quoted in the DEIR, provides a good summary of the findings on this subject. It identifies the primary drivers of airport choice in a multi-airport market such as: the price, air service quality, airline/alliance loyalty, and airport ground access. It recognizes airport accessibility as the extent to which passengers can get to the airport from their residence or place of business. This is usually measured by the access time. Numerous studies quoted here and elsewhere recognize the importance of time as a variable affecting airport choice.

LAX remains the primary airport serving the region because of its other service advantages: nonstop flights to more destinations, international connections, wider choice of airlines, etc. But the fact remains that access constraints will affect the airport's share of the market. The ACRP 98 report, concludes based on a the Los Angeles regional case study that[2]:

> "Surface access issues across most of the regional – Passenger commute *times remains a primary passenger choice driver in the Los Angeles Basin. Given the presence of several regional facilities across the area, the traffic situation in the Basin drives the airport choice for a large proportion of travelers".*

To the extent that LAMP improvements will relieve congestion in the CTA and improve travel time for passengers accessing or leaving the LAX terminal area, it will improve LAX's attractiveness relative to other airports in the region and will expand its market shed area. This has been shown to be true repeatedly in airport choice models that have consistently found significant effects of travel time as a factor in airport choice.

Another factor that has been shown to affect passenger airport and mode choice is the travel time reliability. Improving reliability is tantamount to reducing travel time because passengers will need to allow for shorter margins to avoid missing flights. The LAMP improvements will improve reliability by providing regular APM access to the CTA thereby reducing the fluctuations in travel time that arise when congestion is severe.

The DEIR simply dismisses all this by stating that the other factors such as air service quality, flight schedules, price, and loyalty program are the primary factors affecting passenger choice, and that therefore the LAMP improvements will not increase the market share of LAX.

[2] Parella, B.C. et. al. "Understanding Airline and Passenger Choice in Multi-Airport Regions", Acviation Cooperative Research Program ACRP 98. Transportation Research Board. Washington, D.C., 2013. *https://www.nap.edu/download/22443*.

**Response:** As it relates to airport market shares, please see Response to Comment LAMP-AL00008-83, which includes an analysis of passenger market shares of the commercial passenger airports in the Los Angeles basin over the last 10 years. Responses to Comments LAMP-AL00008-2 and LAMP-AL00008-8 further discuss the various factors influencing passengers' choices and airline business decisions, and how it was concluded that traffic congestion is not a barrier to passenger growth at LAX.

**LAMP-AL00008-85**

**Comment: Summary**

The DEIR of the LAMP program incorrectly ignores the aviation activity growth effects of the project. It incorrectly ignores the fact that capacity constraints at the curb/roadway access system will limit airport activity, which cannot grow towards the forecast demand level without the improvements in the access system. LAMP improvements are designed to accommodate activity levels of 86 MAP in 2024 and 95 MAP in 2035, levels that clearly could not be accommodated with the current access system with its 78 MAP capacity.

Furthermore, the DEIR ignores the potential effect of the LAMP improvements on LAX's accessibility attractiveness relative to the other airports in the region and the resulting increase in its share of the regional market.

**Response:** This comment provides a summary of the commentor's findings and assertions, all of which have been addressed in Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-8, and LAMP-AL00008-82 through LAMP-AL00008-84 above.

**LAMP-AL00008-86**

**Comment: Recommendation**

The DEIR should include a thorough and comprehensive aviation activity modeling analysis to quantify the effect of the LAMP improvements on activity considering regional demand and airport market share. The analysis should evaluate how the reduction in access time and the improvement of access time reliability will improve LAX's accessibility relative to the other airports in the Los Angeles Basin and how that will affect its market share of the total travel demand in the Basin. The aviation activity modeling analysis should also show what effect LAMP will have on passengers' mode choice to LAX and the extent if any to which LAMP will increase public transportation access to the airport. Only with such a thorough and comprehensive analysis would it be possible to assess the aviation activity and environmental impacts of LAMP.

**Response:** This comment provides a list of recommendations presented below.

- Thorough and comprehensive aviation activity modeling analysis to quantify the effect of the LAMP improvements on activity considering regional demand and airport market share. As discussed in Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, and LAMP-AL00008-8, the forecasted passenger and operation activity levels assumed in the Draft EIR (i.e., the 2014 FAA TAF) do reflect reasonable growth over the proposed Project timeframe, similar to that experienced over the last ten years, up to 95 MAP in 2035. The Draft EIR methodologies and analysis approaches used to predict passenger growth with and without the proposed Project, including use of accepted FAA and SCAG passenger growth forecasts, are reasonable and supported by substantial evidence. CEQA does not require that a lead agency perform all recommended research in evaluating a project's environmental impacts. Society for Cal. Archaeology v. County of Butte (1976) 65 Cal.App. 3d 832.
- The analysis should evaluate how the reduction in access time and the improvement of access time reliability will improve LAX's accessibility relative to the other airports in the Los Angeles Basin and how that will affect its market share of the total travel demand in the Basin. As discussed in Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-8, and LAMP-AL00008-83, historical passenger trends do not suggest that heavy traffic congestion at LAX has forced passengers to use other airports in the region.
- The aviation activity modeling analysis should also show what effect LAMP will have on passengers' mode choice to LAX and the extent if any to which LAMP will increase public transportation access to the airport. Transit ridership assumptions for LAX, were provided by Metro, which included projected ridership for the Metro LAX/Crenshaw transit line currently under construction. LAWA conservatively assumed that if the LAX Landside Access Modernization Program was implemented, transit ridership would quadruple, if an Automated People Mover (APM) system was constructed and a station connected to the Metro's Airport Metro Connector (AMC) 96th Street Transit Station was built. However, the number of transit riders assumed is less than 4 percent, which was based on coordination and input with Metro. For further information on transit ridership assumptions, see Response to Comment LAMP-AL00008-67.

**LAMP-AL00009 Holloway, Charles C. Los Angeles Department of Water and Power 11/15/2016**

**LAMP-AL00009-1**

**Comment:** The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review and provide comments on the Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Landside Access Modernization Program (LAMP). LADWP maintains a number of critical water facilities within the limits of the proposed LAMP Project. As acknowledged in the DEIR, the LAMP Project will have impacts to existing water distribution lines and will require continued coordination between Los Angeles World Airports (LAWA) and LADWP regarding the relocation and installation of these water facilities in order to provide adequate water supply to the LAMP Project and comply with the City of Los Angeles' water sustainability goals. However, in reviewing the LAWA LAMP proposed project description, LADWP notes the omission of the planned replacement of the existing 36-inch trunk line on Century Boulevard. This trunk line is a critical part of the LADWP Water System that provides reliable water supply to LAX.

Due to its age and history, the Century Boulevard Trunk Line Project has been added to LADWP's 10-year Capital Improvement Program. The Century Blvd Trunk Line Project consists of replacing approximately three miles of the existing 36-inch diameter welded steel trunk line on Century Boulevard between Sepulveda Boulevard and Prairie Avenue. The most critical portion is approximately 5,600 feet located between Sepulveda Boulevard and Aviation Boulevard, which has a history of leaks and repairs. The new water line will be 48 inches in diameter and will increase operational flexibility to serve the LAX area. Depending on the final route, the total project length could be up to 3.5 miles, of which approximately 1.5 miles would be in the City of Inglewood.

Coordination between LADWP and the LAX LAMP Project Teams is critical to determine the most appropriate alignment that minimizes impacts to the area. LADWP requests that a separate monthly coordination meeting be established between both parties to ensure the success of both projects.

LADWP respectfully requests that the Century Boulevard Trunk Line Project be included in the environmental review of the LAX LAMP Project. For questions or concerns specific to the Century Boulevard Trunk Line Project and proposed coordination meetings, please contact Ms. Annette Flores from our Water Engineering & Technical Services Division at (213) 367-0827 or at Annette.Fiores@ladwp.com. For matters regarding the CEQA approach, please contact Mr. Christopher Lopez of my staff at (213) 367-3509 or at Christopher.Lopez@ladwp.com.

Thank you again, for this opportunity to review and comment on the Draft Environmental Impact Report for the LAX Landside Access Modernization Program.

**Response:** As described by the commentor, the Century Boulevard Trunk Line Project is an LADWP project included in its 10-year Capital Improvement Program. Replacement of this water line is not a part of the proposed LAX Landside Access Modernization Program, is proposed by another agency, and has independent utility from the proposed Project. Therefore, impacts associated with the trunk line replacement were not analyzed in the Draft EIR and are not analyzed in the Final EIR as a proposed Project component.

LAWA understands that the Century Boulevard Trunk Line Project would consist of replacing approximately 3 miles of the existing 36-inch diameter welded steel trunk line on Century

Boulevard between Sepulveda Boulevard and Prairie Avenue, with a 48-inch diameter line. LAWA attended a meeting with LADWP on October 20, 2016 to discuss the Century Boulevard Trunk Line Project and the LAX Landside Access Modernization Program. At that time, LADWP was considering several alternative alignments for the Century Boulevard Trunk Line Project. LAWA committed to closely coordinating with LADWP in the planning for both projects to ensure that construction conflicts would be minimized. LAWA will continue to coordinate with LADWP to minimize disruptions to operations in the area during construction of the replacement line.

## LAMP-AL00010 Atwell, Louis A. City of Inglewood 11/15/2016

**LAMP-AL00010-1**

**Comment:** The City of Inglewood appreciates working with LAWA during the EIR process. However, the Project has significant traffic impacts in the City of Inglewood. The Project significantly increases traffic on Century Boulevard, Manchester Boulevard, Arbor Vitae Street, Imperial Highway, Crenshaw Boulevard, Prairie Avenue and La Brea Avenue.

**Response**: The Draft EIR results for City of Inglewood intersections are as follows. The results of the off-airport traffic impacts analysis on Study Area intersections are provided in Section 4.12.2.7 of the Draft EIR. As discussed in Section 4.12.2.7.1 and shown in Table 4.12.2-18 and Figures 4.12.2-4 and 4.12.2-5, under the 2024 Future With Project scenario, significant (and cumulatively considerable) impacts would occur at one intersection during the a.m. peak hour; at four intersections during the p.m. peak hour; and at one intersection during both the a.m. and p.m. peak hour, as follows:

- Airport Boulevard and Century Boulevard. Significant impact in the p.m. peak hour at LOS D
- Aviation Boulevard and Arbor Vitae Street. Significant impact in the p.m. peak hour at LOS D
- La Cienega Boulevard and Florence Avenue. Significant impact in the p.m. peak hour at LOS F
- La Cienega Boulevard and Arbor Vitae Street. Significant impact in the a.m. peak hour at LOS F
- La Cienega Boulevard and Century Boulevard. Significant impact in the a.m. peak hour at LOS E and in the p.m. peak hour at LOS F
- Inglewood Avenue and Century Boulevard. Significant impact in the p.m. peak hour at LOS F

Two intersections would be significantly impacted during the mid-day peak hour, as follows:

- Airport Boulevard and Century Boulevard. Significant impact in MD Peak Hour at LOS D
- Aviation Boulevard and Arbor Vitae Street. Significant impact in MD Peak Hour at LOS C

The proposed Project would not result in significant traffic impacts at the remaining 177 of the 183 study intersections during either the a.m. or p.m. peak hour, or the remaining 34 of the 36 study intersections for the midday peak hour. The intersection analysis shows that the system-wide operations within the Study Area during the morning and evening peak hours did not change appreciably compared to the Without Project conditions. During the evening peak hour, it is worth noting that intersection operations at 43 of the 55 locations (78 percent) within the area of influence were improved compared to the 2024 Future Without Project conditions. In particular, as shown on Figure 4.12.2-5, the intersections of I-405 Northbound Off-Ramp/Ash Avenue and Manchester Avenue (Intersection #129), Inglewood Avenue and Manchester Boulevard

(Intersection #134), Inglewood Avenue and Arbor Vitae Street (Intersection #135) and La Cienega Boulevard and I-405 Southbound Ramps (n/o Century Bl) (Intersection #118) would improve during the evening peak hour. In addition, as shown on Figure 4.12.2-4, the intersections of I-405 Northbound Off-Ramp/Ash Avenue and Manchester Avenue (Intersection #129), La Brea Avenue and Arbor Vitae Street (Intersection #146), La Cienega Boulevard and I-405 Southbound Ramps (n/o Century Bl) (Intersection #118), and La Cienega Boulevard and I-405 Southbound Ramps (s/o Century Bl) (Intersection #120) would improve during the morning peak hour. Further, as shown in Table 4.12.2-18, contrary to the commentor's assertion, intersections in the Study Area along La Brea Avenue (Intersections 141 to 147), Prairie Avenue (Intersections 155 to 161 and 180), and Crenshaw Boulevard (Intersections 162 to 164) would not be significantly impacted under 2024 Future With Project conditions.

As discussed in Section 4.12.2.7.1 and shown in Table 4.12.2-20, and Figures 4.12.2-6 and 4.12.2-7 (as revised in Chapter 3 of the Final EIR), under the 2035 Future With Project scenario, significant (and cumulatively considerable) impacts would occur at one intersection during the a.m. peak hour; at five intersections during the p.m. peak hour; and at two intersections during both the a.m. and p.m. peak hour, as follows:

- Sepulveda Boulevard and Century Boulevard. Significant impact in the a.m. peak hour at LOS E
- Aviation Boulevard and Arbor Vitae Street. Significant impact in the p.m. peak hour at LOS F
- I-105 Freeway Ramps (east of Aviation Boulevard) and Imperial Highway. Significant impact in the p.m. peak hour at LOS C.
- La Cienega Boulevard and Florence Avenue. Significant impact in the p.m. peak hour at LOS F
- La Cienega Boulevard and Manchester Boulevard. Significant impact in the p.m. peak hour at LOS F
- La Cienega Boulevard and Arbor Vitae Street. Significant impact in the a.m. peak hour at LOS F and in the p.m. peak hour at LOS F
- La Cienega Boulevard and Century Boulevard. Significant impact in the a.m. peak hour at LOS F and in the p.m. peak hour at LOS F.
- Inglewood Avenue and Century Boulevard. Significant impact in the p.m. peak hour at LOS F.

Four intersections would be significantly impacted during the mid-day peak hour, as follows:

- Sepulveda Boulevard and Century Boulevard. Significant impact in MD Peak Hour at LOS D
- Aviation Boulevard and Arbor Vitae Street. Significant impact in MD Peak Hour at LOS C
- La Cienega Boulevard and Manchester Boulevard. Significant impact in MD Peak Hour at LOS F
- La Cienega Boulevard and Century Boulevard. Significant impact in MD Peak Hour at LOS D

The proposed Project would not result in significant traffic impacts at the remaining 175 of the 183 study intersections during either the a.m. or p.m. peak hour, or the remaining 32 of the 36 study intersections for the midday peak hour. As shown on Figure 4.12.2-7 (as revised in Chapter 3 of the Final EIR), the intersections of La Cienega Boulevard and I-405 Southbound Ramps (n/o Century Bl) (Intersection #118), Inglewood Avenue and Arbor Vitae Street (Intersection #135), La

Brea Avenue and Arbor Vitae Street (Intersection #146), and La Brea Avenue/Hawthorne Boulevard and Century Boulevard (Intersection #147) would improve during the evening peak hour. In addition, as shown on Figure 4.12.2-6 (as revised in Chapter 3 of the Final EIR), the intersections of I-405 Northbound Off-Ramp/Ash Avenue and Manchester Avenue (Intersection #129), Inglewood Avenue and Manchester Boulevard (Intersection #134), La Brea Avenue and Arbor Vitae Street (Intersection #146), La Cienega Boulevard and I-405 Southbound Ramps (n/o Century Bl) (Intersection #118), and La Cienega Boulevard and I-405 Southbound Ramps (s/o Century Bl) (Intersection #120) would improve during the morning peak hour. Further, as shown in Table 4.12.2-20, contrary to the commentor's assertion, intersections in the Study Area along La Brea Avenue (Intersections 141 to 147), Prairie Avenue (Intersections 155 to 161 and 180), and Crenshaw Boulevard (Intersections 162 to 164) would not be significantly impacted under 2035 Future With Project conditions.

As discussed in Section 4.12.2.9 of the Draft EIR, the program to mitigate the significant impacts identified for the Project, including significantly impacted intersections within the City of Inglewood's jurisdiction, includes the following major components:

- Implementation of a site-wide Transportation Demand Management (TDM) program for LAX-site employees to provide a variety of additional transportation access choices in order to promote non-auto travel.
- Intelligent signal system improvements, including signal controller upgrades and installation of CCTV cameras at key intersections within the Study Area.
- Specific intersection improvements, including physical mitigations and signal system and phasing enhancements.
- Fair-share contributions to highway improvements

As discussed in Section 4.12.2.10, the proposed measures would fully mitigate all Project-related intersection impacts under the 2024 With Project scenario to less than significant levels. As shown in Table 4.12.2-38 of the Draft EIR, with implementation of proposed mitigation measures, the 2035 Future With Project condition would result in seven intersections with less than significant impacts and one intersection (La Cienega Boulevard and Arbor Vitae Street) with a significant unavoidable impact which would also be cumulatively considerable. No feasible further mitigation measures are available to reduce this impact to a less than significant level that are in LAWA's control. Right-of-way within the City of Inglewood would be required to further reduce the impact at this intersection. Therefore, working closely with Inglewood, LAWA proposed ITS improvements along La Cienega Boulevard (including the intersection of La Cienega Boulevard and Arbor Vitae Street) and along Century Boulevard (Mitigation Measure MM-ST (LAMP)-7); this mitigation measure would further reduce the significant impact at the La Cienega Boulevard at Arbor Vitae Street intersection, but the impact would remain significant and unavoidable.

However, the City of Inglewood has expressed, in meetings with LAWA staff, its intent not to widen this intersection. LAWA does not have the authority to condemn property within the City of Inglewood to implement this improvement. Therefore, this mitigation measure is considered infeasible. The City of Inglewood has made similar conclusions regarding the undesirability of condemnation to implement traffic mitigation measures in its own EIRs. See Inglewood Hollywood Park Specific Plan Final EIR, Response 6.5:[1]

> The physical measures were found to be infeasible because they would require right-of-way acquisition, which would likely require condemnation proceedings, would displace current residents and businesses and would take a significant amount of time to

accomplish, if the improvements could even be accomplished. On the other hand, the implementation of the ITS system does not pose the same downsides, can be easily implemented without instituting condemnation proceedings, and mitigates the Project's impacts.

[1] Inglewood Hollywood Park Specific Plan Final EIR is available online at: http://www.cityofinglewood.org/depts/economic_n_community_development/planning/hollywood_park_specific_plan.asp, with the responses to comments included at: http://www.cityofinglewood.org/pdfs/commdev/HP-FDEIR/IV_comments.pdf.

**LAMP-AL00010-2**

**Comment:** The City is concerned that the proposed Transportation Demand Management program is unclear on how it will be measured and implemented and how will it address traffic impacts directly affecting the City of Inglewood.

**Response:** The TDM Program for the proposed Project is described in Section 4.12.2.9.1 of the Draft EIR and would be implemented as described therein [MM-ST (LAMP) – 6]. The mitigation measure description specifies that the TDM Program would include specific actions to be undertaken, including a detailed LAX-based employee travel demand survey, an LAX TDM Program with a series of measures, a follow-up survey to ascertain pros and cons of the Program elements, identification of any needed adjustments, and retooling Program elements. The TDM Program could include choice of alternative transport, enhanced vanpool, carpool programs and provision of transit passes; and car-share and employee shuttle programs. After 9 months of launching the TDM Program, LAWA would conduct another follow-up survey to ascertain the performance of the Program, pros and cons of the Program elements, and consider re-tooling the Program to maximize its effectiveness.

Additionally, the effect of the Program was assumed to be a very conservative 5 percent of employee trip reduction. The past success of LAWA TDM measures is a predictor that the relatively modest 5 percent additional trip reduction target can easily be achieved. LAWA has a comprehensive rideshare and vanpool program available to all LAWA employees, which offers financial incentives and discounts to participating employees. As noted in the annual Sustainability Report,[1] LAWA's Rideshare Program has a 23 percent participation rate and saved more than 300,000 gallons of fuel in 2015. Additionally the U.S. Environmental Protection Agency (EPA) considers the LAWA program to be one of the most comprehensive programs offered by an employer in Southern California. It is part of the EPA's Best Workplaces for Commuters Program that distinguishes and provides national recognition to employers offering outstanding commuter benefits. In order to participate in this program, employers must meet the EPA's National Standard of Excellence in commuter benefits. As noted in the Sustainability Report, based on a study conducted by the Transportation Research Board in 2012, LAWA's voluntary rideshare program is the largest and most comprehensive airport employee rideshare program in the U.S. While this program is currently solely for LAWA employees, the proposed mitigation measure for the LAX Landside Access Modernization Program would expand participation to any Airport employee (TSA, airline, cargo, etc.).

The analyses of traffic conditions in 2024 and 2035 with proposed mitigation measures, including the TDM Program effectiveness are presented in Section 4.12.2.10 of the Draft EIR.

[1] City of Los Angeles, Los Angeles World Airports, Los Angeles World Airports Sustainability Report 2015, Available: http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf.

**LAMP-AL00010-3**

**Comment:** The City of Inglewood also has concerns about the phasing of roadway construction. It is anticipated that because of the Projects very tight schedule, most arterial roadways slated to be improved will occur almost simultaneously. The City would like clearer detail on the Construction Management Plan and associated mitigation measures. The City believes that the identified traffic mitigation measures in the City of Inglewood should be implemented prior to commencement of construction of the Project. The City looks forward to working with LAWA in addressing these concerns.

**Response:** The timing of roadway improvements would greatly depend on the individual developers of the various proposed Project components. Until LAWA has awarded design and construction contracts and determined which roadway improvements will be included with specific contracts, it is impossible to specify exact timing of improvements. The Draft EIR assumed that roadway improvements would occur between 2018 and 2023, and made assumptions on when those improvements would occur during that timeframe. However, a detailed Construction Management Plan and schedule for those improvements has not yet been developed. The specific details associated with construction traffic phasing and management plans, including associated mitigation measures, would all be coordinated with the City of Inglewood at the time of final design of the various facilities and roadways. See Draft EIR Mitigation Measures MM-ST (LAMP)-1, Construction Traffic Task Force, and MM-ST (LAMP)-3, Worksite Traffic Control Plans.

The commentor suggests that these measures be implemented before construction. This recommendation is infeasible. Numerous components of these measures by their very nature must occur during construction. Among other things, these measures include provisions for detours, limitations on roadway closures, construction management plans, including signage, noticing, flaggers, sequencing limits, and requirements to comply with the California Manual on Uniform Traffic Control Devices (MUTCD).[1] As part of these MUTCD requirements, there are provisions for coordination with local emergency services, training for flagman for emergency vehicles traveling through the work zone, temporary lane separators that have sloping sides to facilitate crossover by emergency vehicles, and vehicle storage and staging areas for emergency vehicles. MUTCD requirements also provide for construction work during off-peak hours and flaggers. These requirements also include provisions for "Detour for Bike Lane on Roads with Closure of One Travel Direction." While these measures call for consultation and planning prior to initiation of various construction activities, these measures are substantively designed to be implemented during construction. Please see Response LAMP-AL00008-34 for additional details regarding the adequacy of the proposed mitigation measures.

Please note that the proposed measures are similar to the measures utilized by the City of Inglewood. The City of Inglewood prepared an EIR for its Hollywood Parking Specific Plan,[2] which included redevelopment of 238 acres with 2,995 dwelling units, 620,000 sq. ft. of retail space, 75,000 sq. ft. of office/commercial space, a 300-room hotel with 20,000 sq. ft. or related meeting space, 10,000 sq. ft. of community serving uses. The EIR also included a Conceptual Circulation Plan and numerous roadway modifications. These improvements included widening, re-striping, adding signalization and/or reconfiguration of roadway segments and intersections. These improvements would require intermittent, short-term roadway and intersection closures and may involve temporary detours at the affected locations. In addition, off-site utility infrastructure improvements would be required to connect the project to adjacent water lines, sewer lines, and storm drains. (Inglewood Final EIR, Project Description ["Off-Site Improvements."].) In Response 9.87, Inglewood concluded that construction traffic impacts would be less than significant, relying upon measures similar to the measures utilized by LAWA for the proposed Project:

With respect to threshold (e), as stated on Page IV K-19, construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant for the following reasons: (1) construction impacts are temporary in nature and do not cause lasting effects; and (2) partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the project site, flagmen would be used to facilitate the traffic flow until construction is complete. Project construction would not be expected to impact fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LACoFD. Therefore, impacts to emergency access services would be less than significant.

[1] California State Transportation Agency, Department of Transportation, California Manual on Uniform Traffic Control Devices, FHWA's MUTCD 2009 Edition, including Revisions 1 & 2 as amended for use in California, 2014 Edition (including Revision 1), November 7, 2014.

[2] Inglewood Hollywood Park Specific Plan Final EIR is available online at: http://www.cityofinglewood.org/depts/economic_n_community_development/planning/hollywood_park_specific_plan.asp, with the responses to comments included at: http://www.cityofinglewood.org/pdfs/commdev/HP-FDEIR/IV_comments.pdf; Project Description available online at: http://www.cityofinglewood.org/pdfs/commdev/HP-FDEIR/II_Project_Description.pdf.

## LAMP-AL00011 Bonin, Mike City of Los Angeles, 11th District 11/15/2016

**LAMP-AL00011-1**

**Comment:** Thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for Los Angeles World Airport's (LAWA's) Landside Access Modernization Program (LAMP) at Los Angeles International Airport (LAX).

As a member of the Board of Directors for the Los Angeles County Metropolitan Transportation Authority (Metro) and the Councilmember representing the Eleventh District in the City of Los Angeles, I am very proud of the work that LAWA has completed to date to release the Draft EIR for the LAMP project. This is a major milestone for the City of Los Angeles as it gets us one step closer to delivering a nearly $5.5 billion modernization program focused on improving access to and from the airport, connecting the regional Metro Rail system to LAX, reducing traffic congestion, and enhancing the overall passenger experience.

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

**LAMP-AL00011-2**

**Comment:** This is a transformational project for the City of Los Angeles and the region as a whole. Therefore, a detailed analysis of how LAMP may affect the region and the surrounding community along with a robust plan for mitigation of any potential impacts are important components of the Draft EIR. I understand that several key stakeholders and community groups have provided comments on the Draft EIR, and I am confident LAWA will address those comments thoroughly in the Final EIR for the project.

**Response:** Please see Responses to Comments LAMP-AL00011-3 through LAMP-AL00011-8 below. In accordance with Section 15088 of the State CEQA Guidelines, as part of this Final EIR, LAWA prepared responses to all comments received on the LAX Landside Access Modernization Program Draft EIR, including all comments received from stakeholders and community groups.

**LAMP-AL00011-3**

**Comment:** As LAWA moves forward with the Final EIR, I would like to bring to your attention a few additional items that are critical to the project's success including the following:

1. Transportation Demand Management

LAWA's proposed mitigation measure MM-ST (LAMP)-6, Transportation Demand Management (TDM) Program, for LAX employees and the hotel / office employees working in the adjacent Gateway to Los Angeles Business Improvement District (BID), is a critical element for the success of LAMP. Together, these employees represent a large share of the daily traffic traveling into and around the airport. By implementing the TDM Program and providing these employees alternative modes of transportation to access their workplace, LAWA can significantly reduce daily automobile trips into the airport area and improve traffic flow. As a member of the Metro Board of Directors, it is my goal to encourage alternative modes of transportation to LAX. Therefore, I encourage LAWA to begin taking the steps necessary to implement this mitigation measure *now*, rather than waiting to begin implementation of such a critical measure until the start of construction for the LAMP program.

**Response:** LAWA is proud of its efforts to reduce employee trips to LAX through its existing rideshare, vanpool, and FlyAway programs. As the commentor notes, LAWA is proposing as part of the LAX Landside Access Modernization Program, to implement a Transportation Demand Management (TDM) Program, identified as Mitigation Measure MM-ST (LAMP)-6 on page 4.12-179 in Section 4.12.2.9.1 of the Draft EIR, which would widen the scope of its trip reduction efforts and offer employees more choices on how to get to and from work. LAWA is examining ways to implement a TDM Program soon after project approval and will continue to coordinate with the Councilmember's office on this mitigation measure.

**LAMP-AL00011-4**

**Comment:** 2. Construction Traffic Project Task Force

LAWA's proposed mitigation measure MM-ST (LAMP)-1, Construction Traffic Project Task Force, is similarly critical. The establishment of a task force to focus on construction traffic related impacts is necessary to ensure that we maintain a world class passenger experience during construction and that we effectively coordinate all construction traffic impacts / mitigations directly with our key local stakeholders including, but not limited to, the Westchester Town Center BID and the Gateway to Los Angeles BID. A large amount of construction will occur on public roadways outside of the airport and we therefore must ensure traffic managements plans,

including street closures and detour routes, are coordinated with the commercial districts adjacent to LAX. I applaud LAWA's commitment to establish this Task Force and strongly support this work effort moving forward.

**Response:** Please see Section 4.12.3.8 of the Draft EIR for a discussion of all proposed mitigation measures to address construction-related traffic impacts, including the establishment of a Project Task Force.

**LAMP-AL00011-5**

**Comment:** 3. Integrated Urban Environment with Functional and Attractive Design

Another key element to the overall success of the project is ensuring that LAMP is compatible with and enhances the character of the surrounding community. In order to achieve compatibility, it is important to ensure that the design and construction of the various off-airport LAMP project components provide an integrated urban environment with functional and attractive architecture, as well as safe and convenient pedestrian and bicycle connections that create a sense of place along Century Boulevard and the surrounding street network. A majority of the LAMP project components are located off-airport throughout the adjacent hotel and office business district. This area is considered by many to be the Gateway to Los Angeles, as it is the first or last impression of the City for millions of visitors traveling through LAX. For this reason, we must ensure the various LAMP facilities adhere to the project's design guidelines and meet a world class level of architecture and design. In addition, various LAMP project components will be located within walking and biking distance to transit and many hotel, office and commercial amenities. We must ensure there are safe and convenient pedestrian and bicycle connections to each of these facilities, including the Metro Crenshaw / LAX Line's Aviation / Century transit station.

**Response:** One of the key objectives of the proposed Project is to "[e]nhance and integrate the overall design of LAX Landside Access Modernization Program facilities with existing CTA structures and new airport facilities both inside and outside the CTA" (see page 2-7, in Chapter 2, Description of the Proposed Project, of the Draft EIR). To meet this objective, LAWA has created a comprehensive set of design guidelines as part of the proposed Project (see Appendix B of the Draft EIR). The overall purpose of the design guidelines is to provide a framework to enhance the visual quality of the environment in and around LAX, including creating a more positive user experience. The design guidelines would be incorporated into contract requirements for all project components.

The LAX Landside Access Modernization Program proposes to modify the Bike Plan as included in the existing Mobility Plan 2035 (see Figure 2-55 of the Draft EIR), which would include a bike path connecting the ITF West and ITF East/Metro 96th Street Transit Station, which would also run past the Aviation/Century transit station. In addition, the proposed ITFs would be designed to incorporate bicycle and pedestrian facilities, including bicycle parking and changing/shower facilities (see page 2-147 of the Draft EIR). Pedestrian access adjacent to the ITFs is discussed on pages 2-89, 2-90 and 2-109 of the Draft EIR. Sidewalk specifications for proposed roadway improvements are shown in Table 2-8 of the Draft EIR, as revised in Chapter 3, Corrections and Additions to the Draft EIR. See also Responses to Comments LAMP-PC00021-14, LAMP-PC00026-4, and LAMP-PC00031-6 regarding pedestrian access on Century and Sepulveda Boulevards.

**LAMP-AL00011-6**

**Comment:** 4. Sustainable Design, Construction, and Operations

The LAMP project must set the bar for sustainable development. Therefore, the project must require implementation of the highest standards for sustainability in design, construction, and operations for each of the LAMP project components including, but not limited to, energy and water conservation measures such as solar energy capture, electric vehicle chargers, and LEED certification.

**Response:** One of the underlying purposes of the proposed LAX Landside Access Modernization Program is to "promote the sustainability of LAX by improving the efficiency and operation of the surface transportation system in which LAX operates" (see page 2-7 in Chapter 2, Description of the Proposed Project, of the Draft EIR). As such, a comprehensive set of sustainability guidelines were developed as part of the Project (see Appendix B, LAX Design Guidelines, of the Draft EIR). Additionally, required sustainability initiatives as they pertain to greenhouses gases and energy and water use are discussed in Section 4.5, Greenhouse Gas Emissions, and Section 4.13, Utilities and Service Systems, respectively (see Tables 4.5-16, 4.13.2-3, and 4.13.3-3). Sustainability initiatives would be incorporated into design and construction contract requirements for all project components.

**LAMP-AL00011-7**

**Comment:** Lastly, as LAWA continues to move forward with the detailed design of the Automated People Mover system and its integration with the Airport Metro Connector 96th Street Transit Station, we must ensure there is a seamless connection between the two facilities that reduces walking distances and improves the travel experience for all passengers. I commend both LAWA's and Metro's collaborative efforts to date to achieve this and look forward to further collaboration as both agencies proceed with detailed designs.

**Response:** The connection between the proposed Intermodal Transportation Facility (ITF) East Automated People Mover (APM) Station and the Los Angeles County Metropolitan Transportation Authority (Metro) proposed Airport Metro Connector (AMC) 96th Street Transit Station is discussed on page 2-90 and shown on Figure 2-31 in Chapter 2, Description of the Proposed Project, of the Draft EIR. LAWA is committed to working with Metro to ensure seamless connection between the two facilities, along with other issues related to the LAX Landside Access Modernization Program throughout design, construction, and implementation. LAWA thanks the Councilmember for his continued support and interest in making a connection between LAWA's APM and Metro's AMC 96th Street Transit Station and will continue to coordinate with the Councilmember's office on this project element.

**LAMP-AL00011-8**

**Comment:** Thank you again for the opportunity to comment on the Draft EIR. This project is vital to building not only a world-class airport with unmatched passenger conveniences, but also a first-class neighbor to the surrounding communities. Should you have any questions regarding this letter, please contact my LAX Community Liaison, Omar Pulido, at (323) 740-0494 or at omar.pulido@lacity.org.

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

## LAMP-AL00012 Impett, Laura Shute, Mihaly & Weinberger LLP (City of El Segundo) 12/2/2016

**LAMP-AL00012-1**

**Comment:** On behalf of the City of El Segundo, we submit the following report prepared by Neal Liddicoat with MRO Engineers. Mr. Liddicoat, a traffic engineer, has reviewed the Draft Environmental Impact Report's ("DEIR") transportation/traffic analysis for the Landside Access Modernization Program. The MRO Engineers' report identifies potentially significant deficiencies in the DEIR's transportation/traffic analysis that LAWA should carefully evaluate as part of an informative and comprehensive EIR.

**Response:** The Draft EIR evaluated and identified the potential transportation/traffic-related environmental effects of the proposed Project in Section 4.12, Transportation/Traffic. Please see Responses to Comments LAMP-AL000012-3 through LAMP-AL00012-18 below regarding the specific comments on the transportation/traffic analysis conducted for the proposed Project.

**LAMP-AL00012-2**

**Comment:** As requested, MRO Engineers, Inc., (MRO) has reviewed the "Transportation/Traffic" section of the Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Landside Access Modernization Program (Los Angeles World Airports, September 2016). The "Transportation/Traffic" section of the DEIR is based on a traffic impact analysis prepared by Raju Associates (Raju). (Reference: Raju Associates, Inc., *Draft Transportation Study for the Landside Access Modernization Program DEIR*, September, 2016.) The Raju traffic study is presented as Appendix O to the DEIR.

Our review focused on the technical adequacy of the Transportation/Traffic analysis, including the detailed procedures and conclusions documented in the Raju study.

**Transportation/Traffic Analysis Review**

Our review of the DEIR Transportation/Traffic analysis revealed potentially significant deficiencies that should be addressed prior to approval of the project and its related environmental documentation by the City of Los Angeles. These issues are summarized below.

**Response:** The Draft EIR evaluated and identified the potential transportation/traffic-related environmental effects of the proposed Project in Section 4.12, Transportation/Traffic. Please see Responses to Comments LAMP-AL000012-3 through LAMP-AL00012-18 below regarding the specific comments on the transportation/traffic analysis conducted for the proposed Project.

**LAMP-AL00012-3**

**Comment:** 1. ***Traffic Volume Data Does Not Accurately Represent LAX Activity*** – Traffic volume data for the 183 study intersections was collected at various times between 2013 and 2015. The traffic count summary sheets for 179 of the study intersections are presented in DEIR Appendix O. The years in which those traffic counts were conducted are summarized below:

- 2016 – 3 locations,
- 2015 – 130 locations,
- 2014 – 40 locations, and

- 2013 – 6 locations.

DEIR p. 4.12-59 presents slightly different information regarding when the counts used in the study were performed:

- 2016 – 0 locations,
- 2015 – 133 locations,
- 2014 – 44 locations, and
- 2013 – 6 locations.

Of greater interest are the months in which the data were collected, according to the data sheets in Appendix O:

- January – 3 locations,
- February – 3 locations,
- March – 76 locations,
- April – 38 locations,
- May – 4 locations,
- June – 0 locations,
- July – 23 locations,
- August – 0 locations,
- September – 13 locations,
- October – 13 locations,
- November – 0 locations,
- December – 6 locations,

DEIR p. 4.12-11 provides information regarding monthly traffic activity in the LAX Central

Terminal Area (CTA) for the years 2006 through 2014. As described there:

> . . . CTA traffic reached peak activity during the summer months of June, July and August. August is typically the peak month for Airport roadway traffic followed closely by July. For the purposes of this analysis, August 2014 was used as the peak month for traffic data, because the field data was collected in August. Although July had slightly more passengers in 2014, the analysis was based on a peak month average day in August.

This quote specifically applies to the analysis of on-airport traffic conditions, but it also relates to the off-airport traffic analysis, since the two systems are inextricably linked; all vehicles traveling to or from the on-airport road system must also use the off-airport road system. For that reason, it is instructive to compare the intersection data collection schedule to the level of traffic activity at LAX. Table 1 presents that comparison, with the CTA average daily traffic volumes ranked from highest month to lowest month.

**Table 1**

**CTA Traffic Volume Data vs. Data Collection Schedule**

| | CTA Traffic Volume Data[1] | | Intersection Counts[2] | | |
|---|---|---|---|---|---|
| Month | Average Daily Traffic[3] | Monthly Ranking | Monthly Ranking | No. | % |
| August | 77,311 | 1 | 10 | 0 | 0.0% |
| July | 76,476 | 2 | 3 | 23 | 12.8% |
| June | 75,635 | 3 | 10 | 0 | 0.0% |
| December | 72,647 | 4 | 6 | 6 | 3.4% |
| May | 71,404 | 5 | 7 | 4 | 2.2% |
| April | 69,091 | 6 | 2 | 38 | 21.2% |
| November | 69,064 | 7 | 10 | 0 | 0.0% |
| March | 67,996 | 8 | 1 | 76 | 42.5% |
| September | 67,838 | 9 | 4 | 13 | 7.3% |
| October | 67,418 | 10 | 4 | 13 | 7.3% |
| January | 65,673 | 11 | 8 | 3 | 1.7% |
| February | 63,553 | 12 | 8 | 3 | 1.7% |

Notes:

[1] Source: DEIR Table 4.12.1-2: CTA Average Daily Traffic Volumes, p. 4.12-11.

[2] Source: DEIR Appendix O.

[3] Overall average of all data points in DEIR Table 4.12.1-2 is 70,358 vehicles per day.

While August has historically had the highest average daily traffic volumes in the CTA, none of the intersection traffic counts used in the DEIR Transportation/Traffic analysis were performed in that month. This is also true for June, which is the third busiest month in the CTA. In July, the second busiest month, 23 (12.8 percent) of the 179 counts were performed.

The largest number of intersection traffic counts (76 counts, representing 42.5 percent of the counts) were conducted in March, which is the eighth busiest month in the CTA. Thirty-eight counts (21.2 percent) were performed in April, which is the sixth busiest month in the CTA. The average daily traffic volumes in those two months are 88 – 90 percent of the August volumes. In addition, they are somewhat below the overall average value of 70,358 vehicles per day, based on all of the data points (from 2006 through 2014) in DEIR Table 4.12.1-2.

Clearly, the “existing conditions” intersection traffic volumes employed in the DEIR analysis are not representative of the level of activity at LAX. Over 60 percent of the counts were performed in the bottom half of the ranking of monthly traffic volumes in the CTA. Only about 13 percent of the counts were conducted in the busiest three months.

In short, the existing traffic volumes are too low to accurately reflect traffic operations in the study area. As a result, the existing conditions level of service findings provide an overly optimistic view of the average vehicular delay and the current level of congestion in the study area. This deficiency will carry through to all subsequent analysis scenarios, so that intersection delays and project-related impacts will be understated.

**Response:** The minor discrepancy regarding the years when traffic counts used in the Traffic Study were conducted as provided in Section 4.12.2 and Appendix O of the Draft EIR has been corrected in the Final EIR. The text under the heading Traffic Count Data on page 4.12-59 and in Appendix B of Appendix O of the Draft EIR is revised as follows:

> Existing traffic volumes were compiled using video footage during morning and evening peak hours collected between 2013 and 201*6*~~5~~. Data for ~~13~~3 of 183 intersections was collected in 201*6*~~5~~; *while* data *was collected for 130 intersections in 2015 and* for 44 intersections ~~was collected~~ in 2014.

The above revisions are included in Chapter 3, Corrections and Additions to the Draft EIR.

Next, the commentor lays out details of the months in which traffic counts at various analysis locations were conducted and compares the same to the level of passenger activity by month to provide an assertion that traffic counts on the off-Airport street system were conducted during months when passenger activity levels were not at their highest at LAX and that the existing traffic volumes reported in the Draft EIR are too low to reflect accurately, the current level of congestion in the study area. Based on the below analysis, the commentor's assertion that the Draft EIR's existing traffic volumes are too low to accurately reflect traffic operations in the study area is incorrect.

At the commencement of the Traffic Study, Raju Associates and the LAWA team met with a Technical Advisory Committee consisting of transportation engineering and planning representatives from the California Department of Transportation (Caltrans), Southern California Association of Governments (SCAG), City of Los Angeles Department of Transportation (LADOT), and Los Angeles County Metropolitan Transportation Authority (Metro) to present the assumptions, parameters and methodology associated with the Traffic Study for the proposed Project. As part of that effort, the scope of analysis and a detailed data collection plan were discussed and coordinated.

Multiple traffic counts at various analyzed locations during summer (June, July, and August) and non-summer months (September through May) were collected and compiled. A review of all traffic counts collected at a specific intersection was performed and the count that reflected the maximum traffic volumes for that intersection, irrespective of the specific month in which they were collected, were chosen to conservatively reflect maximum traffic volumes and congestion levels for use in the traffic study. Therefore, contrary to the speculative notion that the existing counts are too low to accurately reflect current congestion levels presented by the commentor, the existing conditions data presented in Section 4.12 and Appendix O of the Draft EIR reflect a conservative evaluation of traffic conditions at the various locations, including the activity levels of LAX.

Traffic volume data at several intersections within the study area were compiled from traffic counts collected during summer and non-summer months. For informational purposes, a comparison of the summer versus non-summer months' traffic counts at these locations are shown in Table 1 below. It can be observed that the non-summer counts are greater than summer counts at most locations (i.e., at all locations in the AM peak hour and at 7 of 10 locations in the PM peak hour). On an overall basis, the non-summer counts at these intersections were greater than the summer counts by approximately 17 percent in the AM peak hour and 3 percent in the PM peak hour. It is worth noting, however, that summer counts, if greater were used in the Traffic Study. Twenty-three intersections had summer counts collected in July that were utilized in the Traffic Study.

**Table 1**

**Comparison of Non-Summer (September - May) Traffic Counts to Summer (June - August) Traffic Counts**

| | Non-Summer[1] | Summer [2] | Difference | | Non-Summer[1] | Summer [2] | Difference | |
|---|---|---|---|---|---|---|---|---|
| **Intersection** | **Total-AM Peak Hour** | **Total-AM Peak Hour** | **[1]-[2]** | **%** | **Total-PM Peak Hour** | **Total-PM Peak Hour** | **[1]-[2]** | **%** |
| Airport Boulevard & Arbor Vitae Street/Westchester Parkway | 3,410 | 2,979 | 431 | 13% | 3,764 | 3,298 | 466 | 12% |
| Aviation Boulevard & Arbor Vitae Street | 3,196 | 2,390 | 806 | 25% | 3,181 | 2,920 | 261 | 8% |
| La Cienega Boulevard & Arbor Vitae Street | 3,235 | 2,371 | 864 | 27% | 2,951 | 2,799 | 152 | 5% |
| La Cienega Boulevard & Century Boulevard | 5,432 | 4,534 | 898 | 17% | 5,221 | 5,318 | (97) | -2% |
| I-405 Northbound Ramps & La Tijera Boulevard[3] | 3,866 | 3,191 | 675 | 17% | 3,737 | 3,750 | (14) | 0% |
| I-405 Southbound Ramps & La Tijera Boulevard[3] | 4,057 | 3,268 | 789 | 19% | 3,770 | 3,889 | (119) | -3% |
| Sepulveda Boulevard & Westchester Parkway | 5,016 | 4,230 | 786 | 16% | 5,069 | 4,894 | 175 | 3% |
| Centinela Avenue & Washington Place | 4,103 | 3,944 | 159 | 4% | 4,823 | 4,472 | 351 | 7% |
| La Cienega Boulevard & I-405 SB Ramps (n/o Century Boulevard) | 2,993 | 2,259 | 734 | 25% | 2,858 | 2,500 | 358 | 13% |
| I-405 NB Ramps & Century Boulevard | 4,117 | 3,580 | 537 | 13% | 4,051 | 4,030 | 21 | 1% |
| **Total** | **39,425** | **32,747** | **6,679** | **17%** | **39,425** | **37,871** | **1,554** | **4%** |

Source: Raju Associates, February 2017.

Notes:

AM Peak Hour = Highest hour in AM Peak Period between 7-10 AM or 7-9 AM and PM Peak Hour = Highest hour in PM Peak Period between 3-6 PM or 4-6 PM

[1] Non-Summer count from 2015, unless otherwise noted.

[2] Summer counts from July 2014. Factored 1.5% per year to reflect 2015 conditions.

[3] Non-Summer count from 2013. Factored 1.5% per year to reflect 2015 conditions.

Metro was commencing construction activities associated with the LAX/Crenshaw light rail line within the study area in July 2015 and was shutting down travel lanes along Arbor Vitae Street, Aviation Boulevard, Century Boulevard and Imperial Highway. LAWA conducted traffic counts at 23 locations in July 2015 (See Figure 1) in the vicinity of the impending lane closures prior to closure of travel lanes along the facilities noted above. These locations also happen to be those that are adjacent to LAX and its facilities, and consequently, are also those with higher summer traffic volumes. As shown in Table 4.12.1-2 of the Draft EIR, the peak month for traffic in the CTA varies between June, July, and August from year to year. Thus, traffic counts taken in July 2015 are representative of peak traffic within the CTA.

To provide a further response to this comment, freeway segment traffic count data from Performance Management System and Traffic Data Reports provided by Caltrans[1] were compiled for summer and non-summer conditions peak hour traffic flows. A summary of the comparison of summer versus non-summer traffic flows during the AM and PM peak hours at the twenty-three analyzed freeway segments in both directions is presented in Table 2 below. It can be observed from this table that the non-summer counts at almost all locations are considerably higher in the AM and PM peak hours (15% to 19%, respectively) compared to those in the summer months along the analyzed freeway segments. Caltrans concurred with the use of non-summer traffic counts for analysis purposes in the EIR's traffic study.[2]

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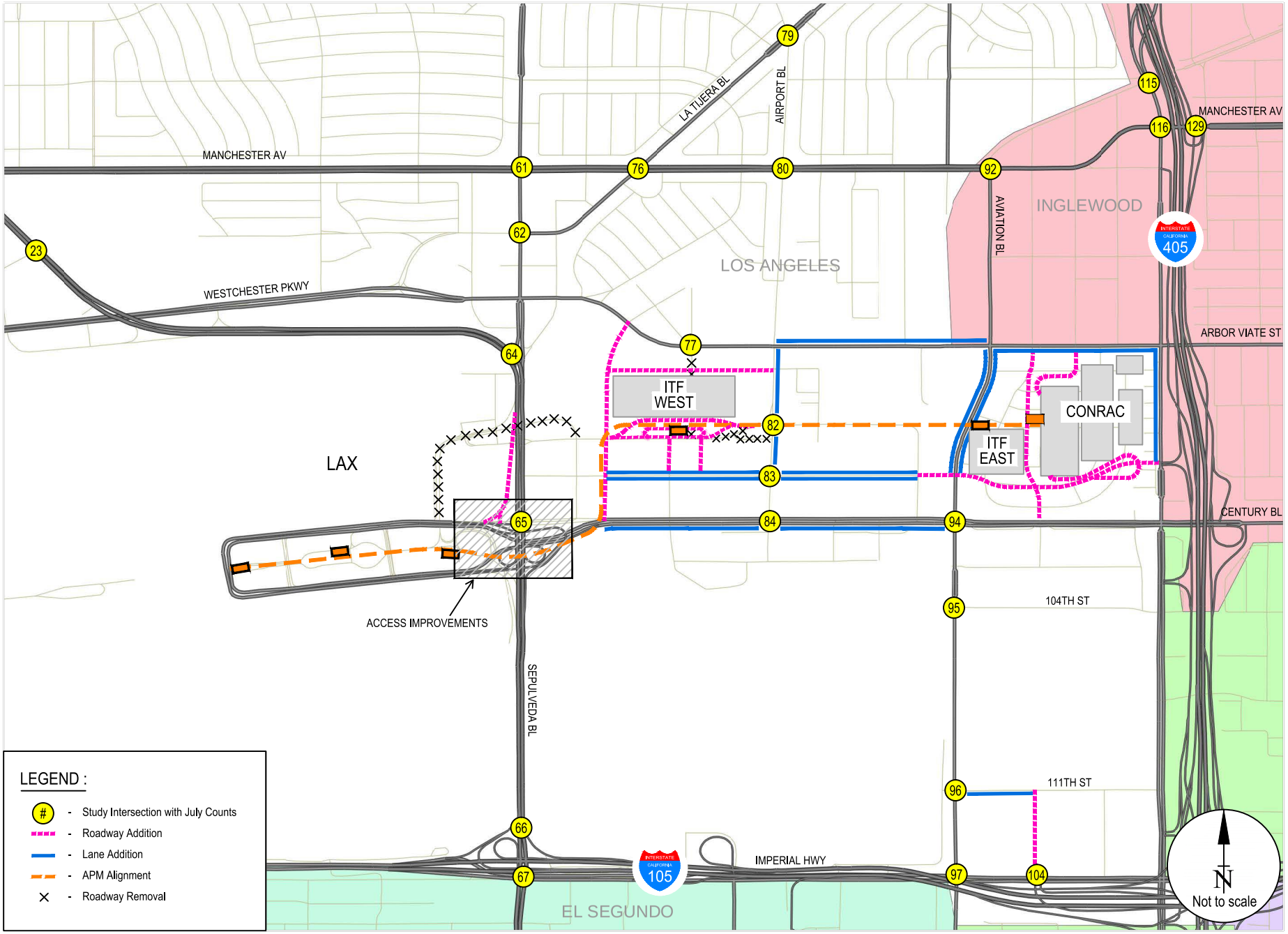


FIGURE 1
STUDY INTERSECTIONS WITH JULY TRAFFIC COUNTS

RAJU Associates, Inc.

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**Table 2**

**Freeway Segment Mainline Peak Hour Traffic Volumes – Non-Summer (September – May) vs Summer (June - August)**
**Existing Conditions**

| NO. | FREEWAY SEGMENT | POST MILE | DIRECTION | LANES | USED IN TRAFFIC STUDY: Non-Summer (2015) AM PEAK HOUR VOLUME[1] | USED IN TRAFFIC STUDY: Non-Summer (2015) PM PEAK HOUR VOLUME[1] | Summer (2015) AM PEAK HOUR VOLUME[1] | Summer (2015) PM PEAK HOUR VOLUME[1] |
|---|---|---|---|---|---|---|---|---|
| 1. | I-405 | 19.16 | NB | 4 | 8,616 | 7,953 | 7,821 | 7,381 |
| | at Rosecrans Avenue (PM 19.16) | 19.16 | SB | 4 | 7,709 | 7,056 | 6,362 | 5,959 |
| 2. | I-405 | 19.57 | NB | 4 | 10,541 | 10,728 | 9,308 | 9,395 |
| | South of El Segundo Boulevard (PM 19.57) | 19.57 | SB | 4 | 9,594 | 9,095 | 8,468 | 6,607 |
| 3. | I-405 | 20.6 | NB | 4 | 6,424 | 6,903 | N/A | N/A |
| | South of I-105 (PM 20.60) | 20.6 | SB | 4 | 6,340 | 5,483 | 6,231 | 3,979 |
| 4. | I-405 | 22.68 | NB | 4 | 7,943 | 9,087 | 5,525 | 8,683 |
| | at Century Boulevard (PM 22.68) | 22.00 | SB | 4 | 9,404 | 7,815 | 6,142 | 4,227 |
| 5. | I-405 | 23.36 | NB | 4 | 6,956 | 7,879 | 4,750 | 7,397 |
| | South of Manchester Avenue(PM 23.36) | 23.29 | SB | 4 | 9,991 | 7,777 | N/A | N/A |
| 6. | I-405 | 23.61 | NB | 4 | 7,772 | 8,856 | N/A | N/A |
| | at La Cienega Boulevard (PM 23.61) | 23.61 | SB | 4 | 8,146 | 7,500 | N/A | N/A |
| 7. | I-405 | 24.25 | NB | 4 | 7,594 | 8,533 | 4,782 | 6,634 |
| | at La Tijera (PM 24.25) | 24.25 | SB | 4 | 6,823 | 7,227 | 6,984 | 6,951 |
| 8. | I-405 | 25.10 | NB | 4 | 7,112 | 7,451 | 4,525 | 6,905 |
| | at Howard Hughes Parkway (PM 25.10) | 24.90 | SB | 4 | 9,368 | 7,969 | 8,490 | 6,912 |
| 9. | I-405 | 25.41 | NB | 4 | 7,568 | 7,536 | N/A | N/A |
| | at Centinela Avenue (PM 25.41) | 25.41 | SB | 5 | 9,743 | 8,643 | 8,774 | 7,179 |
| 10. | I-405 | 26.00 | NB | 4 | 6,569 | 6,561 | 4,236 | 5,754 |
| | at Jefferson Boulevard (PM 26.00) | 26.00 | SB | 4 | 10,853 | 8,852 | 8,335 | 6,360 |
| 11. | I-405 | 26.15 | NB | 5 | 6,529 | 6,721 | 4,256 | 5,794 |
| | North of SR-90 (PM 26.15) | 26.15 | SB | 5 | 8,718 | 7,233 | 8,685 | 6,148 |
| 12. | I-405 | 26.84 | NB | 5 | 7,853 | 7,711 | 6,849 | 6,193 |
| | at Braddock Boulevard (PM 26.84) | 26.84 | SB | 5 | 8,412 | 6,722 | 8,093 | 5,295 |
| 13. | I-405 | 27.35 | NB | 5 | 7,831 | 7,732 | 7,045 | 6,201 |
| | at Culver Boulevard (PM 27.35) | 27.35 | SB | 5 | 8,390 | 6,849 | 8,105 | 5,413 |
| 14. | I-405 | 27.81 | NB | 5 | 7,262 | 7,898 | 8,738 | 7,365 |
| | South of Venice (PM 27.81) | 27.81 | SB | 5 | 8,390 | 6,849 | 7,924 | 5,161 |
| 15. | I-105 | R0.90 | EB | 3 | 4,092 | 4,190 | N/A | N/A |
| | at Hughes Way (PM R.90) | R0.90 | WB | 3 | 5,408 | 3,058 | N/A | N/A |
| 16. | I-105 | R1.30 | EB | 3 | 6,240 | 6,414 | N/A | N/A |
| | at Douglas Street (PM R1.30) | R1.30 | WB | 3 | 7,160 | 3,480 | N/A | N/A |
| 17. | I-105 | R1.80 | EB | 3 | 3,029 | 3,614 | N/A | N/A |
| | at Imperial Highway (PM R1.80) | R1.80 | WB | 3 | 6,323 | 4,786 | N/A | N/A |
| 18. | I-105 | R2.82 | EB | 3 | 3,447 | 3,737 | 3,299 | 2,569 |
| | West of Hawthorne Avenue (PM R2.82) | R2.60 | WB | 3 | 4,724 | 2,919 | 4,341 | 2,626 |
| 19. | I-105 | R3.10 | EB | 3 | 5,382 | 4,610 | N/A | N/A |
| | West of Prairie Avenue (PM R3.30) | R3.30 | WB | 3 | 6,278 | 5,066 | 6,202 | 4,913 |
| 20. | I-105 | R4.20 | EB | 3 | 6,245 | 6,714 | 5,624 | 4,798 |
| | West of Crenshaw Boulevard (PM R4.00) | R4.00 | WB | 3 | 7,884 | 7,104 | N/A | N/A |
| 21. | I-105 | R5.50 | EB | 4 | 6,857 | 7,097 | 5,961 | 6,331 |
| | West of Normandie Avenue (PM R5.50) | R5.50 | WB | 4 | 7,123 | 6,859 | N/A | N/A |
| 22. | SR-90 | 1.24 | EB | 3 | 3,516 | 3,424 | 3,327 | 3,170 |
| | East of Ballona Creek (PM 1.24) | 1.24 | WB | 3 | 2,595 | 4,711 | N/A | N/A |
| 23. | SR-90 | 1.61 | EB | 3 | 3,156 | 2,844 | 3,488 | 3,184 |
| | at Centinela Avenue (PM 1.61) | 1.61 | WB | 4 | 2,644 | 2,448 | 2,622 | 2,300 |

Source: Raju Associates, February 2017.

Notes:

AM Peak Hour = Highest hour in AM Peak Period between 7-10 AM or 7-9 AM and PM Peak Hour = Highest hour in PM Peak Period between 3-6 PM or 4-6 PM

[1] Peak hour volume based on traffic volumes provided by Caltrans.

In summary, the existing traffic volume data utilized in the Traffic Study are the maximum observed volumes on both the on-Airport and off-Airport roadways that provide a conservative basis for analysis of existing and future conditions, and consequently for a reasonable traffic impact evaluation of baseline and future conditions (2024 and 2035) with the proposed Project. Thus, the commentor's assertion that the Draft EIR's existing traffic volumes are too low to accurately reflect traffic operations in the study area is incorrect. See Response to Comment LAMP-AL00012-6 for a discussion of the on-Airport and off-Airport traffic analyses.

[1] Freeway segment traffic count data from Performance Management System and Traffic Data Reports provided by Caltrans are voluminous in nature and are therefore not provided in hard-copy form in this EIR. These data are available for download and/or review, as electronic files, at LAWA Environmental Programs Group, One World Way, Room 218, Los Angeles California, 90045.

[2] California Department of Transportation (Caltrans), Letter from to DiAnna Watson, Branch Chief, District 7, to Lisa Trifiletti, Los Angeles World Airports, RE: Assumptions and Methodology Memo, Los Angeles International Airport (LAX) Landside Access Modernization Program (LAMP), Reference: IGR #150901DW, October 26, 2015; Raju Associates, Inc., Technical Memorandum Landside Access Modernization Program (LAMP) Project EIR Assumptions and Methodology for Traffic Study to Technical Steering Committee, August 30, 2015; Raju Associates, Inc., Memorandum Clarifications of Assumptions and Methodology Memorandum LAX Landside Access Modernization Program Project to Diana (sic) Watson, Caltrans District 7, August 30, 2015.

**LAMP-AL00012-4**

**Comment:** 2. ***Inadequate Midday Study Area*** – As noted above, the study area includes 183 intersections, all of which were included in the AM and PM peak hour analyses. According to DEIR p. 4.12-48:

> . . . 36 of these intersections (immediately adjacent to or in the vicinity of the Project site) have been selected for a midday off-peak hour traffic impact evaluation.

However, describing this as an "off-peak hour" analysis might be a misnomer. DEIR Figure 4.12.1-4 illustrates the pattern of arriving and departing passenger volumes over the course of an entire day. The arrival and departure patterns of airline passengers are closely linked to the traffic patterns of LAX as a whole.

According to DEIR p. 4.12-60, the midday traffic counts were generally conducted between 11:00 AM and 2:00 PM. Referring to DEIR Figure 4.12.1-4, a distinct peak in passenger arrival and departure activity is shown at about 11:00 AM. In fact, that peak is clearly higher than the total passenger activity shown in the AM (7:00 - 9:00 AM) and PM (4:00 - 6:00 PM) peak periods, for which all 183 intersections were analyzed.

In short, the midday traffic analysis is not inconsequential, given the LAX activity patterns demonstrated in the DEIR Transportation/Traffic section. This is clearly illustrated in DEIR Table 4.12.2-4, which summarizes the existing trip generation at LAX, as follows:

- AM Peak hour: 12,338 vehicle-trips,
- Midday peak hour: 16,097 vehicle-trips, and
- PM peak hour: 12,840 vehicle-trips.

As shown, the volume of traffic generated at LAX in the midday peak hour is 25 – 30 percent higher than either the AM or PM peak hours.

Therefore, it is inappropriate to limit the midday traffic analysis to the 36 arbitrarily selected locations addressed in the DEIR. In fact, given the factors presented above (i.e., non-representative existing conditions data and the fact that LAX traffic generation is highest in the midday period), we believe that a truly conservative analysis would include all 183 intersections in the midday analysis.

At a minimum, review of DEIR Figure 4.12.2-1 – Traffic Study Intersections (DEIR p. 4.12-55) and the existing conditions level of service (LOS) results presented in DEIR Table 4.12.2-6 (DEIR pp. 4.12-63 – 4.12-71) reveals a number of additional midday analysis candidate locations, each of which is also "adjacent to or in the vicinity of the Project site." Furthermore, each operates at LOS D or worse in either or both of the AM and PM peak hours, which is a reasonable indicator that it might operate poorly in the midday peak hour, as well. The additional midday study intersections are as follows:

- Intersection 21: Lincoln Boulevard/83rd Street (LOS F – AM)
- Intersection 69: Sepulveda Boulevard/Grand Avenue (LOS D – AM & PM)
- Intersection 70: Sepulveda Boulevard/El Segundo Boulevard (LOS D – AM & LOS E – PM)
- Intersection 71: Sepulveda Boulevard/Rosecrans Avenue (LOS E – AM & LOS F – PM)
- Intersection 88: Douglas Street/El Segundo Boulevard (LOS D – PM)
- Intersection 98: Aviation Boulevard/West 120th Street (LOS D – AM)
- Intersection 99: Aviation Boulevard/El Segundo Boulevard (LOS D – AM & LOS E – PM)
- Intersection 100: Aviation Boulevard/Rosecrans Boulevard (LOS E – AM & PM)
- Intersection 126: La Cienega Boulevard/West 120th Street (LOS D – PM)
- Intersection 127: La Cienega Boulevard/El Segundo Boulevard (LOS D – PM)
- Intersection 131: I-405 Northbound Ramps/Imperial Highway (LOS D – PM)
- Intersection 136: Inglewood Avenue/Century Boulevard (LOS D – PM)
- Intersection 137: Inglewood Avenue/Lennox Boulevard (LOS D – AM & LOS E – PM)
- Intersection 138: Inglewood Avenue/Imperial Highway (LOS E – AM & LOS F – PM)

To fully reflect the traffic patterns at LAX and to provide a comprehensive evaluation of the potential impacts of the proposed project, the midday traffic impact analysis must be revised to include these additional study intersections. The revised analysis should then be incorporated into a revised DEIR, which must be circulated for additional public review.

**Response:** The commentor's assertion that the study area for mid-day analysis presented in the Traffic Study for the proposed Project is inadequate is incorrect. Contrary to the commentor's assertion, the 36 mid-day traffic analysis locations were not "arbitrarily selected." The following key points, as noted in Chapter 1 in Appendix O of the Draft EIR, are provided to highlight the process for systematic selection of mid-day peak analysis locations as well as the geographic scope of these locations:

1. The Airport traffic currently peaks during mid-day peak hours; however, the external street system experiences peak traffic conditions during the AM (morning) and PM (evening) commute peak hours with much larger traffic volumes and observed congestion than the mid-day peak hours. This includes the streets immediately adjacent to the Airport.

2. The mid-day peak hour analysis locations were chosen based on proximity to the proposed Project including LAX and its facilities, where the proposed Project's effects would be realized and the potential significant traffic impacts would be captured.
3. At the time of developing and coordinating the scope of analysis, assumptions, parameters and methodology with the Technical Committee (consisting of transportation engineering and planning representatives from Caltrans, SCAG, LADOT, and Metro), preliminary traffic forecasts during mid-day peak hours using the updated LAX travel demand forecasting model were developed, and intersections anticipated to potentially realize an increase in traffic volumes with implementation of the proposed Project were identified. Based on this review, the 36 intersection locations immediately adjacent to or in the vicinity of the proposed Project were chosen for analysis.

Finally, vehicular trips disperse as individuals travel farther away from the Project site given the different origins and destinations for individual drivers. The adequacy of the geographic scope was ensured based on the fact that the boundary locations where mid-day traffic volume changes due to the proposed Project did not reveal significant traffic impacts under the Baseline (2015) With Project, Future (2024) With Project, Future (2035) With Project, and Future (2035) With Project and Potential Future Related Development scenarios. Therefore, the traffic analysis in the Draft EIR adequately addresses traffic impacts during all peak hours, as described in detail in Appendix O of the Draft EIR. Based on the above analysis, adding additional mid-day study intersections would not change the significance conclusions reached in the Draft EIR's traffic impact analysis, and thus there is no need to add them to the EIR.

**LAMP-AL00012-5**

**Comment:** ***3. Obsolete Level of Service Calculation Procedures*** – DEIR p. 4.12-57 states:

> *For the City of Los Angeles study locations, including those shared with other jurisdictions, the Critical Movement Analysis-Planning[1] (CMA) method of intersection capacity analysis was used to determine the intersection volume-to-capacity (V/C) ratio and corresponding level of service at the signalized study intersections.*

The footnote in the quote presented above clarifies that the intersection level of service calculations were performed using the Transportation Research Board "Circular 212" method. This methodology was published in a document entitled, *Interim Materials on Highway Capacity* (Transportation Research Board, Transportation Research Circular Number 212, January 1980). As referenced, the document was published in 1980, almost 27 years ago.

The purpose of "Circular 212" was to provide a set of procedures to supplement the 1965 version of the *Highway Capacity Manual* until such time as a fully-updated manual could be published. Such an updated manual was distributed to the traffic engineering profession in 1985. Since that time, additional updated manuals have been published in 1994, 1997, 2000, and the year 2010. Each of these revised versions of the *Highway Capacity Manual* has advanced the technical procedures associated with the analysis of transportation facilities, including intersections, roadway segments, and freeway facilities.

The introduction to the 1980 Circular 212 document addresses the anticipated life span of the procedures documented there, including the following statements:

- "The choice of a Transportation Research Circular as the publication medium has been quite deliberate. By definition, Circulars contain information of immediate interest but not necessarily of long-lasting value."

- ". . . the methods presented here can be put to use until such time as a revised Manual becomes available." [As noted above, that occurred in 1985, followed by subsequent revisions in 1994, 1997, 2000, and 2010.]
- "This report comprises the first set of interim materials which will be distributed prior to the publication of a new "Highway Capacity Manual" in the mid-1980s. These interim materials are intended for application by HCM users in the 1980-1982 period."

It is clear from these statements that the "interim" procedures documented in Circular 212 have long ago outlived their usefulness and have been superseded. Thus, their use in this analysis is inappropriate. To ensure the accuracy of the traffic analysis, the intersection level of service calculations must be performed using the current, year 2010 version of the *Highway Capacity Manual*. (Reference: Transportation Research Board, *Highway Capacity Manual*, Fifth Edition, December 2010.)

In that regard, we note that the analyses of stop-sign-controlled intersections were performed using the 2010 *Highway Capacity Manual* procedures, as were the analyses of facilities under the jurisdiction of Caltrans.

**Response:** The Draft EIR's methodologies for LOS analysis are accepted as reasonable and accurate by Project area jurisdictions. As noted in Section 4.12.2.2.2 of the Draft EIR, the CMA-Planning method of intersection capacity analysis was used at all City of Los Angeles locations, per the City of Los Angeles Department of Transportation (LADOT) Traffic Study Policies and Procedures,[1] and further coordinated with LADOT staff. For locations within the City of Culver City, City of Inglewood, City of El Segundo, City of Hawthorne, City of Manhattan Beach and County of Los Angeles, the Intersection Capacity Utilization (ICU) method of intersection capacity analysis was used, per the various jurisdictions' requirements. At the un-signalized intersections (3), as well as at locations within Caltrans jurisdiction (46), the Highway Capacity Manual (HCM) 2010[2] method intersection capacity analysis was used in the traffic study, per Caltrans study requirements.[3] The scope, assumptions, parameters and methodology for the study was coordinated with all jurisdictions within the traffic study area, at the commencement of the study.[4] Furthermore, the California Government Code expressly acknowledges that "Circular 212" is an acceptable methodology. (Gov. Code § 65089(b)(1)(A).) The 2010 Los Angeles County Congestion Management Program (the currently applicable "CMP" for the County) also explains that "During development of the CMP, available methodologies for determining LOS were discussed with local traffic engineering representatives through a highway working group who confirmed that a variety of methods were used by jurisdictions around the county. *These include Circular 212*…(emphasis added)"[5] In fact the 2010 CMP requires the City to utilize Circular 212. (2010 CMP Section D.8.) The Circular 212 is also used to this date by numerous jurisdictions, including Los Angeles County (See 2015 Draft EIR for the Earvin "Magic" Johnson Recreation Area Master Plan).[6] See also June 2016 Draft EIR prepared for the Burbank Bob Hope International Airport.[7]

In addition to specifically requiring projects to use the CMA methodology, the LADOT has developed refinements to the methodology to increase its accuracy. The comment does not recognize that the Draft EIR traffic impact analyses used these refinements. For example, LADOT has developed an Excel-based program that implements the methodology including specific allowances and protocol for use with certain operational characteristics at intersections such as 'overlap', 'right-turn-on-red (RTOR)', and 'protected-permissive, permissive, protected and spilt-phase' operations. Additionally, for very closely-spaced intersections and at intersections with large number of pedestrian crossings, a reduction in capacity is recommended within the LADOT software to more realistically provide consistent analysis results that can be used for comparison between scenarios and assess traffic impacts. The benefits of Automated Traffic Surveillance and Control (ATSAC) System and Adaptive Traffic Control System (ATCS) are implemented in

LADOT's CMA software. These location-specific parameters are not all available within the Highway Capacity Manual (HCM) 2010 procedures, thus using HCM 2010 procedures would not accurately reflect location-specific parameters.

Further, it is worth noting that at the Caltrans locations where the intersections are shared with the City of Los Angeles, both HCM 2010 and CMA analyses were performed. It was observed that the analysis using the two methods yielded similar results at these locations notwithstanding the specific parametric differences between the two methods (see Appendix S of Appendix O, Off-Airport Traffic Study, of the Draft EIR).

Based on the above, the Draft EIR's methodologies for LOS analysis were appropriate, reasonable, and accurate.

[1] Los Angeles Department of Transportation, Traffic Study Policies and Procedures, August 2014.

[2] Transportation Research Board, Highway Capacity Manual, 2010.

[3] State of California, Department of Transportation, Caltrans, Guide for the Preparation of Traffic Impact Studies, December 2002.

[4] California Department of Transportation (Caltrans), Letter from to DiAnna Watson, Branch Chief, District 7, to Lisa Trifiletti, Los Angeles World Airports, RE: Assumptions and Methodology Memo, Los Angeles International Airport (LAX) Landside Access Modernization Program (LAMP), Reference: IGR #150901DW, October 26, 2015; Raju Associates, Inc., Technical Memorandum Landside Access Modernization Program (LAMP) Project EIR Assumptions and Methodology for Traffic Study to Technical Steering Committee, August 30, 2015; Raju Associates, Inc., Memorandum Clarifications of Assumptions and Methodology Memorandum LAX Landside Access Modernization Program Project to Diana (sic) Watson, Caltrans District 7, August 30, 2015; Raju Associates, Inc., Technical Memorandum Landside Access Modernization Program (LAMP) Project EIR Assumptions and Methodology for Traffic Study to the City of El Segundo, November 30, 2015; Raju Associates, Inc., Technical Memorandum Landside Access Modernization Program (LAMP) Project EIR Assumptions and Methodology for Traffic Study to the City of Inglewood, October 27, 2015; Raju Associates, Inc., Technical Memorandum Landside Access Modernization Program (LAMP) Project EIR Assumptions and Methodology for Traffic Study to the City of Culver City, December 1, 2015.

[5] Los Angeles County Metropolitan Transportation Authority, 2010 Congestion Management Program, Section 2.4.2, October 2010, Available: http://media.metro.net/projects_studies/cmp/images/CMP_Final_2010.pdf.

[6] Los Angeles County, Department of Parks and Recreation, Draft Environmental Impact Report for Earvin "Magic" Johnson Recreation Area Master Plan, Section 4.13, Transportation and Circulation, September 2015, Available**:** http://file.lacounty.gov/SDSInter/dpr/233256__04.13TransportationandCirculation_.pdf.

[7] RS&H, Inc., Environmental Impact Report for a Replacement Airline Passenger Terminal at Burbank Bob Hope Airport, Volume 5, Final, June 2016, Available: http://www.burbankca.gov/home/showdocument?id=36058.

**LAMP-AL00012-6**

**Comment:** 4. ***Inconsistent On-Airport and Off-Airport Traffic Analyses*** – The DEIR presents separate analyses of the on-airport and off-airport transportation systems. It is not clear, however, that those two analyses are consistent with each other, which leads to questions regarding the validity of the results of those analyses. Particular areas of concern are delineated below.

**Analysis Day**

For the on-airport analysis:

> *Friday was selected as the design day as it is typically the busiest overall day of the week for the Airport roadway system. (DEIR p. 4.12-3)*

Although the off-airport analysis text does not explicitly say so, that analysis was based on conditions during the mid-week period (Tuesday through Thursday), which represents the usual method for conducting traffic impact analyses. Evaluation of traffic operations outside the Tuesday through Thursday period is generally not undertaken, because those circumstances might be atypical. The classic example used to illustrate this point relates to the fact that "Black Friday" conditions are not considered in analyzing the traffic impacts of a regional shopping center.

This case is different, though, as Friday happens every week, not just once a year. Also, because LAX is the dominant generator of traffic in the study area, it deserves special consideration. As noted in DEIR Table 4.12.1-2 (DEIR p. 4.12-11), LAX generated average daily traffic of 75,690 vehicles per day in the year 2014. Further, DEIR Table 4.12.2-4 (DEIR p. 4.12-61) shows that it generated over 12,300 AM peak hour trips, almost 16,100 midday peak hour trips, and 12,840 PM peak hour trips. It is unlikely that any other nearby land use generates such substantial traffic volumes.

Limiting the traffic impact analysis to the Tuesday through Thursday period is a guideline and not a requirement. Flexibility is accorded the lead agency in choosing the analysis periods. For consistency between the on-airport and off-airport traffic analyses, as well as to ensure a thorough analysis of potential traffic impacts, the analysis must address Friday "design day" conditions, as defined in the on-airport analysis.

**Analysis Hours**

The on-airport traffic analysis addressed the following peak hours (DEIR p. 4.12-18):

- Peak arrivals: 8:18 – 9:18 PM, and
- Peak departures: 6:16 – 7:16 AM.
- The "peak arrivals" hour also represents the peak overall hour (i.e., arrivals and departures combined).
- The off-airport analysis addressed the following time periods:
- AM peak hour: Highest hour between 7:00 and 10:00 AM,

- Midday peak hour (reduced study area): Highest hour between 11:00 AM and 2:00 PM, and
- PM peak hour: Highest hour between 3:00 and 6:00 PM.

The fact that the off-airport analysis addresses off-peak hours at LAX raises the distinct possibility that not all of the potentially significant impacts will be identified.

**Travel Demand Forecasting Models**

The on-airport traffic analysis for future year conditions was based, in part, on:

> *A vehicle trip generation and distribution model [that] was developed to estimate future traffic volumes on the Airport's roadway system based on future passenger activities. (DEIR p. 4.12-3)*

The off-airport traffic analysis apparently based its future year projections on a different travel demand forecasting model, as described below:

> *Utilizing TransCAD Version 7.0 modeling software, a detailed and updated travel demand forecasting model (updated City of Los Angeles Travel Demand Model) was developed for the Study Area using the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) 2012 Transportation Model (the most current regional model available at the time this Draft EIR was being prepared) and the calibrated and validated City of Los Angeles' Travel Demand Model as the base. (DEIR p. 4.12-59)*

No evidence is provided to indicate that any coordination occurred between the developers of the two models. Of particular interest is the question of what happens where the on-airport and off-airport study areas meet. Do the peak-hour traffic projections for the years 2024 and 2035 match? If not, why not? This information is needed to ensure that the traffic forecasts employed in both analyses are credible.

**Summary**

The lack of consistency between the on-airport and off-airport traffic analyses raises questions regarding the validity and credibility of the analyses, particularly with regard to the off-airport evaluation. The on-airport study is generally focused on historical design hours and days at LAX, based on extensive data collection at that facility. On the other hand, the off-airport analysis focuses on analysis procedures that, while considered "standard" in the traffic engineering profession, do not necessarily fully address traffic operations at LAX. As demonstrated above, the approach employed in the off-airport analysis reflects levels of activity that fall far short of "peak" conditions (despite being labeled "peak hours") and, as a result, significant traffic impacts might be missed.

**Response:** The on-Airport and off-Airport traffic analyses presented in Sections 4.12.1 and 4.12.2 of the Draft EIR, respectively, are consistent in all important respects. The on-Airport traffic analysis includes analyses of intersections and segments within the CTA that are affected by LAX trips only. The design day analyzed for the CTA roadway system traffic impact analyses presents a conservative evaluation of traffic operations under baseline (2015), future (2024) and future (2035) conditions with and without the proposed Project.

The off-Airport traffic analysis includes analyses of intersections and freeway segments on the off-Airport roadway system that provides access and circulation opportunities to not only the traffic associated with LAX and its facilities, but also the regional traffic using the system. The off-Airport roadway system analyzed in Section 4.12.2 of the Draft EIR is part of a core framework of

the regional and sub-regional highway network that serves regional traffic using the system. While the peak conditions on the on-Airport roadways are entirely dependent on peak passenger activity levels at the Airport (represented by vehicle traffic generation on a design day in summer), the cumulative peak conditions on the off-Airport roadway system occur on a non-summer commuter weekday during the AM and PM peak hours (represented by the vehicle trip generation associated with the activity levels at LAX and its facilities and the activity associated with regional generators). These conditions were presented to and recognized by the Technical Committee (consisting of expert transportation engineering and planning representatives from Caltrans, SCAG, LADOT, and Metro) that concurred with the assumptions, parameters, methodology and the different models used in the Traffic Study.

The commentor refers to the travel demand forecasting models used in the on-Airport and off-Airport traffic analyses as though they were entirely separate processes used independent of each other. This notion is incorrect, since the trip generation of LAX and its facilities reflected in the special generator trip tables in the off-Airport travel demand forecasting model (as documented in detail in Appendix D, Model Documentation, of the Appendix O of the Draft EIR) utilized the on-Airport vehicle trip generation and distribution model to obtain the passenger-related vehicle trip generation as input to the off-Airport traffic model's special generator trip table development. The off-Airport travel demand forecasting model (utilizing the on-Airport vehicle trip generation and distribution models in the development of special generator trip tables) was utilized in the development of forecasts at all off-Airport intersections, and freeway segments and ramps for the various scenarios detailed in the Traffic Study. In other words, the off-Airport travel demand forecasting model utilized the on-Airport vehicle trip generation and distribution models as a specific component of the overall forecasting chain of models used in the study.

Additionally, the off-Airport traffic model utilized the traffic forecasted for the on-Airport roadway system peak hours and applied those to the peak hours identified for the off-Airport roadway system. Thus, the off-Airport traffic model analyzed the worst conditions; the peaks of the on-Airport roadway system with the peaks of the off-Airport roadway system regardless of whether they occurred on a Friday summer day (on-Airport) or commuter non-summer day (off-Airport). The peak hours analyzed the highest traffic volumes that could reasonably be anticipated to occur at the intersections within the Traffic Study area. Using Friday "design day" conditions, as the commentor suggests, would actually have resulted in a less conservative analysis with lower peak intersection volumes.

In summary, the on-Airport and off-Airport traffic analyses in the Draft EIR are consistent in all important respects. The analyses presented in the on-Airport and off-Airport components are conservative evaluations of traffic impacts of the proposed Project on the on-Airport and off-Airport roadway system, respectively, as documented in the on-Airport and off-Airport traffic analyses in Sections 4.12.1 and 4.12.2 of the Draft EIR.

**LAMP-AL00012-7**

**Comment:** 5. ***Inadequate Transit Analysis*** – The difficulties faced by individuals who desire to use public transit to access LAX are described at DEIR p. 1-2:

> *Moreover, LAX also lacks a direct connection to the Los Angeles County Metropolitan Transportation Authority (Metro) transit system. Currently, passengers and employees who want to take public transportation to LAX must either take a bus (often requiring a transfer from the LAX City Bus Center on W. 96th Street to the LAWA operated Lot C shuttle to reach the CTA), or take the Metro Green Line light rail to the station at Imperial Highway and Aviation Boulevard. They must then transfer to the LAWA- operated G shuttle to the Airport, which is a trip of approximately 2 miles.*

These constraints might lead one to believe that consideration of transit impacts and potential improvements to the transit system serving LAX would be important. The extremely limited, one-paragraph "analysis" of the proposed project's impacts on the regional transit system suggests otherwise. (DEIR p. 4.12-153) The analysis presented there states, in part:

> *Given that the Project consists of roadway and transportation improvements and construction of facilities that would facilitate movement of passengers at LAX . . ., the Project would not generate any additional new trips. . . . The proposed Project would improve connections to the regional transit system, which may encourage passengers and employees to utilize transit rather than other modes of traffic. Therefore, impacts to transit would be less than significant.*

First, we note the absolute lack of any analysis that might serve as a credible basis for a finding of a "less than significant" impact. We also find it ironic that the claim that the proposed Project "may encourage passengers and employees to utilize transit" is apparently used as the basis for determining that the transit impact will be less than significant.

The threshold of significance for transit is presented at DEIR p. 4.12-95:

> *. . . a significant impact is considered to occur if implementation of the proposed Project would result in a substantial increase in transit demand compared to the capacity of transit lines serving the project area.*

No information is provided with respect to current or project-related transit demand. Further, no data are presented to demonstrate whether adequate capacity exists (or will exist in the future) on the various transit lines that serve LAX. (Of course, this relieves the burden of having to determine what constitutes a "substantial" increase in transit demand.)

Finally, we note that Mitigation Measure "MM-ST (LAMP)-6. Transportation Demand Management (TDM) Program" (DEIR p. 4.12-179) specifically includes provision of transit passes to LAX employees. This feature of the TDM program can be expected to increase transit ridership, potentially impacting the transit lines serving LAX.

Under the circumstances, the absence of a meaningful analysis of existing and future transit capacity and the effect of the proposed project on that available capacity (if any) is a substantial deficiency in the DEIR. Further detail must be provided and incorporated into a revised DEIR.

**Response:** The commentor first quotes language from the introduction of the LAX Landside Access Modernization Program Draft EIR on page 1-2 which describes *existing conditions* and then uses that as a basis for concluding that impacts may be significant. Existing environmental issues which are part of baseline conditions are not environmental impacts of the proposed Project. (State CEQA Guidelines Section 15126.2(a); *Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1094 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"].)

While the Draft EIR conservatively considered impacts associated with transit capacity, the state has implemented a number of policies to encourage development in proximity of transit and to foster additional transit use to reduce environmental impacts. (See Senate Bill 375; see also the SCAG 2016 Regional Transportation Plan, which includes expanding access to transit, and expressly includes policies "encouraging the development and use of transit access to the region's airports."[1]). Funding for transit use and expansion is provided from a number of locations, including federal and state funding, regional sales tax, as well as from ridership (as

ridership goes up, funding increases as well from increased ticket sales). However, transit funding is not an environmental impact; it is an economic issue. (State CEQA Guidelines 15131.)

Nevertheless, impacts to transit capacity would be less than significant. The proposed Project has been designed in coordination with Metro's "Airport Metro Connector 96th Street Transit Station" Project, which includes a certified Final EIR. (SCH No. 2015021009.)[2] As noted in that Draft EIR, Metro and LAWA worked collaboratively to develop the transit connection. Metro's project has been specifically designed with the goal of "increas[ing] transit ridership and provid[ing] a reliable and convenient transit option to and from LAX along with the regional bus and rail transit system [and to] Increase the share of transit trips to and from LAX…to help reduce air pollution." (Metro EIR, Section 2.3.1.) The proposed Metro project includes new transit facilities to cater to demand at LAX, including three at-grade Light Rail Transit (LRT) platforms, a bus plaza and terminal facilities for Metro and municipal bus operators, a bicycle hub with secured parking, a pedestrian plaza, passenger vehicle pick-up and drop-off area, and a Metro transit center/terminal building that connects passengers between the various modes of transportation, which is funded by Measure R funds. The Airport Metro Connector 96th Street Transit Station Project is included in Metro's 2009 Long Range Transportation Plan and the Measure R Expenditure Plan to finance new transportation projects and programs. Metro concluded that the connector has "the capacity to accommodate both the existing and future passengers presently using the LAX City bus center and the Aviation/LAX transit center…[and]…will be capable of handling the consolidated bus service with room for expanded frequency or additional lines in the future" and concluded that impacts to transit would be less than significant. (Metro EIR, pp. 3.6-28 through 29.) This expressly included cumulative growth outlined in the LAX Landside Access Modernization Program Draft EIR. (Metro Final EIR, Response 2-12.)

In addition, Chapter VII in Appendix O of the Draft EIR provides additional transit information. Table 5 in Appendix O provides details of existing transit serving the study area including the following:

- Provider name
- Line number
- One-way route length
- Average daily riders
- Service area
- Direction
- Service type
- Hours of operation
- AM / MD / PM peak hours' frequency of service

Figure 9 in Appendix O presents the various transit lines within the Project vicinity. Chapter II in Appendix O provides a detailed description of existing transit service including the Metro LAX/Crenshaw Light Rail Transit line under construction.

The following information is included, consistent with the CMP:

- Evidence that affected transit operators received the NOP (Distribution list can be found in the Draft EIR)

- Existing transit service in the Study Area (provided in Chapter II of Appendix O)
- Project trip generation estimates (described in Chapter VII of Appendix O)
- Project transit trip estimates (described in Chapter VII of Appendix O)
- Project components to encourage transit use (described in Chapter III of Appendix O, including connections to Metro's LAX/Crenshaw Line and the AMC Station; a TDM Program, including provision of an employee shuttle program described in Chapter VI of Appendix O)
- Analysis and Mitigation (described in Chapter VII of Appendix O), as further enhanced in the additional transit analysis presented in the Final EIR, included in Chapter 3, Corrections and Additions, and summarized below:

Table 3 below summarizes the transit impact analysis associated with all transit routes serving LAX and its vicinity as shown in Table 5 of Appendix O. The table evaluates and summarizes key elements used in transit impact analysis such as the total daily ridership of all transit lines serving LAX and its vicinity, total available capacity of all these transit routes, average daily ridership to capacity ratios and whether residual capacity would be available under the following scenarios - Existing conditions without and with the proposed Project, Future (2024) conditions without and with proposed Phase 1 Project and Future (2035) conditions without and with the buildout of the proposed Project.

It can be observed from Table 3 that the existing average daily route ridership of all routes serving LAX and its vicinity is approximately 115,546 riders with residual capacity available throughout the day. With the proposed Project in place, the average daily ridership is estimated to increase to 117,545 riders; however, there would continue to be adequate capacity available on a daily basis with the proposed Project. Therefore, transit impacts due to the Project would be less than significant under the Existing with Project scenario because there would no substantial increase in transit demand compared to capacity of transit lines serving the Project area.

Similarly, the Future (2024) without Project average daily ridership is projected to be 139,093 riders with residual capacity available. With the proposed Phase 1 Project in the Future Year 2024, the average daily ridership is projected to increase to 141,235 riders; however, there would continue to be adequate capacity available on a daily basis. Therefore, transit impacts due to Phase 1 of the Project would be less than significant because there would no substantial increase in transit demand compared to capacity of transit lines serving the Project area.

The table also presents the Future (2035) without Project average daily ridership to be 151,804 riders with residual capacity throughout the day. With buildout of the proposed Project in 2035, the average daily ridership is projected to increase to 154,310 riders. However, adequate transit capacity would continue to be available even with the overall proposed Project in place, and consequently, no significant transit impacts would occur because there would no substantial increase in transit demand compared to capacity of transit lines serving the Project area.

The proposed Project is a transportation improvement project involving provision of consolidated facilities connected to and from the CTA by an APM system offering time-certain travel and roadway improvements. With the Project, as shown in Tables 19-21 of Appendix O, the net vehicular trip generation during peak periods would be reduced in comparison to conditions without Project. Since the proposed Project would encourage transit usage, provide connectivity to the regional transit and multi-modal hub and provide improvements as part of the TDM Program including possibly an Employee Shuttle Program (See Appendix O, Chapter VI for more detail), increase in transit ridership is anticipated. The analysis presented above includes the potential increase in transit ridership due to the proposed Project and its effects on the transit system. In summary, the proposed Project would not increase transit demand to the extent that

transit capacity available in the system providing service to LAX and its vicinity would be exceeded and therefore, no significant transit impacts would occur.

**Table 3**

**Transit Impact Analysis**

| | Average Daily Route Ridership (All Routes)* | Daily Capacity for All Routes* | Average Daily Ridership to Capacity | Residual Capacity Available |
|---|---|---|---|---|
| Existing Conditions - Transit System* Total | 115,546 | 357,200 | 0.32 | Yes |
| Existing with Project Conditions - Transit System* Total | 117,545 | 357,200 | 0.33 | Yes |

* Includes all routes serving LAX and its vicinity as shown in updated (corrections/additions) Table 5 of Appendix O - Draft Transportation Study. However, for the purposes of this analysis, the route capacities associated with the APM system and /or employee shuttle program have not been included, conservatively, although the anticipated regional transit ridership utilizing these project provisions are included in the daily ridership estimates.

| | Average Daily Route Ridership (All Routes)* | Daily Capacity for All Routes* | Average Daily Ridership to Capacity | Residual Capacity Available |
|---|---|---|---|---|
| Future (2024) without Project - Transit System* Total | 139,093 | 393,815 | 0.35 | Yes |
| Future (2024) with Phase 1 Project - Transit System* Total | 141,235 | 393,815 | 0.36 | Yes |

* Includes all routes serving LAX and its vicinity as shown in updated (corrections/additions) Table 5 of Appendix O - Draft Transportation Study and the future Metro Crenshaw/LAX Line LRT. However, for the purposes of this analysis, the route capacities associated with the APM system and /or employee shuttle program have not been included, conservatively, although the anticipated regional transit ridership utilizing these project provisions are included in the daily ridership estimates.

| | Average Daily Route Ridership (All Routes)* | Daily Capacity for All Routes* | Average Daily Ridership to Capacity | Residual Capacity Available |
|---|---|---|---|---|
| Future (2035) without Project - Transit System* Total | 151,804 | 393,815 | 0.39 | Yes |
| Future (2035) with Project - Transit System* Total | 154,310 | 393,815 | 0.39 | Yes |

* Includes all routes serving LAX and its vicinity as shown in updated (corrections/additions) Table 5 of Appendix O - Draft Transportation Study and the future Metro Crenshaw/LAX Line LRT. However, for the purposes of this analysis, the route capacities associated with the APM system and /or employee shuttle program have not been included, conservatively, although the anticipated regional transit ridership utilizing these project provisions are included in the daily ridership estimates.

[1] Southern California Association of Governments, Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life, Adopted April 7, 2016, Available: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf.

[2] Los Angeles County Metropolitan Transportation Authority (Metro), Airport Metro Connector 96th Street Transit Station Draft Environmental Impact Report, June 2016, and Final Environmental Impact Report, November 2016,Available: https://www.metro.net/projects/lax-extension/amc-96th-st-deir/ (Draft EIR) and https://www.metro.net/projects/lax-extension/amc-96th-st-feir/ (Final EIR). The Final EIR was certified on December 1, 2016: Los Angeles County Metropolitan Transportation Authority (Metro), "First Measure M Project; Metro Rail Connection to LAX Metro Board Certifies Final EIR for Airport Metro Connector 96th Street Transit Station, December 1, 2016, Available: https://www.metro.net/news/simple_pr/first-measure-m-project-metro-rail-connection-lax-/.

**LAMP-AL00012-8**

**Comment:** 6. ***Deficient Construction Traffic Analysis*** – The construction traffic analysis study area is substantially reduced from that addressed in the other traffic analyses. According to DEIR p. 4.12-194:

> *The construction traffic study area for this analysis includes those roads and intersections that would most likely be used by employee and truck traffic associated with construction of the proposed Project.*

In reality, though, the study area, as illustrated at DEIR Figure 4.12.3-1 (DEIR p. 4.12-195), barely extends beyond the boundaries of LAX. The apparent suggestion is that none of the construction traffic will travel east of La Cienega Boulevard, south of Imperial Highway or Interstate 105, or north of Westchester Parkway.

The analysis time periods are presented at DEIR p. 4.12-209. The AM peak hour is defined as 7:00 - 8:00 AM, while the PM peak hour is described as 4:00 - 5:00 PM. For both peak-hour periods:

> *The construction traffic analysis assumed that no employee trips would be on the roadways at this time. . . . This approach provides a conservative impact analysis by addressing situations when complete avoidance of the morning [or evening] commuter peak period is not possible.*

It is not at all clear how ignoring the traffic associated with 966 construction employees constitutes a "conservative" analysis. (DEIR, p. 4.12-213) In fact, referring to DEIR Table 4.12.3-4 (DEIR p. 4.12-215), we see that the assumed analysis hours just miss having to assess the impacts of over 520 employee-generated trips. For clarity, we have replicated a portion of that table below, as Table 2.

In the morning, the DEIR indicates that 523 employee vehicles will arrive between 6:00 and 7:00 AM, along with a total of 162 truck trips, for a total traffic volume of 685 trips. But the analysis addresses the following hour (7:00 – 8:00 AM), when no employees are assumed to arrive and the total traffic volume is only 162 trips, about one-quarter as many as between 6:00 and 7:00 AM. It is also interesting to note that, although they are specifically listed on the table, no "employee shuttle" trips are assumed.

In the evening, the analysis addressed the hour between 4:00 and 5:00 PM (i.e., 16:00 – 17:00) when only truck traffic is assumed to occur (162 trips). If the previous hour had been considered, the traffic total would be 685 trips, including 523 departing employees and 162 truck trips (81 in and 81 out). Again, no employee shuttle trips are shown in any hour.

The employee trip values in Table 2 are based largely on a number of assumptions regarding how construction workers will be scheduled. Given the uncertainties inherent in developing such assumptions, we believe that a truly conservative analysis would only result from evaluation of the adjacent hours, which have higher estimated construction employee traffic volumes.

Further, we note that the same deficiencies described here also afflict the construction traffic analysis for cumulative conditions, which is documented at DEIR pp. 4.12-219 – 4.12-229.

**Table 2**

**Proposed Project-Related Construction Traffic PCEs[1,2]**

| Hour | Employee | | Truck | | Employee Shuttle | | Total Construction PCEs |
|---|---|---|---|---|---|---|---|
| | Trips In | Trips Out | Trips In | Trips Out | Trips In | Trips Out | |
| 6:00 – 7:00 | 523 | -- | 81 | 81 | -- | -- | 685 |
| **7:00 – 8:00[3]** | **--** | **--** | **81** | **81** | **--** | **--** | **162** |
| 8:00 – 9:00 | 57 | -- | 81 | 81 | -- | -- | 219 |
| 14:00 – 15:00 | 154 | -- | 81 | 81 | -- | -- | 316 |
| 15:00 – 16:00 | -- | 523 | 81 | 81 | -- | -- | 685 |
| **16:00 – 17:00[3]** | **--** | **--** | **81** | **81** | **--** | **--** | **162** |

Notes:

[1] Source: DEIR, Table 4.12.3-4 – Project Peak (January 2020) – Proposed Project-Related Construction Traffic PCEs, p. 4.12-215.

[2] PCE = Passenger Car Equivalent (Reflects conversion of truck numbers to indicate an equivalent number of passenger cars, based on operational considerations.)

[3] Analysis hours assumed for DEIR construction traffic analysis are shown in **bold** font and highlighted in yellow.

The non-conservative nature of the construction traffic analysis is further revealed through examination of the tables providing the intersection level of service results. DEIR Table 4.12.3-7 summarizes these results for the peak construction period (January 2020). According to that table, of the 58 calculations presented (i.e., 29 intersections analyzed for the AM and PM peak hours), 44 (76 percent) indicated no change in volume/capacity (V/C) ratio due to construction traffic, with the calculations carried out to three decimal places. In other words, no construction-related traffic was added to those intersections. A significant impact was found at only one intersection – Aviation Boulevard/Century Boulevard.

The cumulative conditions analysis (November 2019), as documented in DEIR Table 4.12.3-8 (DEIR p. 4.12-235) had one additional calculation for which the V/C ratio increased by 0.000. In other words, 45 of the 78 calculations listed on that table showed no increase in V/C, which indicates that no construction traffic was added to the intersection. (The traffic volumes for the construction traffic analysis are not presented in the DEIR, so it is impossible to confirm this.) In this case, three intersections were found to have significant impacts – Aviation Boulevard/ Century Boulevard, Imperial Highway/Aviation Boulevard, and Imperial Highway/I-105 Ramp.

Analyses were conducted for the significantly impacted intersections to determine the effects of implementing recommended mitigation measures. Not surprisingly, perhaps, those analyses concluded that the proposed measures would fully mitigate the construction impacts. That is, the change in V/C ratio after mitigation would be 0.000. It is not clear exactly how that is to be accomplished, given the list of mitigation measures (e.g., formation of a Project Task Force, development of Worksite Traffic Control Plans, etc.), which would generally have little or no effect on construction traffic volumes.

Since the only construction traffic that was considered in the analysis is truck traffic, it would seem reasonable to expect that the mitigation measure outlining designated truck routes might be effective, but the roads listed there include those having significant impacts – Aviation Boulevard, Century Boulevard, Imperial Highway, and I-105. Another proposed measure calls for establishing designated truck delivery hours, but the description of that measure is so full of

loopholes (in particular, repeated use of the phrase "to the extent possible") that it might have no effect whatsoever.

These results are simply not credible. The construction traffic analysis must be revised to reflect more conservative, more realistic consideration of the potential effects associated with almost 1,000 construction workers and the trucks necessary to carry out the proposed project. As illustrated in Table 2 above, it is difficult to avoid the conclusion that the construction traffic analysis hours were arbitrarily selected to avoid impacts. Additional detail is also needed with respect to the specific beneficial effects of the proposed mitigation measures.

**Response:** As discussed in Responses to Comments LAMP-AL00008-34 and LAMP-AL00008-35, the study area for the construction surface transportation analysis, as discussed in Section 4.12.3.3.2 of the Draft EIR, is appropriate for capturing proposed Project impacts. The geographic scope of the construction traffic study area was determined by identifying the intersections most likely to be used by construction-related vehicles accessing a.) the proposed Project construction site, construction employee parking areas, and delivery staging areas and b.) the construction employee parking and staging areas for other concurrent construction projects in the vicinity of LAX. Construction delivery vehicle travel paths would be regulated according to the construction traffic management plan detailed in Section 4.12.3.8. Furthermore, the construction-related trips are comprised of three sources of traffic that affect the off-Airport roadway system consisting of truck delivery trips, construction employee trips, and shuttle bus trips required to transport employees to/from their assigned parking areas to their construction site. In accordance with the travel paths described in Section 4.12.3.8 (see Mitigation Measure MM-ST (LAMP)-1), truck delivery trips will be required to use the freeway system to access the Airport. As a result, these truck trips would have no effect within the study area except those in the direct route between the freeway terminus points and the staging areas. Additionally, given the numerous trip types associated with different uses on the Airport, the coverage required for intersection analysis associated with operational traffic impacts is more extensive than for a temporary scenario such as construction traffic. For the reasons described above, it is appropriate to use different study areas for the off-Airport surface transportation analysis in Section 4.12.2 of the Draft EIR and the construction surface transportation analysis in Section 4.12.3 of the Draft EIR.

As stated in Section 4.12.3.3, the analysis time periods were based on those hours at the start of the AM and PM commuter peak periods, which were defined as 7:00 AM to 8:00 AM (AM Peak) and 4:00 PM to 5:00 PM (PM Peak). Furthermore, a construction schedule was developed to estimate the shift times to be implemented during the Project, which vary based on the type and location of construction. Shift times were established to avoid the commuter peak hours in order to limit the impact of construction vehicles on the roadway network. As stated in Section 2.6.1, APM guideway and station components that would be located within the CTA would be constructed over an 18 hour/day schedule with two shifts. The "night" shift would occur from approximately 1 a.m. to 9 a.m., the "day" shift would occur from approximately 9 a.m. to 7 p.m., and minimal construction would occur between 7 p.m. and 1 a.m. Approximately 65 percent of the CTA APM construction activity would occur during the 8-hour night shift and 35 percent would occur during the 10-hour day shift. Remaining Project construction activity would occur during two 8-hour shifts/work day (16 hours/day): a morning shift from approximately 7 a.m. to 3 p.m., and an evening shift from approximately 3 p.m. to 11 p.m. For construction of the APM guideway outside of the CTA, approximately 60 percent of construction would occur during the morning shift and 40 percent during the evening shift. For construction of all other elements (excluding the APM guideway), approximately 80 percent would occur during the morning shift and 20 percent during the evening shift. Based on these shift times, which would be included in the CTMP, reviewed by the Project Task Force, and enforced by the contractor, it was estimated that no employee traffic would be on the roadways during the start of the commuter peak periods as employees would be required to have either arrived or departed the staging lots outside of the

peak periods. The commentor also notes that no employee shuttle trips have been assumed. As stated in footnote 3 of Table 4.12.3-4 of the Draft EIR, "[e]mployee shuttles would not affect public roadways or intersections due to the location of the project construction site and the employee parking areas. In some cases, employee parking would occur in close proximity to the construction site; in other cases, employee shuttles would travel largely or exclusively on on-airport roadways."

The commentor also notes the number of intersections which calculate no change in volume to capacity (V/C) due to construction traffic, and attributes this to zero construction-related traffic being added to those intersections. As depicted in Table 4.12.3-4, during the analyzed hours of 7:00 AM to 8:00 AM and 4:00 PM to 5:00 PM, only haul truck traffic would be contributing trips to the roadway network. Considering the designated truck routes (as stated in Mitigation Measure MM-ST (LAMP)-1 in Section 4.12.3.8), traffic associated with the construction of the Project would be limited to specific study area intersections. Furthermore, as discussed in Section 4.12.3.3, intersection level of service (LOS) was analyzed using the Critical Movement Analysis (CMA) methodology to assess the estimated operation conditions. This method, also known as the Circular 212 Planning Method,[1] calculates the sum of the per-lane volumes for the critical movements and divides by an overall intersection capacity (V/C). Therefore, although traffic is being added to that particular intersection, a change of 0.000 can result from zero construction-related traffic being added to that intersection's respective critical movement(s). For example, the intersection of La Cienega Boulevard and Century Boulevard would experience an increase in traffic when comparing the Future Cumulative Without Project conditions to the Future Cumulative With Project condition, yet the change in V/C is 0.000. Detailed traffic volumes are presented in Appendix P.2 of the Draft EIR. Furthermore, the results of the impacts analysis with incorporation of mitigation presented in Table 4.12.3-10 of the Draft EIR, and the corresponding change in V/C after mitigation of 0.000 is a result of implementing MM-ST (LAMP)-1, detailed in Section 4.12.3.8. The contractor, in coordination with LAWA and the Project Task Force, shall alter the haul truck travel routes to other designated roadways, in order to avoid the impacted intersections, specifically the critical movement of the significantly impacted intersections. These routes would be specified in the CTMP and reviewed by LAWA prior to implementation.

Furthermore, as stated in MM-ST (LAMP)-1 in Section 4.12.3.8, to the extent possible, truck deliveries of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project site, and hauling of material from the Project site, shall be scheduled during off-peak hours to avoid the peak commuter and Airport traffic periods on designated haul routes. However, should complete avoidance of these hours not be possible, the analysis accounts for haul truck activity in the commuter peak hours; therefore, the analysis is considered to be conservative in nature. Additionally, implementation of MM-ST (LAMP)-1, and the altering of haul truck routes upon approval by the Project Task Force, the Project-related construction traffic LOS impacts on specific intersections would be reduced to a level that is less than significant and the proposed Project's contribution to significant cumulative impacts would not be cumulatively considerable, as shown in Tables 4.12.3-9 and 4.12.3-10.

[1] Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, January 1980.

**LAMP-AL00012-9**

**Comment:** Further consideration is also required with respect to the lane closures and other forms of traffic blockage that will occur for extended periods over the course of the construction process. The construction-related thresholds of significance include the following (DEIR pp. 4.12-230 – 4.12-231):

- Result in temporary lane, alley, or street closures within a major or secondary highway right-of-way for more than one day.
- Result in the loss of regular vehicular or pedestrian access to Airport, commercial, or industrial facilities for more than one day.
- Result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route.

DEIR p. 4.12-237 acknowledges that:

> Construction of the proposed Project could result in the closure of one or more lanes of a major off-Airport traffic carrying street for an extended length of time. . . . The proposed Project would also require the re-routing of buses, the relocation of the LAX City Bus Center, and the relocation of bus stops.

Although this is identified as a significant impact, no quantitative analysis is provided to indicate the true magnitude of the issue. In particular, where is this expected to occur? At locations where extended lane closures are anticipated, what will be the resulting vehicular delay and level of service in the AM and PM peak hours? Will there be additional safety impacts and crashes associated with the lane closures? What will be the effect on transit travel times? When bus stops are relocated, what will be the extent of the increase in walk access distance and time for transit passengers? Will it be sufficient to discourage transit usage?

In summary, the analysis of construction traffic impacts is deficient. The analysis appears to have been skewed to ensure that no impacts would occur, despite the arrival and departure of almost 1,000 construction workers in 523 vehicles/hour every day. In addition, more detail is necessary regarding the effects of lane closures that will occur over an extended period.

**Response:** Please see Responses to Comments LAMP-AL00008-34 and 36. As stated on page 4.12-237 of Section 4.12.3, Construction Surface Transportation, of the Draft EIR, to minimize impacts to the CTA roadway system and Airport operations during construction, the Project components located within the CTA would be constructed over an 18-hour/day schedule with two shifts. The "night" shift would occur from approximately 1 a.m. to 9 a.m. and the "day" shift would occur from approximately 9 a.m. to 7 p.m., with minimal construction occurring between 7 p.m. and 1 a.m. Approximately 65 percent of construction activity within the CTA would occur during the 8-hour night shift, when traffic levels are low, and 35 percent would occur during the 10-hour day shift. Delivery of construction materials would occur during the night shift, as would most lane closures. Construction activities during the day shift would largely consist of activities that could proceed without requiring lane closures or significantly disrupting Airport operations.

The majority of the construction activity associated with the proposed Project within the CTA would primarily occur along the Center Way corridor; thus, curbside impacts along World Way in front of the passenger terminals would be minimized. A portion of the vehicular traffic exiting the parking structures along Center Way would be detoured to use World Way South, which may cause some vehicle congestion along World Way South.

Contractors working within the CTA would be required to adhere to the restrictions noted above so that access to the CTA for passengers is maintained at all times, with minimal disruption.

As noted on page 4.12-237 of the Draft EIR, Project-related construction outside the CTA would require temporary lane closures and detours, particularly when roadway improvements to Century Boulevard, Airport Boulevard, Aviation Boulevard, Arbor Vitae Street, and W. 98th Street are constructed and when the APM guideway is constructed over existing streets. Figures 2-5

through 2-7 located in Chapter 2, Description of the Proposed Project, identify the locations of the proposed APM construction; Figures 2-41 through 2-43 identify the locations of the proposed roadway improvements. Construction-related impacts to the off-Airport surface transportation system could result in substantial congestion and inconvenience to motorists and pedestrians on a regular or frequent basis during these times (see Table 2-15 in Chapter 2, Description of the Proposed Project, of the Draft EIR). Construction activity outside of the CTA would occur during two 8-hour shifts/work day (16 hours/day): a morning shift from approximately 7 a.m. to 3 p.m., and an evening shift from approximately 3 p.m. to 11 p.m. For construction of the APM guideway outside of the CTA, approximately 60 percent of construction would occur during the morning shift and 40 percent during the evening shift. For construction of all other elements (excluding the APM guideway), approximately 80 percent would occur during the morning shift and 20 percent during the evening shift. To the extent feasible, most lane closures would occur during off-peak and evening hours. Construction activities during the day shift would largely consist of activities that could proceed without requiring lane closures or significantly disrupting area traffic.

The majority of the construction activity associated with the proposed Project outside of the CTA would primarily occur in the Manchester Square area and along W. 96th Street. Access to businesses and hotels located adjacent to the construction areas would be maintained throughout the construction period, although detours or temporary access points may be required during certain phases of construction.

The timing of roadway improvements will greatly depend on the individual developers of the various Project components. Until LAWA has awarded design and construction contracts and determined which roadway improvements will be included with specific contracts, it is infeasible to specify exact timing of improvements. The Draft EIR assumed that roadway improvements would occur between 2018 and 2023, and made assumptions on when those improvements would occur during that timeframe. However, a detailed Construction Management Plan and schedule for those improvements has not yet been developed. Additionally, how construction will be implemented will be up to each contractor; they will be required to implement the mitigation measures identified below, but it will be up to each contractor to develop phasing plans and submit maintenance of traffic plans to LAWA for review and approval. All elements of the Project will be required to implement the mitigation measures discussed above (MM-ST(LAMP)-1 and MM-ST(LAMP)-3), as well as MM-ST(LAMP)-2, Maintenance of Traffic, MM-ST(LAMP)-4, Roadway Closure Restrictions, and MM-ST(LAMP)-5, Traffic Maintenance During Construction, as well as comply with all City of Los Angeles procedures and regulations regarding lane closures, pedestrian access, and traffic safety. As a result, it is infeasible to calculate temporary LOS or similar quantitative analyses of short-term, constantly-shifting construction impacts.

As stated in Section 4.12.3.8 of the Draft EIR, LAWA would establish a Project Task Force specific to the LAX Landside Access Modernization Program which that may be comprised of key stakeholders from LAWA, the Coordination and Logistics Management Team (CALM), other City departments, and others as deemed appropriate (MM-ST (LAMP)-1, as revised in Chapter 3, Corrections and Additions to the Draft EIR). Key responsibilities for the Task Force include providing input into worksite traffic control plans and other traffic management plans for lane closures and detours, in addition to working with residential and commercial neighbors regarding upcoming construction activities in order to keep key stakeholders, businesses, and residents notified and informed during construction. Prior to initiation of construction, contractors would be required to complete Worksite Traffic Control Plans MM-ST (LAMP)-3, which would include a description of how the contractor will manage all construction-related traffic; therefore allowing LAWA to be proactive in managing landside operations.

MM-ST (LAMP)-4, Roadway Closure Restrictions, states that no designated major or secondary highway will be closed to vehicular or pedestrian traffic except at night or on weekends, unless approval is granted by the jurisdiction in which it is located.

Regarding the comment on construction workers, the analysis of traffic from construction workers is described in Section 4.12.3.7 of the Draft EIR. See also Response to Comment LAMP-AL000012-8.

**LAMP-AL00012-10**

**Comment:** 7. ***Deficient Transportation Demand Management Program*** – A key element of the proposed package of mitigation measures is the implementation of a Transportation Demand Management (TDM) Program (MM-ST (LAMP)-6, DEIR p. 4.12-179 – 4.12-180). This measure calls for the conduct of travel surveys and the formation of a Transportation Management Organization (TMO), which will then offer various vaguely-defined "amenities/opportunities" to LAX-area employees.

The goal of this mitigation measure is to "[a]chieve a 5 percent trip reduction performance objective," which is further defined as:

- Elimination of 200 peak hour trips (am or pm) identified as "drive alone" employee trips.
- Elimination of 800 average daily one-way trips identified as "drive alone" employee trips.

It is unclear how the effectiveness of the TDM program will be measured, although perhaps the surveys referred to above might be helpful. More importantly, what happens if the performance objective is not met and the necessary trip reduction does not occur? By the time this failure becomes apparent, surrounding jurisdictions that will be inundated with LAX-generated traffic will have no recourse.

The proposed TDM program must be described in greater detail, and credible evidence of the specific beneficial effects of the various components of the program must be presented. As currently delineated, the value of the TDM program in effectively mitigating the impacts of the proposed project is questionable.

**Response:** Please see Response to Comment LAMP-AL00006-5. LAWA is proposing, as part of the LAX Landside Access Modernization Program, to implement a Transportation Demand Management (TDM) Program, identified as Mitigation Measure MM-ST (LAMP)-6 on pages 4.12-179 and 4.12-180 in Section 4.12.2.9.1 of the Draft EIR, which would widen the scope of its existing trip reduction efforts and offer LAX employees more choices on how to get to and from work. LAWA is examining ways to implement a TDM Program early in the project stages.

The TDM Program, as described in Section 4.12.2.9.1 of the Draft EIR, includes preparation and conduct of an employee travel demand survey and based on the results of the survey, design and implementation of an LAX TDM Program including formation of a Transportation Management Organization (TMO). The TDM Program could include choice of alternative transport, enhanced vanpool, carpool programs and provision of transit passes; and car-share and employee shuttle programs.

The Draft EIR's description of the TDM Program's performance standards and options is sufficient, and meets CEQA requirements. See State CEQA Guidelines Section 15126.4(a)(1)(B). Details of the TDM Program were not available at the time of EIR preparation because, following Project approval, LAWA would need to hire or contract with an entity to develop and implement the TDM Program and needs to perform a survey (the first step in the

process) to determine which options would be most effective in the targeted areas and with the targeted employees. Additionally, LAWA may elect to employ different strategies in different jurisdictions; but without the data to formulate an effective TDM Program, it was infeasible to specify exactly what the TDM Program would look like at the time of EIR preparation.

Nine months after the launch of the TDM Program, LAWA would conduct another follow-up survey to ascertain the performance of the Program, pros and cons of the Program elements, and consider re-tooling the Program to maximize its effectiveness.

The performance or effectiveness of these measures used in the estimation of mitigation was 5 percent of the employee drive-alone trips – equivalent to a reduction of 200 peak hour trip reduction in employee drive-alone trips or 800 average daily one-way employee trips reduction. These trip reduction estimates are very conservative and small, given all the elements of the robust TDM Program proposed for the Project. The follow-up survey planned at 9 months after implementation of the Program would provide the required information necessary to estimate the effectiveness of the TDM measures and further fine-tune the various elements of the Program to maximize its effectiveness.

**LAMP-AL00012-11**

**Comment:** 8. ***Failure to Address Freeway Access Deficiencies*** – As currently configured, the freeway access system serving LAX imposes an undue burden on the City of El Segundo. In particular, travelers approaching LAX on northbound I-405 tend to exit the freeway at westbound I-105, rather than continuing to Century Boulevard, where chronic traffic congestion causes delays, inconvenience, and frayed nerves. Unfortunately, the exit ramp from northbound I-405 to westbound I-105 overshoots Aviation Boulevard, so that these travelers are forced to use Nash Street, Maple Avenue, and Sepulveda Boulevard within El Segundo to reach the CTA.

As passenger traffic at LAX increases, this situation will be exacerbated. The DEIR needs to address the potential for improved access from northbound I-405, particularly with respect to modifications to the northbound-to-westbound ramp between I-405 and I-105 that would allow drivers to exit from that ramp to Aviation Boulevard.

**Response:** The commentor notes that "travelers approaching LAX on northbound I-405 tend to exit the freeway at westbound I-105, rather than continuing to Century Boulevard, where chronic traffic congestion causes delays… The DEIR needs to address the potential for improved access from northbound I-405…*".*

As noted in Response to Comment LAMP-AL00012-7 above, existing environmental issues which are part of baseline conditions are not environmental impacts of the proposed project. (State CEQA Guidelines Section 15126.2(a); *Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1094 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"].) Furthermore, the Draft EIR for the proposed Project includes a set of mitigation measures that specifically addresses the I-405 northbound access to LAX and its facilities (see Section 4.12.2.9.3). The Project would fully fund the implementation of the following mitigation measures including:

- An additional auxiliary lane on northbound I-405 between the El Segundo Boulevard on-ramp and the Imperial Highway off-ramp;
- An additional lane on the Imperial Highway off-ramp and improvements at the Imperial Highway / I-405 northbound off-ramp intersection; and
- An additional lane on northbound La Cienega Boulevard between Imperial Highway and

Century Boulevard, coupled with intersection improvements at all intersections within that stretch.

These mitigation measures would substantially improve the I-405 northbound access to LAX and its facilities, particularly the CONRAC and ITF East within Manchester Square and the Century and Imperial Cargo areas, and as such would balance the traffic flows from northbound I-405 freeway to the various access options (See Chapter VI of Appendix O for a comprehensive description and discussion of effectiveness of all the mitigation measures including the measures noted above). No additional modifications are needed as all Project-related impacts in this area would be fully mitigated with the above mitigation measures.

As noted in Section 4.12.2, Off-Airport Transportation, and in Appendix O, Off-Airport Traffic Study, the intersections referenced above would not be significantly impacted by the proposed Project.

**LAMP-AL00012-12**

**Comment:** 9. ***Nonexistent Project Access Analysis*** – The project proposes three major facilities that will each incorporate substantial parking structures, including a total of 24,300 parking spaces:

- Intermodal Transportation Facility (West) – 8,000 parking spaces,
- Intermodal Transportation Facility (East) – 8,300 parking spaces, and
- Consolidated Rental Car Facility – 8,000 parking spaces.

The DEIR presents no analysis to evaluate the access systems at these facilities, however. Such an analysis would address whether vehicles will be able to enter the facilities without queuing back onto the public street, thereby creating congestion and potential safety hazards. If left turns are required to enter the garages, can they be made safely? Also, will exiting drivers be able to do so safely, without creating hazards for themselves or passing motorists? Will either entering or exiting vehicles be subject to excessive idling, which would affect air quality and greenhouse gas emissions?

**Response:** The commentor asserts that no analysis to evaluate the access system at the proposed ITF West, ITF East, and CONRAC has been included in the Draft EIR. While defining the proposed Project elements in the Project Description (see Chapter 2 of the Draft EIR), detailed access system analysis and evaluation was conducted to adequately size the driveways, provide required number of turn lanes and through lanes, provide adequate length of storage and appropriate traffic control. An analysis of various intersections that provide access/egress to the various facilities is provided in Table 4 below; as shown, there are no significant congestion (LOS) impacts at any of these intersections. The following is a list of the access/egress locations for the various Project facilities noted in the comment:

ITF West → Obtains primary access off of 96th Street and New A Street (shown in Table 3)

Obtains primary egress off of 96th Street and Airport Boulevard (analysis provided in Section 4.12.2 of the Draft EIR)

ITF East → Obtains primary access off of 98$^{th}$ Street extended west of Concourse Way and off of Aviation Boulevard north of 98th Street extended

Obtains egress off of Concourse Way north of 98$^{th}$ Street extended

CONRAC → Obtains grade-separated access off of 98th Street extended west of La Cienega Boulevard where no conflicts occur for vehicles accessing the facility from east or west

Obtains egress at Hindry Avenue and Arbor Vitae Street (analysis provided in Section 4.12.2 of the Draft EIR)

**Table 4**

**Summary of Access Intersection Level of Service Analysis**

| Intersection | Peak Hour | Future (2024) with Project Conditions V/C | Future (2024) with Project Conditions LOS | Future (2035) with Project Conditions V/C | Future (2035) with Project Conditions LOS | Future (2035) with Project and Related Development Conditions V/C | Future (2035) with Project and Related Development Conditions LOS |
|---|---|---|---|---|---|---|---|
| | | 0.674 | | 0.735 | | 0.767 | |
| Aviation Boulevard & 98th Street | AM PM | 0.823 | B D | 0.857 | C D | 0.895 | C D |
| | | 0.547 | | 0.564 | | 0.652 | |
| Concourse Way & 98th Street | AM PM | 0.736 | A C | 0.750 | A C | 0.867 | B D |
| | | 0.460 | | 0.581 | | 0.586 | |
| New 'A' Street & 98th Street | AM PM | 0.544 | A A | 0.886 | A D | 0.893 | A D |
| New 'A' Street & 96th Street-ITF West | | 0.286 | | 0.485 | | 0.486 | |
| Dwy | AM PM | 0.490 | A A | 0.533 | A A | 0.534 | A A |
| | | 0.726 | | 0.733 | | 0.735 | |
| Sepulveda Boulevard & 96th Street | AM PM | 0.747 | C C | 0.830 | C D | 0.832 | C D |

Source: Raju Associates, Inc. analysis, January 2017.

In summary, all access and egress locations to the above-mentioned facilities have been designed to accommodate the peak flows to the respective facilities and included as part of the Project Description for the Project. All access locations have been designed to function at LOS 'D' or better at all times, and were considered as part of the Draft EIR's traffic study. Based on the traffic volumes forecast to utilize the facilities, intersections were designed to include turn lanes and traffic signals, as warranted, in order to allow traffic from all directions to safely and efficiently access the proposed facilities. Therefore, there would be no excessive queuing, congestion, safety hazards, or idling associated with access to these facilities.

**LAMP-AL00012-13**

**Comment:** 10. ***Mitigation Measures*** – In addition to the questions presented above regarding the TDM mitigation measure, we have identified a number of additional questions concerning the mitigation measures presented in the DEIR Transportation/Traffic section, as follows:

- *MM-ST (LAMP)-7. Signal System Corridor Improvements – Intelligent Transportation System (ITS), City of Inglewood*: This measure includes a "monetary contribution" toward certain improvements, but does not specify the magnitude of the contribution. Will the proposed project fully fund the needed system upgrades or only pay a "fair share"?

Also, three of the intersections listed in this measure are also addressed in other mitigation measures, specifically:

- MM-ST (LAMP)-13. La Cienega Boulevard and Florence Avenue
- MM-ST (LAMP)-14. Inglewood Avenue and Century Boulevard
- MM-ST (LAMP)-16. La Cienega Boulevard and Manchester Boulevard

What is the difference between MM-ST (LAMP)-7 and these other three measures?

**Response:** LAWA would fully fund the needed system upgrades included in Mitigation Measure MM-ST (LAMP)-7, Signal System Corridor Improvements - Intelligent Transportation System (ITS), City of Inglewood.

Mitigation Measures MM-ST (LAMP)-13, -14 and -16 are all part of the Mitigation Measure MM-ST (LAMP)-7 improvements that include all required system upgrades along La Cienega Boulevard and Century Boulevard within the City of Inglewood. They were broken out into individual measures to provide additional detail and to address specific significant impacts identified in the Draft EIR at those intersections.

**LAMP-AL00012-14**

**Comment:**

- MM-ST (LAMP)-8. Signal System Corridor Improvements – Closed Circuit TV (CCTV) Camera and Changeable Message Signs (CMS) Installation: This measure states that the proposed project, ". . . will provide funding towards implementation of Changeable Message Signs (CMS) along key access corridors to LAX such as Sepulveda Boulevard, La Cienega Boulevard and Century Boulevard."

The measure does not state how much funding will be provided and is unclear as to whether the specific corridors listed are the only ones where CMS will be installed or if these are only examples of where this might occur. In short, additional specificity is required to allow a meaningful assessment of the beneficial effect of the measure.

**Response:** The commentor is directed to pages 4.12-181 and 4.12-182 of the Draft EIR for clear specification of the improvements and locations that LAWA, as part of the proposed Project, would provide as part of Mitigation Measure MM-ST (LAMP)-8, Signal System Corridor Improvements – Closed Circuit TV (CCTV) Camera and Changeable Message Signs (CMS) Installation. Mitigation Measure MM-ST (LAMP)-8 states that LAWA shall implement signal system upgrades within the study area by installing CCTV cameras at the locations identified below.

- Sepulveda Boulevard and Manchester Avenue
- Sepulveda Boulevard and La Tijera Boulevard
- Sepulveda Boulevard and Westchester Parkway
- Sepulveda Boulevard and Lincoln Boulevard
- Sepulveda Boulevard and Century Boulevard
- Sepulveda Boulevard and I-105 Freeway Ramps
- Sepulveda Boulevard and Imperial Highway

A detailed description of the improvements is also provided on page 307 in Chapter VI in Appendix O of the Draft EIR. Additionally, to provide real-time information as well as predictive time information, the Project would provide funding to implement CMS along key access corridors to LAX such as Sepulveda Boulevard, La Cienega Boulevard and Century Boulevard. LAWA would fully fund the improvements specified, although the exact cost will be unknown until it is put out for bid.

**LAMP-AL00012-15**

**Comment:**

- *DEIR Section 4.12.2.9.3 Roadway Corridor Improvements* lists three significant roadway system improvements. However, these improvements are not designated as mitigation measures (i.e., they have no "MM-ST (LAMP)" number; those numbers skip over these three

improvements). Consequently, it is not clear whether the proposed project will actually be required to implement these improvements.

**Response:** The Draft EIR has been revised to include specific MM-ST (LAMP) numbers for the Roadway Corridor Improvements identified in Section 4.12.2.9.3 of the Draft EIR, as well as the Fair-Share Contributions for Cumulative State Highway/Freeway Impacts identified in Section 4.12.2.9.5 of the Draft EIR; see Chapter 3, Corrections and Additions to the Draft EIR.

These improvements are part of the mitigation program for the proposed Project and will be included in the Mitigation Monitoring and Reporting Program for the LAX Landside Access Modernization Program Project.

**LAMP-AL00012-16**

**Comment:**

- *MM-ST (LAMP)-11. Modify the Intersection of La Cienega Boulevard and Arbor Vitae Street*: This measure says that the proposed project will add a second eastbound left turn lane and "contribute to design and implementation of signal system improvement," which will "increase intersection capacity by 10 percent."

The amount of the contribution toward the signal improvements is unclear. Will the proposed project pay the entire cost or some lesser "fair share"? Further, the specific nature of the signal system improvement is not stated and the conclusion regarding its impact on intersection capacity is unsubstantiated.

**Response:** LAWA, as part of the proposed Project, would fully fund the system upgrade necessary for implementation of ITS improvements along La Cienega Boulevard and Century Boulevard travel corridors in the City of Inglewood. The signal system improvement at the La Cienega and Arbor Vitae Street intersection is a component part of this signal system upgrade noted in the Mitigation Measure MM-ST (LAMP)-7 that would be fully funded by LAWA.

Chapter VI in Appendix O, page 310, of the Draft EIR provides a detailed description of the signal system upgrade. Several studies of 'before' and 'after' ITS implementation have shown an improvement of greater than 10 percent in the capacity of intersections. Various cities and jurisdictions in southern California, including the City of Los Angeles and the City of Inglewood, offer a capacity enhancement of 10 percent at intersections where such system improvements are provided.

**LAMP-AL00012-17**

**Comment:**

- The indirect impacts of implementing the proposed mitigation measures are not adequately addressed. This is briefly addressed at DEIR pp. 4.12-185 – 4.12-186, but that limited discussion revolves around the following statement:

> *The environmental impacts associated with the proposed improvements to the off- Airport transportation system would depend on the specific nature, location, and extent of such improvements.*

The "specific nature, location, and extent" of the mitigation measures have presumably been set forth in the paragraphs preceding this statement and are, therefore, known. As such, a meaningful evaluation of the indirect impacts of implementing the measures should be possible. None is provided, however.

**Response:** It provides no evidence that indirect impacts of any mitigation measure are reasonably foreseeable or would be significant. The implementation of the proposed mitigation measures was evaluated in terms of their effect on traffic (see Section 4.12.2.10 of the Draft EIR). The majority of the proposed mitigation measures consist of Intelligent Transportation System (ITS) improvements (signalization, closed-circuit TV cameras, electronic messaging, etc.), signalization, and re-striping of intersections and/or roadways. The indirect environmental effects of these would be less than significant. Mitigation measures that include any widening of intersections or other roadway improvements would all occur within the existing right-of-way, would not impact any existing structures, and would entail minor routine construction. The indirect environmental effects of these would be less than significant.

**LAMP-AL00012-18**

**Comment:** 11. ***Potential Future Development*** – The DEIR addresses, at a program level, an analysis scenario referred to as "2035 Future With Project and Potential Future Related Development." (DEIR pp. 4.12-153 - 4.12-165) This scenario includes the traffic associated with 900,000 square feet of commercial development in addition to the 2035 Future With Project scenario. No information is presented to describe the specific land use assumptions or the volume of traffic associated with the potential future related development. Clearly, assumptions of this type have been made, as the DEIR presents detailed intersection V/C and LOS results for this analysis scenario. Absent this basic information about the potential future related development, it is impossible to judge the validity of the analysis results for this scenario.

**Response:** Please see Response to Comment LAMP-AL00008-74 regarding land use assumptions for Potential Future Related Development. For traffic-related impacts associated with the LAX Landside Access Modernization Program Potential Future Related Development, please see Section 4.12.2.7.2 in the Off-Airport Transportation section of the Draft EIR. Additional information is also provided in Chapter 5 of Appendix O, Off-Airport Traffic Study, of the Draft EIR (beginning on page 184).

**LAMP-AL00012-19**

**Comment:** **CONCLUSION**

Our review of the "Transportation/Traffic" section of the Draft Environmental Impact Report for the LAX Landside Access Modernization Program in Los Angeles, California revealed several substantial issues the affecting validity of the conclusions presented in that document. A modified traffic impact analysis must be prepared, and that updated analysis should be incorporated into a revised environmental document.

We hope this information is useful. If you have questions concerning anything presented here, please feel free to contact me at (916) 783-3838.

**Response:** Please see Responses to Comments LAMP-AL00012-3 through LAMP-AL00012-18 above regarding responses to the issues raised by the commentor, and the adequacy of the transportation/traffic analysis in the LAX Landside Access Modernization Program Draft EIR. The comments and responses do not require preparation of a revised Draft EIR that would require recirculation under State CEQA Guidelines Section 15088.5.

## LAMP-PC00001 Mayhew, Chuck American Airlines 9/15/2016

**LAMP-PC00001-1**

**Comment:** The Metro Greenline Shuttle Bus many times is over crowded. This is caused by people parking in the Aviation Station for free and using the Shuttle for transportation to and from LAX to go to work. Those that pay to use the Metro Greenline are being denied boarding by this condition. Can you please tell me when this will be resolved

**Response:** As discussed on page 2-7 in Chapter 2, Description of the Proposed Project, of the Draft EIR, the primary objectives of the LAX Landside Access Modernization Program are to improve access to LAX and relieve congestion on Airport and surrounding roadways, including providing a direct and convenient connection to transit. The Los Angeles County Metropolitan Transportation Authority (Metro) is independently working on a connection to the Airport along the Metro Crenshaw/LAX light rail line at their proposed Airport Metro Connector (AMC) 96th Street Transit Station to be located at Aviation Boulevard and 96th Street, about 1.5 miles east of the entry to the CTA. Upon completion of Phase 1 of the proposed Project in 2024, LAWA proposes to provide a direct connection from the LAX automated people mover (APM) system to Metro's station at W. 96th Street, allowing for direct access into the CTA from the Green Line.

It should also be noted that these proposed Project-related improvements are for the benefit of everyone that uses LAX, both passengers and employees. However, the Metro Green Line Shuttle is operated by Metro, and not LAWA or staff at LAX. Similarly, the Metro Green Line Shuttle is for the use of both employees and passengers of LAX. While implementation of the proposed Project may relieve overcrowded facilities, resolution of current overcrowding of the Metro Green Line Shuttle buses asserted by the commentor is the responsibility of Metro.

LAWA's Planning and Development Group plans to relocate the LAWA G Bus from Aviation/Imperial to the northeast corner of Bellanca Avenue and W. Century Boulevard. The bus operation would be relocated to that new bus stop when the Crenshaw Light Rail Line begins operation in 2019. Metro passengers would use light rail to the future Aviation/Century Boulevard station and walk one short block to the G bus stop.

## LAMP-PC00002 Minosyan, Andrey Independent Taxi Co. 9/16/2016

**LAMP-PC00002-1**

**Comment:** Independent Taxi Co., is a Franchisee of the City of Los Angeles and authorized LAX Taxicab company. Our only concern is than Taxis will continue to pick up at curbside on the Lower/Arrival Level islands in front of each terminal.

**Response:** As shown in Tables 4.12.1-8, 4.12.1-9, 4.12.1-10 and 4.12.1-11 of the Draft EIR, the EIR assumes that taxis would be able to continue to operate in the CTA as well as at both ITFs under future 2024 and 2035 scenarios. Please also note that, as discussed in Section 2.4.6 of the Draft EIR, as part of the LAX Landside Access Modernization Program, in the future LAWA would institute policy changes, including reclassification and pricing differential strategies that could result in commercial vehicle operators such as taxis, limousines, and TNCs utilizing the ITF West and the ITF East.

## LAMP-PC00003 Sievering, Eric None Provided 9/17/2016

**LAMP-PC00003-1**

**Comment:** Hello thanks for working on the people mover idea. I support a people mover, and think it is generally a better idea than a train. I do wish the process of building it could be sped up. Maybe it could be built in sections somehow so it could start to transport people to the airport area, and the second phase could take people all the way. I think this is an important project we should hurry up on. I also think the people mover itself should be built first and everything else around it can be added later as its most important to get it up and running as quickly and safely as possible. Much thanks Eric Sievering

**Response:** The Automated People Mover (APM) system is the primary component of the LAX Landside Access Modernization Program; therefore, the construction of this component has been identified as the critical path for the proposed Project. As discussed in Chapter 2, Description of the Proposed Project, of the Draft EIR (see page 2-175), and construction of the APM would begin in approximately 2018 and conclude in approximately 2022/2023. Portions of the APM system would be constructed over an 18 hour workday; more hours than other elements of the proposed Project. Upon completion of construction of the APM, the system would need to undergo testing before becoming operational. As the design of the APM system and construction phasing is refined, LAWA will identify ways to speed up construction of the APM, if possible, and also whether it is feasible to open portions of the system up early. At this point, it would be speculative to determine whether those actions would be possible. However, the most complex part of the implementation of the APM will be construction of the guideway and APM stations within the Central Terminal Area (CTA), the most active area on the Project site and the center of Airport operations. As stated on page 2-7 in Chapter 2 of the Draft EIR, one of LAWA's goals for the proposed Project, including the APM component, is to "[d]esign and construct the new transportation facilities in a manner that minimizes disruptions to airport operations."

## LAMP-PC00004 Donahue, Ed None Provided 9/16/2016

**LAMP-PC00004-1**

**Comment:** Once again... a plan has been designed by people that apparently NEVER travel, or have not used these facilities in the past. We already have to walk forever to get out of the terminals, now you will make us walk another 500 to 1000 yards to get to your people mover... WITH luggage and kids. Go visit MSP and change planes or airlines sometime.

**Response:** The comment does not appear to be related to significant environmental issues to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c). However, the terminals would connect to the APM stations via elevated pedestrian walkways, incorporating moving walkways to assist passengers with extended distances. The maximum walking distance, including assisted walk distance, from any terminal to an APM station is 950 feet (not "500 to 1000 yards" as asserted by the commentor). The approximate lengths of pedestrian walkways and moving walkways, as well as total walk time, for the West CTA APM Station are provided in Table 2-3 (page 2-53) of the Draft EIR. The same information for the Center CTA APM Station and the East CTA APM Station are provided in Tables 2-4 (page 2-59) and 2-5 (page 2-67), respectively. As noted on pages 2-47, 2-53, and 2-67, "the precise locations and lengths of pedestrian and moving walkways are subject to change during the design process."

LAWA considered numerous operational characteristics during the planning of the APM system, including turning radii of proposed APM alignments, effect on APM operations and travel times,

and traffic and pedestrian circulation, as well as walk distances. Due to the physical constraints of the CTA and the close proximity of the terminals, a spine alignment with APM stations located approximately equidistant between the north and south terminals best met LAWA's operational criteria for the system. Chapter 5, Alternatives, Section 5.4.1.1 discusses the various APM alignment alternatives considered and how they were evaluated.

Passengers choosing to utilize the APM system may have a longer walk than they do today; however, the walk distance would be very similar for those passengers who choose to park in the CTA and walk to the terminals. The proposed Project would actually improve these conditions by providing moving walkways and elevated, grade separated walkways into the terminals; passengers would no longer have to walk across World Way to get to the terminal or their vehicles. Additionally, it should be recognized that passengers would still have the option of being dropped-off or picked-up in front of their terminals, as they are today.

## LAMP-PC00005 Russell, Stephen None Provided 9/18/2016

### LAMP-PC00005-1

**Comment:** I urge these for LAX:

Backup power for People Mover system

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, as stated in Section 2.4.1.2.4 in Chapter 2, Description of the Proposed Project, of the Draft EIR, a minimum of three separate traction power substations (TPSSs) would be constructed to power the proposed automated people mover (APM) system. Further, as stated on page 4.13-9 in Section 4.13, Utilities and Service Systems, of the Draft EIR, in the future, LAWA may construct an additional network station near the corner of Westchester Parkway and Pershing Avenue. The network station would primarily serve to provide redundancy in the case of power outages and increase the reliability of electrical service at the Airport. LADWP constructed vaults for this potential station when they installed an electrical line along Westchester Parkway in early 2016.

As indicated in Table 4.13.2-2 on page 4.13-15 of the Draft EIR, 77,651 Kilowatt Hours (kWH) per day would be required for the APM propulsion and control systems. Based on this amount of power required for the APM system, a complete backup power supply would not be cost effective. Instead, infrastructure provisions would be made to support a shuttle bus operation in the event of power failures that may result in reduced capacity or shut down of the APM system. The APM system would have limited battery capacity to support operations to return trains to passenger stations in the event of a power disruption, to avoid having trains and passengers stranded between stations.

As discussed in Section 4.11 of the Draft EIR (see page 4.11-24), the APM guideway would have an emergency walkway along the entire guideway to provide egress for passengers in the event of an APM failure (i.e., loss of power) or emergency, as well as access for emergency personnel.

### LAMP-PC00005-2

**Comment:** Have mini HyperLoop for Mover & connect to MTA??

**Response:** The commentor suggests that LAWA consider a HyperLoop to connect to the Metro Transit Line. The comment does not raise a significant environmental issue to which CEQA requires LAWA to

respond. (CEQA Guidelines § 15088(c).) However, the HyperLoop is a proposed method of travel that would transport people at 745 miles per hour between distant locations. Because this technology is theoretical (it has not been constructed anywhere) and the distance between the CTA and the proposed AMC Metro 96th Street Transit Station is less than 3 miles, this system is not a viable alternative to the proposed Project.

Chapter 5, Alternatives, of the Draft EIR identifies alternatives that were considered (see Section 5.4). A similar alternative to the HyperLoop is the Personal Rapid Transit (PRT) alternative, discussed in Section 5.4.1.1.3. The PRT alternative was suggested during the Notice of Preparation process and would consider personal rapid transit pods (which could include a fleet of battery powered, driverless pods) each of which could transport up to four passengers and their luggage from the Consolidated Rental Car Facility (CONRAC) and Intermodal Transportation Facilities (ITFs) to the Central Terminal Area (CTA) via an elevated guideway that would follow the upper roadway and the upper levels of the CTA parking garages.

The PRT alternative was precluded from further analysis as it would not avoid or substantially lessen significant impacts of the proposed Project. Further, the proposed APM trains would serve a much larger population per train, thus better reducing congestion near the CTA and related vehicle emissions.

**LAMP-PC00005-3**

**Comment:** System must counter hacking of trains.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, all APM systems include safety provisions that limit their vulnerability to hacking. While each manufacturer utilizes their own proprietary technology, there are common features that are shared by APM systems. APM systems typically use a closed-loop network that is not accessible by external users. This restricts any outside electronic communication and limits communication to users with access to the Central Control Facility. In addition, many operating systems also use proprietary communications protocols that encode the data that can be transmitted to the system. If a person does not know the electronic "key", the data will not be recognized by the control system.

As noted in Section 2.4.1.2.3 of Chapter 2, Description of the Proposed Project, the Central Control Facility for the APM system would be located at the APM Maintenance and Storage Facility (MSF). Security features of the MSF would include controlled access through automated gates for vehicles and pedestrians. Security measures for the APM MSF building would include perimeter fencing, automated gates, intercoms, electronic security card systems, security cameras, and security personnel.

**LAMP-PC00005-4**

**Comment:** need backup shuttle buses should People Mover breakdown???

**Response:** Please see Response to Comment LAMP-PC00005-1 which describes procedures in the event of an emergency or power-failure associated with the proposed APM system.

**LAMP-PC00005-5**

**Comment:** Need backup cars for People Mover IF warranted.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, a certain number of APM cars would be available for backup as each car would be periodically taken out of service for cleaning, washing, and routine maintenance. In the event of an APM car being disabled for other reasons, these other cars would be put into service as needed.

**LAMP-PC00005-6**

**Comment:** EZ ramps On OFF to People Mover.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, the cars of the automated people mover (APM) trains would be the same elevation as each APM station platform. Therefore, no ramp would be required to board or deboard the APM car. Section views of the APM platforms are shown in Figures 2-14, 2-16, 2-18, 2-26, 2-32, and 2-40 of the Draft EIR.

**LAMP-PC00005-7**

**Comment:** Larger moving walkways to PeopleMover & to rental Car center.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, elevated pedestrian walkways would connect the APM stations to the terminals and remote facilities, including the ITFs and CONRAC. The pedestrian bridges within the CTA would incorporate moving walkways to assist passengers with extended distances between APM stations and passenger terminals. The approximate lengths of pedestrian walkways and moving walkways, as well as total walk time, for the West CTA APM Station are provided in Table 2-3 (page 2-53) of the Draft EIR. The same information for the Center CTA APM Station and the East CTA APM Station are provided in Tables 2-4 (page 2-59) and 2-5 (page 2-67), respectively. The APM stations located at the remote facilities are short enough to not constitute the need for moving walkways. The moving walkways have been located in areas that would require more than a 200-foot walking distance. The APM system, stations, platforms, and pedestrian walkways would be compliant with the Americans with Disabilities Act (ADA).[1]

[1] 28 Code of Federal Regulations, Part 36, Americans with Disabilities Act, Title III Regulations, Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities, as amended by the final rule published on September 15, 2010.

**LAMP-PC00005-8**

**Comment:** Need Food Court at People Mover depot away from Terminals.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, as described on page 2-75 in Chapter 2, Description of the Proposed Project, of the Draft EIR, the APM stations would be designed for the movement of passengers to and from the APM. While design of these facilities has not been finalized, concessions may be provided at the APM stations both within the CTA and at the ITFs.

Dining and concession services located along the APM would not replace or reduce concessions within the terminals.

**LAMP-PC00005-9**

**Comment:** Need Fuel cells for aux power for whole LAX area.

**Response:** The LAX Landside Access Modernization Program addresses ground access improvements and does not address the power needs of the Airport or surrounding area. However, as described on page 2-148 in Chapter 2, Description of the Proposed Project, and page 4.5-59 in Section 4.5, Greenhouse Gas Emissions, of the Draft EIR, the proposed Project would include incorporation of solar panels to offset the Project's energy consumption and reduce secondary greenhouse gas emissions associated with Project-related electrical demand.

**LAMP-PC00005-10**

**Comment:** Food Court near Rental Car Center.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, please see Response to Comment LAMP-PC00005-8 which describes dining and concession services located along the APM and at the ITFs. As discussed in Chapter 2, Description of the Proposed Project, of the Draft EIR, the customer service building within the CONRAC would provide a range of amenities which could include concession services (see page 2-113). Additionally, the proposed Project would allow for potential future related development to be constructed on the parcels adjacent to the CONRAC (see Figure 2-51). As discussed on page 2-191, up to 200,000 square feet of commercial space could be developed, including restaurants and other concession services. Development of these areas would occur after construction of the proposed components of the Project. At such time as individual development projects are proposed on these parcels, additional CEQA project-level environmental review would be conducted, as necessary.

**LAMP-PC00005-11**

**Comment:** expand US Customs for guests from Tom Bradley Term to People Mover.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, the automated people mover (APM) would be located exclusively on the landside area of the Airport. Therefore, the system would not connect to an existing Customs and Border Protection facility, nor is one planned as part of the proposed Project.

**LAMP-PC00005-12**

**Comment:** Display Project at all Terminals.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, please note that graphic depictions of the proposed LAX Landside Access Modernization Program are provided in Chapter 2, Description of the Proposed Project, in the Draft EIR, as well as on the Project website at http://www.connectinglax.org/solution.html.

**LAMP-PC00005-13**

**Comment:** Have LAX model in Mayors Office visible for media etc.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c)). However, please note that graphic depictions of the proposed LAX Landside Access Modernization Program are provided in Chapter 2, Description of the Proposed Project, in the Draft EIR, as well as on the Project website at http://www.connectinglax.org/solution.html.

**LAMP-PC00005-14**

**Comment:** Update LAX CCTV alone & Security systems.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, the LAX Landside Access Modernization Program addresses ground access improvements and does not address the overall security of the Airport. The proposed Project would not provide for additional security systems at existing facilities around the Airport. However, any new facilities constructed as part of the proposed Project would incorporate security features, including security fencing, surveillance cameras, security lighting, and emergency phones/call boxes, as appropriate (see page 2-13 in Chapter 2, Description of the Proposed Project, of the Draft EIR).

**LAMP-PC00005-15**

**Comment:** Re organize TSA Area for screening.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, the LAX Landside Access Modernization Program addresses ground access improvements and does not address the overall security of the Airport. No changes to security areas or operations at existing facilities would be conducted as part of the proposed Project. However, the proposed Project would include development of the West CTA APM Station, which, as discussed in Chapter 2, Description of the Proposed Project, of the Draft EIR, may include passenger facilities to support Tom Bradley International Terminal (TBIT) and the future Midfield Satellite Concourse (currently under construction), consisting of ticketing, baggage screening, and baggage handling equipment along with airline and Transportation Security Administration (TSA) support spaces (see page 2-37).

**LAMP-PC00005-16**

**Comment:** Link People Movers to Airline Lounges IE British Airways & American Airlines etc.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, as stated on page 2-7 in Chapter 2, Description of the Proposed Project, of the Draft EIR, one of the primary objectives of the LAX Landside Access Modernization Program is to relieve congestion at LAX and on the surrounding street system by developing a flexible transportation system that provides alternatives to the CTA for passengers, airport and other employees, and airport-related vendors accessing LAX. As such, the Project proposes to connect the CTA with remote facilities via an elevated APM system. The LAX Landside Access Modernization Program addresses facilities entirely within the landside[1] area of the Airport. Airline lounges are located through security, on the airside portion

of the Airport. The APM guideway would not directly connect to the airline lounges or secure areas of the terminals, but would provide access to the landside area of the terminals.

[1] Airports are generally divided into landside and airside areas. Landside areas are accessible to the public and include roadway networks, parking lots, rental car operations, and public transportation facilities. Airside areas are restricted areas with access only to authorized personnel and ticketed passengers that have undergone security screening; airside areas include passenger handling facilities, runways, taxiways, apron areas and service roads.

**LAMP-PC00005-17**

**Comment:** More can be done.

Past LAX Guest.

**Response:** Please see Responses to Comments LAMP-PC00005-1 through LAMP-PC00005-16 above which address specific suggestions by the commentor.

## LAMP-PC00006 Russell, Stephen None Provided 9/17/2016

**LAMP-PC00006-1**

**Comment:** In time replace People Mover with modified HyperLoop system going at 80 mph IF viable for route connect to LA City MTA system.

**Response:** The content of this comment is similar to comment LAMP-PC00005-2; please refer to Response to Comment LAMP-PC00005-2.

## LAMP-PC00007 Russell, Stephen None Provided 9/17/2016

**LAMP-PC00007-1**

**Comment:** Urge system have Backup Power for People Mover, to counter hacking from outside, replacement cars IF any need service, Biometric scanning for Security along route for employees. Food Court for guests at both stations, Backup cars to add on for traffic IF warranted. Backup shuttle buses in case People Mover is down.

**Response:** The content of this comment is similar to portions of comment letter LAMP-PC00005; please refer to Responses to Comments LAMP-PC00005-1, LAMP-PC00005-3, LAMP-PC00005-4, LAMP-PC00005-5, LAMP-PC00005-8, LAMP-PC00005-10, and LAMP-PC00005-14. The comment regarding "Biometric scanning for Security along [the] route for employees" does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, LAWA will take under consideration the commentor's suggestion of "Biometric scanning for Security along [the] route for employees". As discussed on page 4.11-6 in Section 4.11, Public Services, of the Draft EIR, the California Public Utilities Commission (CPUC) prescribes safety and security requirements for the design, construction, operation, and maintenance over fixed guideway rail systems within the State. The CPUC would be the regulating authority over the Automated People Mover (APM), pursuant to CPUC General Orders 127, 143-B, and 164-D. CPUC would review and approve a System Safety Program Plan and Security Plan for the proposed APM.

## LAMP-PC00008 Russell, Stephen None Provided 9/17/2016

**LAMP-PC00008-1**

**Comment:** Urge Aux power to People Mover, Aux moving walkways also connected to People Mover, must survive hacking from outside.24.7 reliable, have backup cars IF warranted, EZ access to parking rental cars, shuttle bus service to IMC Rental Car center alone. Have Command Center for LAX System in place with CCTV array. Borrow ideas from TV Movie production, Security firms, Hi-tech firms for systems. Biometric scanning for select locales alone People Mover route estd. Dining for People Mover at Both stations, depots.

**Response:** The content of this comment is similar to portions of comment letter LAMP-PC00005; please refer to Responses to Comments LAMP-PC00005-1, LAMP-PC00005-3, LAMP-PC00005-5, LAMP-PC00005-6, LAMP-PC00005-8, LAMP-PC00005-10, LAMP-PC00005-14, and LAMP-PC00007-1. As described in Section 2.4.1.2.3, Chapter 2, Description of the Proposed Project, the APM operating center would be housed in the APM Maintenance and Storage Facility (MSF) and would be run from a central control room.

## LAMP-PC00009 Russell, Stephen None Provided 9/18/2016

**LAMP-PC00009-1**

**Comment:** Cant comment on Connecting LAX since email bounced 2X stating address sent is Restricted.

Tried 2X yesterday & email bounced from site.

PLS Remedy or bad PR for LAX & LAWA.

Past LAX Guest.

**Response:** Four comment letters were received from Mr. Russell through LAWA's website; see comments and responses for comment letters LAMP-PC00005, LAMP-PC00006, LAMP-PC00007, and LAMP-PC00008.

## LAMP-PC00010 Frank, Alec None Provided 9/19/2016

**LAMP-PC00010-1**

**Comment:** I wish to comment on the LAX Landside Access Modernization Program. Regarding the indicated route of the Automated People Mover, I would reroute the track within the airport from an out-and-back- down-the-center plan to a loop around the perimeter of the roadway with a station at each terminal. This would greatly minimize the walking distance from APM station to eventual airline gate. This would also allow the APM to act as an inter-terminal transportation option.

**Response:** LAWA considered numerous operational characteristics during the planning of the APM system, including turning radii of proposed APM alignments, effect on APM operations and travel times, and traffic and pedestrian circulation, as well as walk distances. Due to the physical constraints of the Central Terminal Area (CTA) and the close proximity of the terminals, a spine alignment with three APM stations located approximately equidistant between the north and south terminals best met LAWA's operational criteria for the system. Section 5.4.1.1 in Chapter 5, Alternatives, of the Draft EIR discusses the various APM alignment alternatives considered and how they were evaluated. See also Response to Comment LAMP-PC00004-1.

## LAMP-PC00011 Reid, Cody Park 'N Fly 9/19/2016

**LAMP-PC00011-1**

**Comment:** Is there a way to receive the below information as an attached PDF? The below information is hard to read/see being included in the message of the email.

**Response:** A PDF of the Notice of Availability (NOA) of a Draft EIR for the Landside Access Modernization Program was provided to Mr. Reid on September 19, 2016. As indicated in the NOA, additional information regarding the proposed Project, including an electronic (PDF) version of the LAX Landside Access Modernization Program Draft EIR, was available during the entirety of the review period[1] for the LAX Landside Access Modernization Program Draft EIR.at www.connectinglax.org.

[1] The Draft EIR was released for public review on September 15, 2016. LAWA extended the close of the review period for the LAX Landside Access Modernization Program Draft EIR from October 31, 2016 to November 15, 2016 to provide an additional 15 days for public comment beyond the requirements of CEQA (State CEQA Guidelines Section 15105).

## LAMP-PC00012 Birch, Stephen Flying Crown Land Group 9/19/2016

**LAMP-PC00012-1**

**Comment:** While I realize this is still in the conceptual stage, my comments center around Section 2.3 and 2.6. Specifically in Section 2.3, I believe that not enough emphasis is given to the historic nature of the Theme Building. While it is not a NPS Registered Landmark, it very much defines the airport and would be subject to DOT Part 4f and Section 106 considerations. As such, any obstruction of the structure would constitute an adverse effect to its sense of place should elevated APM structures be placed in close proximity to the building.

**Response:** As discussed in Section 4.4.3.3.2 of the Draft EIR, the Theme Building was determined eligible for listing in the National Register of Historic Places under Criteria Consideration G and Criterion C for its unique architecture. Through the prior LAX Master Plan Supplemental Section 106 process, the Federal Aviation Administration reconfirmed that the Theme Building satisfies National Register Criterion Consideration G for exceptional significance in a building less than 50 years old (at the time of the analysis) and determined it was eligible for listing in the National Register.[1]

Section 4.4.5.1.1 of the Draft EIR evaluates the potential effects of the proposed Project, including the elevated Automated People Mover (APM) system structures proposed in proximity to the Theme Building. The Draft EIR concluded that because the Project would not result in physical alteration of the structure and materials of the Theme Building, it would remain eligible for listing in the National Register of Historic Places, California Register of Historical Resources and as a City of Los Angeles Historic-Cultural Monument. While the physical materials and form of the Theme Building would remain intact, however, alteration of its surroundings by the Project would result in "material impairment" as defined by the California Environmental Quality Act (CEQA), because unique features of its architectural design as well as its original function would be substantially obscured, reducing its ability to convey its historic significance. For these reasons, the construction and operation of the APM guideway and the elevated walkway would result in a substantial adverse change to the Theme Building under CEQA.

In response to this adverse change, LAWA has proposed to implement Mitigation Measures LAX-HR (LAMP)-1,[2] Preservation of Historic Resources: Theme Building and Setting, discussed in Section 4.4.7.1 of the Draft EIR, and MM-A (LAMP)-1, Application of Design Features to Protect Aesthetic Context of Theme Building, discussed in Section 4.1.7 of the Draft EIR.

The commentor is correct that effects to the Theme Building would be subject to U.S. Department of Transportation (DOT) [Section] 4(f) and Section 106 considerations, which will be analyzed as part of the National Environmental Policy Act (NEPA) analysis for the LAX Landside Access Modernization Program, which the Federal Aviation Administration (FAA) initiated on June 22, 2016.

[1] City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Appendix I, Section 106 Report, January 2001, and Appendix S-G, Supplemental Section 106 Report, June 2003.

[2] A typographical error in the Draft EIR pertaining to the title of this mitigation measure has been corrected as follows to clarify that this mitigation measure is specific to the proposed Project and is not a LAWA Standard Control Measure applicable to all LAX projects: ~~LAX~~ *MM*-HR (LAMP)-1, Preservation of Historic Resources: Theme Building and Setting Mitigation Measure. This typographical error has been corrected throughout the text of the Draft EIR (See Chapter 3, Corrections and Additions to the Draft EIR).

**LAMP-PC00012-2**

**Comment:** I would strongly urge that alternative locations be sought for the APM as to not infringe upon sitelines which may impact the Theme Building and its eventual place on the NPS Registry.

**Response:** Chapter 5, Alternatives, of the Draft EIR, identifies and discusses numerous alternative APM alignments that were considered as part of the planning process for the LAX Landside Access Modernization Program. Specifically, Section 5.4.1.1.1 of the Draft EIR discusses the various Central Terminal Area APM alignments that were considered, how they were analyzed, and why certain alignments were rejected due to safety and security, operational, constructability, and pedestrian access considerations. As noted in the Response to Comment LAMP-PC00012-1, the Draft EIR concluded that because the Project would not result in physical alteration of the structure and materials of the Theme Building, it would remain eligible for listing in the National Register of Historic Places, California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument.

As part of the planning analysis conducted for the LAX Landside Access Modernization Program, several APM alignments within the Central Terminal Area were proposed and evaluated.[1] A number of criteria were established to evaluate the differing alternative alignments including:

- Whether an alignment would be feasible to construct within the physical constraints of the Airport environment (impacts to existing infrastructure, cost and complexity to remove or relocate existing facilities);
- Whether construction of the APM would substantially interfere with the operational capabilities of the Airport (minimizing direct and indirect impacts to passenger gates, maintaining key terminal functions and facilities, minimizing roadway closures, and maintaining sufficient parking); and
- Whether the alternative was operationally feasible (turning radii of alignments, effects on

APM operations and travel times; passenger walking distances).

The following APM alignments within the CTA were evaluated as part of the planning process.

**Terminal/Airside APM Alternative**

This alternative consists of a split (scissor alternative) APM alignment utilizing two corridors through the CTA: a northern section that runs parallel to World Way North and a southern section that runs parallel to World Way South. The APM would be constructed either on top of or beneath the existing terminal structures; an at-grade alignment would not be possible due to conflicts with the existing terminals and aircraft movement areas. The alignment would either be in a scissor or loop alignment, extending across Terminals 1, 2, and 3, and Tom Bradley International Terminal to the north, and across Terminals 4, 5, 6, 7, and 8 to the south. Under this alternative, the APM station(s) would be integrated into the terminals, allowing for vertical circulation to the arrivals and departures levels.

Construction of an integrated APM guideway and stations within the existing terminals/airfield would be infeasible within the current terminal/airfield configuration/constraints. Reconstruction of each terminal would be tremendously costly and severely impact access to the passenger terminals and aircraft gates during construction. Therefore, due to the severe impact to airport operations, this alignment option was considered infeasible.

**World Way APM Alternative**

The World Way APM Alternative would also consist of a split (scissor alternative) APM alignment utilizing two corridors through the CTA, consisting of either a scissor or loop alignment with access to all terminals. The northern section of the alignment would be constructed directly along World Way North and the southern section would be constructed along World Way South. APM station(s) would be located along World Way and connected to the passenger terminals and existing parking garages via passenger walkways.

The structural integrity of the existing Upper World Way, could not withstand the loading requirements of the APM. Reconstruction of this roadway to withstand the additional load of an APM would be extremely costly and severely impact access to the passenger terminals during construction. Construction of an elevated APM alignment along Lower World Way would require a construction right-of-way of up to 60 feet, or the equivalent of four lanes of roadway and a sidewalk. After construction, this APM alignment would result in the permanent removal of up to two roadway lanes for the placement of APM support columns. Removal of these lanes would severely impact vehicular access to the passenger terminals within the CTA. Therefore, due to the severe impact to airport operations, this alignment option was considered infeasible.

**Parking Garage APM Alternative**

The Parking Garage APM Alternative would also consist of a split (scissor alternative) APM alignment utilizing two corridors through the CTA: the northern section that runs parallel to World Way North and the southern section that runs parallel to World Way South. However, under this alternative, the APM guideway and stations would be constructed above, beneath, or through the existing parking garages adjacent to World Way. Under this alternative, the stations would be integrated into the parking garages, allowing for vertical circulation within each garage. Pedestrian walkways would connect the APM station(s) to the terminals.

Construction of this alternative would require substantial structural changes to the existing parking garages within the CTA. During construction of this alternative, the already constrained

existing parking capacity within the CTA would decrease by approximately 40 percent. Therefore, because of the substantial demolition required and the temporary reduction in CTA parking, this alignment option was considered infeasible.

### Center Way APM Alternative

The Center Way APM Alternative would consist of a single (spine alternative) APM alignment, commonly referred to as a "spine" alignment, located along Center Way. The APM alignment would travel along the northern portion of Center Way, to the north of the Central Utility Plant and the Theme Building, generally extending from the LAWA Administration Building to between Parking Garages P3 and P4. APM station(s) would be located along Center Way.

Constructing an aerial APM alignment would be feasible considering the physical constraints at the Airport. Through the use of columns, construction areas would be minimized and flexible in placement. Design of the APM guideway, stations, and support columns could be conducted to avoid existing facilities and span over existing roadways. Initial planning efforts determined that the construction impacts for an APM within the interior of the CTA, including the guideway and APM support columns, could be conducted with nominal impacts to passenger gates and roadway closures.

A dual-track guideway provides simultaneous operations in two directions, both to and from the CTA. This results in consistent headways and a time-certain schedule, operating more efficiently than a scissor or loop alignment. Furthermore, a single APM alignment generally following Center Way would not include any 90 degree turns and therefore, would meet minimum turning radii requirements for an APM system. The passenger walking distances to/from the APM and the passenger terminals may be farther than those alternatives that would have the APM alignment closer to the terminals; however, distances would be acceptable based on industry standards through incorporation of moving walkways.

### Underground APM Alternative

Construction of the APM completely underground through the CTA was also considered. An underground APM alignment (scissor alternative) would require major tunneling work beneath an active airport and surrounding network of roadways and adjacent buildings. The Central Utility Plant for the Airport is located in the center of the CTA; it provides heating, cooling, and hot water to each terminal in the CTA; thus a series of underground utilities emanates from the center of the CTA to each terminal building. Additionally, electrical power feeds are located off site and enter the CTA via underground conduits. The Central Outfall Sewer (COS), a 57 inch diameter circular 2-ring brick pipeline, runs underneath the CTA and serves the existing terminals. Based on the number of underground utilities and infrastructure beneath grade, this alignment option was considered infeasible.

### Potential Effects to Theme Building

LAWA conducted an analysis of the various APM alignments and alternatives to determine whether effects to the Theme Building could be avoided or substantially lessened. As discussed above, all of these alignments were determined infeasible due to their severe impact to airport operations and underground infrastructure. Because the passenger terminals at LAX are constructed in a narrow U-shaped area and because all of the passenger terminals and gates are fully utilized, it is infeasible for LAWA to shut down sections of the terminals to construct an APM in these areas. Thus, the only feasible option is to construct an above-grade APM that is situated in the center of the Airport.

As noted above, LAWA examined alignments that would be located to the north and south (scissor alternatives) of the Theme Building and alignments that were located only to the north (spine alternatives) of the Theme Building (see Section 5.4.1.1 in Chapter 5, Alternatives, of the Draft EIR). APM alignments constructed on both sides of the Theme Building would encroach on the Theme Building from both the north and south, resulting in greater impacts, when compared to an alignment that is located on only one side of the Theme Building. Additionally, LAWA worked closely with the planning team, including APM planning specialists, to push the guideway as far from the Theme Building as possible within the operational capability of the APM systems.

LAWA developed design guidelines as part of the proposed Project (see Appendix B of the Draft EIR), that specifically include measures to minimize the visual impact of the APM system on the Theme Building. These measures have been incorporated into Mitigation Measure MM-A (LAMP)-1, Application of Design Features to Protect Aesthetic Context of Theme Building. This mitigation measures specifies the following:

LAWA shall apply the following guidelines to the final design of the APM guideway and passenger walkway adjacent to the Theme Building to reduce visual impacts:

- Minimize the number of columns and structures surrounding the Theme Building by maximizing the column support span in this area.
- Minimize the bulk of the APM guideway structure to preserve openness around the Theme Building to the extent feasible.
- Design the APM and passenger walkway structures around the Theme Building to complement the existing Theme Building structure and better harmonize the Project elements and the Theme Building.
- Implement landscape elements in the vicinity of the Theme Building that enhance passenger and visitor's visual focus on the Theme Building (i.e., make the Theme Building the visual focus of this area, not the proposed Project elements).

Finally, LAWA is committed to preserving the Theme Building, as specified in Mitigation Measure MM-HR (LAMP)-1, Preservation of Historic Resources: Theme Building and Setting.

[1] City of Los Angeles, Los Angeles World Airports, LAX Connected, Board of Airport Commissioners Ground Transportation Workshop, May 5, 2014, Available: http://www.connectinglax.com/files/5.5.14_BOAC.Briefing_LAX.Connected.pdf.

**LAMP-PC00012-3**

**Comment:** Second, as a frequent user of the airport, I strongly urge reconsideration of the proposed image on page 1-3 and design considerations Section 2.6 the APM. The single track with three stations to serve all the terminals is non-condusive to travelers attempting to reach the CONRAC or ITF due to the lengthy transition between terminal and station. The loss of time and unrealistic proximity of the station to T3-T4-TB, and especially the location of proposed pedestrian walkway located between T4-T5 is ill advised. This location is inconvenient and excessive to passengers at both terminals. In addition, the transition from Arrivals to the pedestrian bridge are not addressed or articulated in Section 2.6.3. These deficiencies should be addressed and considered.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, as described in Section 2.4.1 in Chapter 2,

Description of the Proposed Project, of the Draft EIR, the APM would consist of a dual-track guideway, providing simultaneous operations in two directions, both to and from the CTA. The APM system would operate in a "pinched loop" cycle: multiple trains would follow each other, with trains utilizing switches at each end of the guideway to use the opposite lane for the return trip. During peak periods of operation, the APM would operate at headway intervals of approximately 2 minutes. The total travel time from one end of the APM system to the other (e.g., the CONRAC to the West CTA APM Station) would be approximately 9-10 minutes. Table 2-2 on page 2-32 of the Draft EIR shows in-vehicle travel times between stations.

Elevated pedestrian walkways would connect the APM stations to the terminals. The pedestrian bridges would incorporate moving walkways to assist passengers with extended distances between APM stations and passenger terminals. The West CTA APM Station would serve Terminals 4 and 5, and the Tom Bradley International Terminal. The approximate lengths of pedestrian walkways and moving walkways, as well as total walk time, for the West CTA APM Station are provided in Table 2-3 (page 2-53) of the Draft EIR.

Pedestrian walkways from each APM CTA station would connect to multi-level vertical cores within the terminals (see Figure 2-11). These cores would provide passenger access to and from the arrivals, departures and pedestrian walkway levels. As discussed on page 2-37 of the Draft EIR, each vertical core would be sized to accommodate up to 8 elevators, 2 stairways, and 4 up-down escalators. Specifics for arriving and departing passenger circulation at the West CTA APM Station is provided on page 2-47 of the Draft EIR; for the Center CTA APM Station on page 2-53 of the Draft EIR; and for the East CTA APM Station on page 2-59. As noted on page 2-37 of the Draft EIR, the locations of the pedestrian walkways are approximate, and are subject to change to provide appropriate access to the terminals or parking garages.

The distances to and from terminals to the APM stations, with moving walkways, are reasonable and within the range of normal airport walking distances.

**LAMP-PC00012-4**

**Comment:** A entire loop APM with third floor access to trains would be preferable for low-impact construction and ability to have smaller stations at each terminal or shared between terminals, ie T1-T2, T3-TB, TB-T4, T6-T6.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c)) However, Chapter 5, Alternatives, of the Draft EIR, identifies and discusses numerous APM alignment alternatives that were considered as part of the planning process for the LAX Landside Access Modernization Program and explains why these alternatives were rejected from further consideration in the Draft EIR. Specifically, Section 5.4.1.1.1 of the Draft EIR discusses the various Central Terminal Area (CTA) APM alignments that were considered, how they were analyzed, and why certain alignments were rejected due to safety and security, operational, constructability, and pedestrian access considerations.

As discussed in Response to Comment LAMP-PC00012-2, one of the APM alignments considered by LAWA was a loop alignment within the CTA, with multiple station stops either at each terminal or shared between terminals.[1] Due to space constraints within the CTA, a loop alignment is not operationally feasible – the APM trains would not be able to physically make the turning radii required at the west end of the CTA in front of the Tom Bradley International Terminal. The evaluation of an APM loop alignment also determined that the terminals are too closely spaced to allow for adequate headways between terminals to have stations located at every terminal or between every terminal. A discussion of LAWA's evaluation of an APM loop

alignment has been added to Section 5.4.1.1.1, as shown in Chapter 3, Corrections and Additions to the Draft EIR.

[1] City of Los Angeles, Los Angeles World Airports, *LAX Connected, Board of Airport Commissioners Ground Transportation Workshop*, May 5, 2014, Available: http://www.connectinglax.com/files/5.5.14_BOAC.Briefing_LAX.Connected.pdf.

**LAMP-PC00012-5**

**Comment:** I am very impressed with all architectural design elements as well as the integration of streetscapes.

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

**LAMP-PC00012-6**

**Comment:** On a final note, I believe it would be good governance to disclose the use of Ricondo and Associates as consultants since the package clearly has their identity on it, yet does not disclose their involvement.

**Response:** The comment does not raise a significant environmental issue to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c). Specific Ricondo & Associates staff and roles in the environmental analyses/document preparation of this EIR are identified in Chapter 8 of the LAX Landside Access Modernization Program Draft EIR.

## LAMP-PC00013 Osztreicher, Daniel None Provided 9/20/2016

**LAMP-PC00013-1**

**Comment:** I love this project.

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

## LAMP-PC00014 Hughes, Laurie Gateway to L.A. PBID 9/23/2016

**LAMP-PC00014-1**

**Comment:** On behalf of Gateway to L.A., a property-based business improvement district, serving area property owners and stakeholders since 1998, we are requesting that LAWA **extend** its 45-day comment period related to the Draft EIR for the LAX Landside Access Modernization Program ("LAMP").

The Draft EIR and its Appendices are 16,504 pages in length. If we were to read every day for 45 days, it would mean reviewing 366 pages or more a day, just to complete the review within this minimal time frame.

A 45-day public review period is an inadequate length of time for a document of this importance which will define the physical and aerial landscape of the landside area, where our members own properties and operate businesses, for our lifetimes and beyond.

Please extend the public review period for an **additional 45 days, to December 16, 2016**.

**Response:** LAWA provided a 60-day review period for the LAX Landside Access Modernization Program Draft EIR. Section 21091(a) of the Public Resources Code requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. (See also State CEQA Guidelines Section 15105.) The original 45 day review period for the LAX Landside Access Modernization Program Draft EIR was extended to provide an additional 15 days for public comment beyond the requirements of CEQA.

## LAMP-PC00015 Dorn, Heidi None Provided 9/26/2016

**LAMP-PC00015-1**

**Comment:** Please be sure to consider trash receptacles in all planning. Currently there are NO trash cans in the parking lot at the Aviation Imperial rail station and the lot is filthy. Anywhere where there will be an increase of people means an increase of trash. The surrounding areas, streets, all suffer with no trash receptacles and no pick up. Thank you for keeping our cities clean and attractive for everyone as you go forward to bring more accessibility to this area.

**Response:** Facilities proposed under the LAX Landside Access Modernization Program, including the Automated People Mover (APM) stations, pedestrian walkways, Intermodal Transportation Facilities (ITFs) and Consolidated Rental Car Facility (CONRAC), would incorporate trash and recycling receptacles. New streets and roadway improvements would be consistent with the requirements in the City of Los Angeles Mobility Plan 2035, which calls for an increase in the number of trashcans on sidewalks.[1]

[1] Los Angeles Department of City Planning, Mobility Plan 2035, An Element of the General Plan, adopted January 20, 2016, page 181, Available: http://planning.lacity.org/documents/policy/mobilityplnmemo.PDF.

## LAMP-PC00016 Sevilla, Virgil None Provided 10/11/2016

**LAMP-PC00016-1**

**Comment:** Thank you for your mailer I plan to look into this DEIR. If it does not include a walkway through the Sepulveda tunnel it is not human friendly and therefore not a modernization program at all. I envision a glass tube that is environmentally safe to allow humans to walk through from 1 side to the other. It is bad enough that people are heavily restricted in where they may go in or around the airport. Please consider these seriously. We are not waiting for another 50 years to claim another modernization program that is not human friendly. Even if you restrict them, as you have all this time, I still see them walk through. I have heard of some deaths occuring right there and if you continue to ignore it your jobs are all in vain. I dont even want to imagine how gruesome they are.

**Response:** The comment does not appear to be related to significant environmental issues to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c). However, LAWA has taken into consideration pedestrian movements and improvements consistent with the City of Los Angeles plans to provide enhanced pedestrian connections to the LAX Landside Access Modernization

Program components such as the Intermodal Transportation Facility (ITF) East and ITF West. Sepulveda Boulevard is a state-owned facility and Caltrans strives to implement pedestrian movements consistent with the City of Los Angeles plans as well. As noted in the comment, pedestrian movement through the Sepulveda Boulevard tunnel is challenging and, therefore, it is restricted. The addition of a pedestrian pathway would require the reconstruction of the entire tunnel, which is not part of the proposed Project. Widening of the tunnel would be logistically challenging as it goes underneath two active runways and carries a significant amount of traffic on a daily basis. Pedestrians instead are encouraged to use other parallel routes such as Aviation Boulevard.

LAWA has incorporated a set of design guidelines as part of the proposed Project (see Appendix B of the Draft EIR) that addresses pedestrian access and safety for LAWA-owned property. LAWA is also working closely with the City of Los Angeles Department of City Planning to develop a streetscape plan for Century Boulevard that incorporates standards for sidewalks and enhancements to Century Boulevard for pedestrians.

## LAMP-PC00017 Ogawa, Ed None Provided 10/15/2016

**LAMP-PC00017-1**

**Comment:** We need ONE web site where we can get comprehensive information on lane, street, freeway closures for ALL agencies, updated daily. Information in both map and list formats would be helpful. Thanks.

**Response:** Related specifically to the proposed Project, LAWA has proposed several mitigation measures with informational components. See Mitigation Measures MM-ST (LAMP)-1, Construction Traffic Project Task Force, MM-ST (LAMP)-2, Maintenance of Traffic, MM-ST (LAMP)-3, Worksite Traffic Control Plans, MM-ST (LAMP)-4, Roadway Closure Restrictions, and MM-ST (LAMP)-5, Traffic Maintenance During Construction (see Section 4.12.3.8 of the Draft EIR). LAWA intends to have a comprehensive website where information will be posted concerning Project-related roadway closures and detours.

MM-ST-(LAMP)-1, as revised in Chapter 3, Corrections and Additions to the Draft EIR, would establish a Project Task Force specific to the LAX Landside Access Modernization Program that may be comprised of key stakeholders from LAWA, the Coordination and Logistics Management Team (CALM), other City departments, and others as deemed appropriate. Key responsibilities for the Project Task Force include providing input into worksite traffic control plans and other traffic management plans for lane closures and detours, in addition to working with residential and commercial neighbors regarding upcoming construction activities in order to keep key stakeholders, businesses, and residents notified and informed during construction. Prior to initiation of construction, contractors would be required to complete Worksite Traffic Control Plans MM-ST (LAMP)-3), which would include a description of how the contractor will manage all construction-related traffic; therefore allowing LAWA to be proactive in managing landside operations.

The Project Task Force would review the traffic management plans to ensure the following topics are considered:

- Coordination with all other LAWA construction projects;
- Coordination with other public infrastructure projects;
- Detour impact analysis for pedestrian, business, bicycle, and traffic flow;

- Coordinate closures and restricted access with all potential special events and holiday traffic flow;
- Notification to the public with use of static signage, changeable message signs, media announcements, Airport website, etc.;
- Work with LAWA police and the Los Angeles Police Department to enforce delivery times and routes;
- Coordinate with police and fire personnel regarding maintenance of emergency access and response times;
- Monitor and coordinate deliveries;
- Establish detour routes;
- Work with residential and commercial neighbors regarding upcoming construction activities; and
- Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

The Project Task Force would collaborate with the appropriate groups to develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction. The Task Force would work closely with other LAWA departments, including Public Relations, Planning and Development, and Operations. The Task Force would also ensure that an innovative and effective construction outreach and communication strategy is developed to keep key stakeholders, businesses, and residents notified and informed during construction of the proposed Project.

MM-ST (LAMP)-2 would ensure that continued vehicular access to community facilities is maintained. The contractor shall provide at least one lane of traffic in each direction on access cross streets that are not going to be dead-ended during construction. If one lane of traffic cannot be maintained, the contractor shall provide a detour route for motorists.

MM-ST (LAMP)-3, as revised in Chapter 3, Corrections and Additions to the Draft EIR, requires that before the start of construction, Worksite Traffic Control Plans (WTCP) and Traffic Circulation Plans, including identification of detour requirements, must be formulated in cooperation with the affected municipalities and other jurisdictions (County, State) in accordance with the Work Area Traffic Control Handbook (WATCH) manual and the California Manual on Uniform Traffic Control Devices (MUTCD)[1] as required by the relevant municipality. The WTCPs will be based on lane requirements and other special requirements defined by the Los Angeles City Department of Transportation (LADOT), the affected municipalities for construction within their City and from other appropriate agencies for construction in those jurisdictions. The WTCP's shall be designed to maintain designated Safe Routes to School wherever possible during times of the year when nearby schools are in session. The WTCP's shall be reviewed and coordinated with the LAWA Project Task Force 30 days in advance of any restriction or closure, or with as much notice as technically feasible.

MM-ST (LAMP)-4 requires that no designated major or secondary highway be closed to vehicular or pedestrian traffic except at night or on weekends, unless approval is granted by the jurisdiction in which it is located.

MM-ST (LAMP)-5, as revised in Chapter 3, Corrections and Additions to the Draft EIR, requires the following be implemented during construction when appropriate City departments or local jurisdictions deem necessary:

- Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel periods to the degree possible and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.
- Access shall remain unobstructed, or equivalent alternate access provided, for land uses in proximity to the Project site during construction.
- Unless otherwise specified in the WTCP, the contractor shall maintain access to the businesses that rely on on-street parking and pedestrian access during construction. If it is necessary to temporarily restrict access to a business, the contractor shall provide the facility advance notice of restrictions. Unless otherwise specified in the WTCP, the contractor shall schedule access restrictions to off-peak hours or during times when the business is closed and shall not fully restrict access for the total hours of operation of business on any given day of operation.
- Relative to maintaining access to businesses, construction activities shall be sequenced to minimize the temporary removal of multiple blocks of on-street parking at one time unless otherwise specified by the WTCP.
- Contractors shall use temporary special signage to inform the public of closure information in advance of temporary closures. Signage shall also provide special access directions, if warranted.
- Notice of closure will be prepared by the contractor with legible maps and reviewed prior to dissemination by the Project Task Force.
- A construction management plan shall be developed by the contractor and will be implemented during construction, to include the following:
- Establish requirements for the loading, unloading, and storage of materials on the Project site
- Coordinate with the City and emergency and safety service providers to ensure adequate access is maintained to the project site and neighboring businesses.

[1] California State Transportation Agency, Department of Transportation, *California Manual on Uniform Traffic Control Devices, FHWA's MUTCD 2009 Edition*, including Revisions 1 & 2 as amended for use in California, 2014 Edition (including Revision 1), November 7, 2014.

## LAMP-PC00018 Robinson, Precious None Provided 10/15/2016

**LAMP-PC00018-1**

**Comment:** I urge you to consider environment in the broadest sense including socio-economic-environment. While I empathize with the homeless, the solution is not a pop up informal, tent-mobile home sub neighborhood. Please speed up acquisition of the scattered apartments where citizens must live in the midst on construction and people apparently in transit and some that seem to be on drugs and decreasing neighborhood security. In addition, other methods should be considered to enforce some kind of registration -- even if it is a low cost parking permit so we know who is occupying the space. I live at 5325 W. 93rd street and I am very concerned about the human environment as well as possible disturbances of asbestos.

**Response:** Acquisition of property and relocation of residents by federally-funded airports such as LAX is governed by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (codified as amended at 42 USC 4601-4655), its implementing regulations (49 CFR Part 24), and FAA Order 5100.37B Land Acquisition and Relocation Assistance for Airport Projects. The statute and its implementing regulations are referred to jointly as the Uniform Act.

Section 2.5.19 in Chapter 2, Description of the Proposed Project, of the Draft EIR discusses the existing relocation program for the Manchester Square area, part of the Aircraft Noise Mitigation Program (ANMP) Relocation Plan for the Belford and Manchester Square areas. The ANMP would continue with or without implementation of the proposed Project. As noted on page 4.10-30 in Section 4.10, Population and Housing, of the Draft EIR, if the land acquisition under the existing ANMP Relocation Plan for the Belford and Manchester Square areas is not completed by commencement of construction, LAWA and the City of Los Angeles may be required to exercise the use of eminent domain to acquire these remaining properties. The acquisition of these properties would displace existing housing, but would be done so in compliance with the Uniform Act discussed above as well as California Government Code §7260, which establishes a uniform policy for the fair and equitable treatment of persons displaced as a direct result of programs or projects undertaken by a public entity. In addition, as explained in the Draft EIR, the identified displacement would not necessitate the construction of replacement housing elsewhere and therefore impacts would be less than significant. (Draft EIR at page 4.10-31.)

Councilmember Mike Bonin, in partnership with the Los Angeles Mayor's Office, County Supervisor Mark Ridley Thomas' Office and LAWA, have developed a City/County Task Force focused on providing outreach services and housing opportunities to homeless individuals residing in the Manchester Square neighborhood near LAX, and increasing law enforcement patrols to maintain a high quality of life for the remaining residents still living in the neighborhood. The Task Force consists of various City and County Departments responsible for providing homeless outreach services in Manchester Square including the Los Angeles Homeless Services Authority (LAHSA), the Los Angeles County Department of Mental Health, the Los Angeles Police Department's Homeless Outreach Partnership Endeavor (HOPE) Team, and non-profit outreach service provider People Assisting the Homeless (PATH). This team is augmented by the Los Angeles World Airports Police Division, Los Angeles Police Department, and other necessary City Departments such as the Los Angeles Bureau of Sanitation. Over the past year, the Task Force has provided a number of individuals with access to housing, with many more currently in the process of searching for housing opportunities. The Task Force will continue to focus on this as the City and County work together to increase services in the area.

No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)). Additionally, under CEQA, economic and social effects of a project in themselves are not treated as significant effects on the environment. (State CEQA Guidelines Section 15131(a).)

## LAMP-PC00019 Hammer, Rod None Provided 10/19/2016

### LAMP-PC00019-1

**Comment:** Aviation, between Century and Imperial is an utter disgrace and reflects the inattention to the neighboring community. The roadway is in disrepair. There is no sidewalk for the pedestrians and workers whom traverse it on foot. And there is no lighting. This is a safety and security issue that reflects poorly on the executive management of LAX.

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

Please note that the stretch of Aviation Boulevard between Century Boulevard and Imperial Highway is outside of the limits of the LAX Landside Access Modernization Program and the

jurisdiction of LAWA; thus, pedestrian and streetscape improvements to this portion of Aviation Boulevard are not addressed in the Draft EIR. Additionally, as part of the LAX Landside Access Modernization Program, LAWA is adopting a set of Design Guidelines (see Appendix B of the Draft EIR), that would apply to future LAWA projects along this portion of Aviation Boulevard. The Design Guidelines apply to LAWA projects, including the LAX Land Access Modernization Program projects; terminal improvements in the Central Terminal Area (CTA), and CTA parking structures. The overall purpose of the Design Guidelines is to provide a framework to enhance the visual quality of the environment in and around LAX in a way that is consistent with Airport needs and existing area conditions. The Design Guidelines encourage the development of more sustainable and user friendly spaces with a focus on unified, high quality architecture and urban design, and a seamless interaction between a variety of users such as pedestrians, cyclists, transit riders, and automobile drivers with an emphasis on the passenger experience.

**LAMP-PC00019-2**

**Comment:** Further, visitors from near and far obtain a seriously negative view of what should be a proud gateway to Southern California. The executive management of LAX needs to implement and execute an immediate plan to upgrade the entire community infrastructure around LAX, an area of which it owns many structures and is the most powerful entity in the area. If I lived around LAX, I would have utter contempt for the lack of professionalism exhibited from top, middle and bottom management.

**Response:** One of the key objectives of the proposed Project is to "[e]nhance and integrate the overall design of LAX Landside Access Modernization Program facilities with existing CTA structures and new airport facilities both inside and outside the CTA" (see page 2-7, in Chapter 2, Description of the Proposed Project, of the Draft EIR). To meet this objective, LAWA has created a comprehensive set of design guidelines as part of the proposed Project (see Appendix B of the Draft EIR). The overall purpose of the design guidelines is to provide a framework to enhance the visual quality of the environment in and around LAX, including creating a more positive user experience. The design guidelines, which will be adopted as part of the LAX Specific Plan, will be incorporated into contract requirements for all project components, as well as terminal improvements in the CTA and CTA parking structures.

## LAMP-PC00020 Shrier, Kevin TPS Parking Management, LLC 10/4/2016

**LAMP-PC00020-1**

**Comment:** As you may know, TPS Parking Management, LLC d/b/a The Parking Spot operates two established facilities located near LAX providing off-airport parking and complimentary shuttle services to and from the airport.

As you know, the Draft EIR and its Appendices for the LAX Landside Access Modernization Program ("LAMP") are over 16,000 pages in length. LAMP not only has a significant impact on LAX but all surrounding local businesses, like The Parking Spot, that provide valuable service to the traveling public. We want to be sure that we have enough time to adequately review the Draft EIR and understand what implications the conclusions set forth therein will have on our daily operations today and for the foreseeable future.

A 45-day public review period is simply not enough time to provide the in-depth review that a document of this magnitude and importance should be afforded.

As such, we respectfully request that LAWA please extend the public review period for the Draft EIR at least an **additional 45 days, to December 16, 2016**.

**Response:** LAWA provided a 60-day review period for the LAX Landside Access Modernization Program Draft EIR. Section 21091(a) of the Public Resources Code requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. (See also State CEQA Guidelines Section 15105.) The original 45 day review period for the LAX Landside Access Modernization Program Draft EIR was extended to provide an additional 15 days for public comment beyond the requirements of CEQA.

## LAMP-PC00021 Hench, Cyndi Neighborhood Council of Westchester Playa 10/4/2016

**LAMP-PC00021-1**

**Comment:** The Neighborhood Council of Westchester Playa (NCWP) represents the Los Angeles communities of Westchester, Playa del Rey and Playa Vista. We write to register our comments regarding the Draft Environmental Impact Report (DEIR) for the Landside Access Modernization Projects (LAMP) at Los Angeles International Airport (LAX). Thank you for the opportunity to comment on the DEIR.

The NCWP recognizes that LAX is a vital economic engine in Los Angeles and Southern California. We also recognize that it is in great need of improvement and modernization to enhance how passengers experience LAX and perceive our city and region. We have several concerns regarding the DEIR for the LAMP.

- The NCWP requests that the public be granted more time than the required minimum comment period of forty-five (45) days. The LAMP is a very significant basket of projects with enormous impacts for the future of LAX and our community as a whole. Forty-five days is insufficient time for the public to review and comment on these projects that have been years in planning. NCWP requests that the comment period be extended an additional 45 days for a total of 90 days.

**Response:** LAWA provided a 60-day review period for the LAX Landside Access Modernization Program Draft EIR. Section 21091(a) of the Public Resources Code requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. (See also State CEQA Guidelines Section 15105.) The review period for the LAX Landside Access Modernization Program Draft EIR provided an additional 15 days for public comment beyond the requirements of CEQA.

**LAMP-P0C00021-2**

**Comment:** - The traffic analysis is flawed and underestimates both traffic volume and the negative impacts on the community. The analysis optimistically relies on “pricing strategies” to divert congestion and offers programs such as the LAX TDM/TMA that have no measure of success. These programs must have performance metrics included in order to determine the traffic reduction forecasts.

**Response:** This comment is practically identical to comment LAMP-AL00002-12; please refer to Response to Comment LAMP-AL00002-12.

**LAMP-PC00021-3**

**Comment:** - The traffic study assumptions/forecasts for 2024 need to be verified after Phase 1 has been in operation for one year. Any inconsistencies with this current EIR Transportation Model forecast must be rectified prior to any Phase 2 approvals.

**Response:** This comment is similar to comment LAMP-AL00002-13; please refer to Response to Comment LAMP-AL00002-13.Please see Response to Comment LAMP-AL00002-12 regarding the travel demand forecasting model developed for the proposed Project.

**LAMP-PC00021-4**

**Comment:** - The study includes “Fair Share” mitigation solutions to impacts created on the area freeways however funding for construction of these projects is not identified.

**Response:** This comment is identical to comment LAMP-AL00002-5; please refer to Response to Comment LAMP-AL00002-5.

**LAMP-PC00021-5**

**Comment:** This project assumes and enables significant passenger growth that will consequently have significant traffic impacts that are effectively not mitigated.

**Response:** Please see Section 6.3.2 of the Draft EIR for a discussion of the rationale for the conclusion that projected future increases in passenger activity levels forecasted by the Federal Aviation Administration (FAA) and the Southern California Association of Governments (SCAG) are anticipated to be realized with or without the proposed Project. Please see Response to Comment LAMP-AL00008-2 regarding further explanation of why projected passenger growth would occur with or without the proposed Project.

**LAMP-PC00021-6**

**Comment:** - A regional, all-inclusive transportation plan, including freeway improvements, intersection improvements and mass transit additions, is needed to insure transportation success of this project. If one area is not addressed/implemented the entire proposed solution to decrease congestion is jeopardized. Funding mandates from LAWA, various cities and state agencies, including Cal Trans, must be required.

**Response:** This comment is identical to comment LAMP-AL00002-14; please refer to Response to Comment LAMP-AL00002-14.

**LAMP-PC00021-7**

**Comment:** - It is unclear if the traffic study has included the anticipated impacts that may result from the Los Angeles Mobility Plan for Playa del Rey - Culver Blvd Street Standards. This recently adopted plan must be considered and traffic study reevaluated.

**Response:** The City of Los Angeles Department of Transportation’s (LADOT’s) policy relative to future cumulative improvements[1] allows for only those improvements that have been fully funded or those that are partially funded but have a high probability of being fully funded in the near future, to be included in the cumulative network assumptions. The baseline improvement assumptions used in the traffic study for the proposed Project conservatively included roadway and intersection improvements that were fully funded. Appendix O, Off-Airport Traffic Study

Appendices, of the Draft EIR provides details of the traffic impact analyses of the proposed Project under both Phases 1 and 2, in the Future Years 2024 and 2035, respectively, using consistent assumptions relative to baseline network improvements, per LADOT's policy. Because the Los Angeles Mobility Plan for Playa del Rey – Culver Boulevard Street Standards is not funded or partially funded, per the City of Los Angeles' policy relative to future cumulative improvements, this improvement was not included in the traffic analysis.

[1] Los Angeles Department of Transportation, Traffic Study Policies and Procedures, August 2014.

**LAMP-PC00021-8**

**Comment:** - Imperial Highway and Aviation Blvd will serve as a primary construction haul routes for this, as well as other projects that are taking place at LAX. Funding needs to be identified to properly improve and maintain these important roadways during and after construction is complete.

**Response:** LAWA will work with the agencies responsible for the funding of this improvement and maintenance of these roadways to identify any issues during construction with the condition of the haul routes.

**LAMP-PC00021-9**

**Comment:** - The six years of neighborhood impacts by the reduction of CTA passenger parking during construction will increase parking and ride-sharing pick-ups have not been addressed.

**Response:** The comment is similar to comment LAMP-AL00002-15; please see Response to Comment LAMP-AL00002-15.

**LAMP-PC00021-10**

**Comment:** - The assumptions related to the numbers of projected passenger counts and total operations in 2035 are inconsistent with historical trends. The forecast for 2035 has Million Annual Passengers (MAP) at 96 to total operations (in 000's) at 850, which is a ratio of .113. The ratio in 2015 was .127 and you have to go back to 2010/2011 to find a ratio of .113. This may indicate that the MAP is understated by more than 12%.

**Response:** It appears that the commentor is referencing the results of the analysis of the ratio of million annual passengers (MAP) per 100,000 operations developed by another commentor, the Alliance for a Regional Solution to Airport Congestion (ARSAC). See Response to Comment LAMP-PC00032-16, which demonstrates that the ratio calculated by ARSAC for 2035 is incorrect. Therefore the MAP levels used in the Draft EIR analyses are correct, as identified in the introduction to Chapter 4, Environmental Impact Analysis.

**LAMP-PC00021-11**

**Comment:** - LAWA must develop a robust communications plan for the next 10 years that incorporates social media, email, outreach and print, to keep the area stakeholders apprised of construction impacts (noise, late night work, road closures, haul route activity).

**Response:** This comment is practically identical to comment LAMP-AL00002-18; please refer to Response to Comment LAMP-AL00002-18 which describes the Project Task Force that would be established as part of Mitigation Measure MM-ST (LAMP)-1 to develop a comprehensive and long-term

communication and construction impact outreach strategy for implementation during construction of the proposed Project.

**LAMP-PC00021-12**

**Comment:** - While construction haul routes have been identified, no mention is made of the commuter routes for all other construction related traffic. All construction related traffic routes must be specified.

**Response:** This comment is identical to comment LAMP-AL00002-17; please refer to Response to Comment LAMP-AL00002-17 regarding construction-related traffic routes. As discussed, traffic patterns were based on specific haul route information, airline passenger survey information, and regional population distributions. Detailed information regarding construction-related traffic distribution patterns is presented in Appendix P (section on construction vehicle haul routes and distributions beginning on page 148 of the pdf).

**LAMP-PC00021-13**

**Comment:** - This DEIR is silent on this matter but it deserves to be noted. This project must at no time result in new streets or driveways that facilitate access to LAX from the north. This project must in no way result in added traffic or encourage "cut-through" traffic in the surrounding residential neighborhoods.

**Response:** As stated on Section 2.4.4 in Chapter 2, Description of the Proposed Project, of the Draft EIR, "[t]he proposed roadway improvements are designed to reduce congestion and enable passengers to more efficiently access LAX, provide direct connections from the local highways to the CONRAC and ITF East, and reduce traffic impacts to local communities." See also Response to Comment LAMP-PC00031-9, which is similar to this comment.

The proposed Project's LAX access roadways have been designed to optimize circulation to the proposed facilities without facilitating or encouraging cut-through traffic in surrounding neighborhood streets. See Section 2.4.4, Roadway Improvements, in Chapter 2, Description of the Proposed Project, of the Draft EIR. On the contrary, the proposed Project consolidates the various rental car agencies that are currently spread out in the neighborhoods into a consolidated rental car facility (CONRAC) with access and connections directly to the freeway system and adjacent major arterials. The proposed Project includes the extension of 98th Street between Aviation and La Cienega Boulevards in Manchester Square, which would intercept the traffic immediately to and from the freeways.

**LAMP-PC00021-14**

**Comment:** - The anticipated growth that is facilitated by this project will impact the community of Westchester in the business district on Sepulveda. Many LAX passengers can be seen walking to and from LAX and Westchester on Sepulveda Blvd. The anticipated increase warrants a "Pedestrian Plan" for Sepulveda Blvd. Improvements to the street landscaping, lighting, sidewalks and crosswalks are needed to make this area safer for the visiting LAX passengers.

**Response:** Please note that the proposed Project would not facilitate growth in passenger volume, which would occur with or without the proposed Project, as discussed in Response to Comment LAMP-AL00008-2.

Page 2-139 in Chapter 2, Description of the Proposed Project, of the Draft EIR discusses the pedestrian crossing at Sepulveda and Century Boulevards. Specifically it states the following: "Implementation of the proposed Project would change traffic patterns at the intersection of W.

Century Boulevard and Sepulveda Boulevard, which may affect the existing pedestrian route into the CTA to accommodate the changes in the access road system. Currently, pedestrians can cross Sepulveda Boulevard to walk into the CTA or walk down W. Century Boulevard to the office buildings and hotels located east of the CTA. LAWA would preserve a pedestrian connection between the CTA and W. Century Boulevard as part of the proposed Project, through either an at-grade crossing or future pedestrian bridge." Thus, LAWA is committed to preserving pedestrian access into the CTA.

Because different phases of the proposed Project would affect access at Sepulveda and Century Boulevards, pedestrian access across Sepulveda Boulevard may also change. However, LAWA is aware of the interest and desire to maintain a pedestrian crossing and is developing plans to ensure that pedestrian access is maintained at all times.

In addition, LAWA has developed Design Guidelines for the LAX Landside Access Modernization Program facilities (Appendix B of the Draft EIR) that include detailed pedestrian, streetscaping, lighting and signage design standards. These standards would be applied in the final design of all the facilities proposed as part of the LAX Landside Access Modernization Program Project and would address the concerns mentioned in the comment.

As discussed on pages 4.12-153 and 4.12-167 of the Draft EIR, impacts to bicycle and pedestrian facilities would be less than significant. As discussed on page 4.12-153, the proposed Project consists of roadway and transportation improvements and construction of facilities that would facilitate movement of passengers at LAX; the proposed Project would not generate any additional new trips. The proposed Project would provide additional pedestrian facilities, bike paths and bike facilities for utilization by visitors and employees. As indicated in Section 2.2 of the Draft EIR, one of the inherent objectives of the proposed Project is to provide and enhance new access options for all modes of travel. While the proposed LAX Landside Access Modernization Program incorporates many features for pedestrians, those features are concentrated around Century Boulevard and access to the businesses along Century Boulevard to and from the Consolidated Rental Car Facility, the ITF East, and the ITF West. The proposed Project components would be unlikely to result in any significant increase in pedestrian movements to Sepulveda Boulevard businesses located in Westchester that could not be accommodated along existing sidewalks.

**LAMP-PC00021-15**

**Comment:** - The Consolidated Rental Car Facility (ConRac) will be built in the areas known as Belford and Manchester Square. The DEIR indicates that there are 80 homeless individuals who live in the area as per the 2015 LAHSA homeless count. This number may have been correct at that time but grossly understates the current condition of the area. A current unofficial count indicates that the homeless population is more than twice that at roughly, at least 200. Other than underestimating the number of people directly impacted, the DEIR is silent on this enormous social impact on the area. The DEIR concludes that there is not a "substantial number of people" being displaced and that the impacts will be "less than significant". The NCWP strongly disagrees with these conclusions. There are a "substantial" number of people who are being impacted by this project and this should require that LAWA participate financially in the construction of transitional and replacement housing.

**Response:** The content of this comment is similar to comment LAMP-AL00002-7; please refer to Response to Comment LAMP-AL00002-7.

**LAMP-PC00021-16**

**Comment:** We reiterate the need for additional time for a thorough review of the enormous document that is this DEIR. Thank you for the opportunity to comment on this important and much needed project.

**Response:** LAWA provided a 60-day review period for the LAX Landside Access Modernization Program Draft EIR. Section 21091(a) of the Public Resources Code requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. (See also State CEQA Guidelines Section 15105.) The review period for the LAX Landside Access Modernization Program Draft EIR provided an additional 15 days for public comment beyond the requirements of CEQA.

## LAMP-PC00022 Sevilla, Virgil None Provided 10/28/2016

**LAMP-PC00022-1**

**Comment:** Thank you for extending the comment period and hosting the public workshop.

**Response:** LAWA provided a 60-day review period for the LAX Landside Access Modernization Program Draft EIR. Section 21091(a) of the Public Resources Code requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. (See also State CEQA Guidelines Section 15105.) The original 45 day review period for the LAX Landside Access Modernization Program Draft EIR was extended to provide an additional 15 days for public comment beyond the requirements of CEQA.

**LAMP-PC00022-2**

**Comment:** It was a pleasure to meet Steve at the Flight Path Learning Center. Let the builders of the APM build an MPM-mini people mover from 1 side of the tunnel to the other for FREE. Let them know you are seriously considering Elon Musks Tube system which is environmentally friendly and very efficient and a tokyo based company that would like to top their bullet train. Real space age type of transpo to go with our theme bldg not some 1970s replica of an electric train. And they are willing to throw in for FREE a mini version to help solve the safety concerns of our tunnel. See if they dont come running to do some measurements. Drop a name and get it going Steve. The magic word is FREE. Just dont allow another life to be taken or ruined by that place in the future and you will feel it was worth extending the comment period. Sincerely, Virgil

**Response:** The commentor suggests that LAWA consider a mini people mover connecting the north and south sides of the Sepulveda tunnel for pedestrians utilizing a tube system, similar to the HyperLoop discussed in Response to Comment LAMP-PC00005-2. The HyperLoop is a proposed method of travel that would transport people at 745 miles per hour between distant locations. However, as discussed in the Response to Comment LAMP-PC00005-2, the application of this technology through the Sepulveda Tunnel would not be feasible, even if it were to be selected as a test project and constructed for free.

LAWA has taken into consideration pedestrian movements and improvements consistent with the City of Los Angeles plans to provide enhanced pedestrian connections to the LAX Landside Access Modernization Program components such as the Intermodal Transportation Facility (ITF) East and ITF West. Sepulveda Boulevard is a state-owned facility and Caltrans strives to implement pedestrian movements consistent with the City of Los Angeles plans as well. As noted in the comment, pedestrian movement through the Sepulveda Boulevard tunnel is challenging and, therefore, it is restricted. The addition of a pedestrian pathway would require the

reconstruction of the entire tunnel. Pedestrians instead are encouraged to use other parallel routes such as Aviation Boulevard.

## LAMP-PC00023 Mastroly, Frank None Provided 10/31/2016

**LAMP-PC00023-1**

**Comment:** I think it is "Back to the Drawing Board" for your LAMP APM project. I assume you are well aware of all of the other mayor projects being planned for LAX. However, your CTA APM stations and pedestrian walkways do not seem to take other projects into consideration. In particular, your CTA APM stations and pedestrian walkway locations, at least for Terminals 1, 2, and 3, bear little resemblance to what is required to feed these three terminals. Specifically: The West CTA APM station and pedestrian walkways do not serve the proposed Midfield Concourse which whose DEIR shows an underground APM station nor do they connect with the proposed Terminal 3.5 ticketing area near the TBIT. Your LAMP DIER does not even address access for the proposed Midfield Concourse. The Center CTA APM station and pedestrian walkways do not directly connect with the proposed Terminal 2.5 ticketing area between Terminals 1 and 2. The LAMP DEIR shows a pedestrian passage between the Center CTA APM station and the south-east corner of Terminal 2 and no direct connection to Terminal 3. For the East CTA APM station, your LAMP DEIR shows a pedestrian passage connected to the south-east corner of Terminal 1 and no connection to proposed Terminal 1.5. In fact, this APM station appears to serve only Terminals 7 and 8. Overall. I truly wonder if somehow the right hand does not know what the left hand is doing. There really needs to be a meeting among the "powers that be" to resolve these inconsistencies before anything is locked in concrete.

**Response:** CTA APM stations were sized and placed according to future projected demand at LAX. As part of the overall modernization program at LAX (separate from the LAX Landside Access Modernization Program), LAWA is working to integrate all terminal facilities and create a unified campus. However, as stated on page 2-47 in Chapter 2, Description of the Proposed Project, of the Draft EIR, "the precise locations and lengths of pedestrian and moving walkways are subject to change during the design process." Final design and location of the vertical cores and pedestrian walkways would be coordinated with other on-going projects at LAX, including those listed in Table 3-1 in Section 3.4, Development Setting, of the Draft EIR (see pages 3-9 through 3-12).

The LAX Landside Access Modernization Program addresses facilities entirely within the landside area of the Airport (see Response to Comment LAMP-PC00005-16). The Midfield Satellite Concourse (MSC) is planned for construction within the airside area, to the west of the Tom Bradley International Terminal (TBIT). As stated in the MSC Final EIR,[1] an underground airside APM alignment would connect the MSC to existing or proposed passenger processing facilities. Direct access to the MSC would not be provided through the LAX Landside Access Modernization Program. It should be noted that approval of the MSC and certification of the MSC Final EIR, which occurred in July 2014, only included the tunnels for an airside APM, not the APM system itself. Any additional APM planning would need to undergo further project-level CEQA review prior to construction. However, this project is separate and independent from the LAX Landside Access Modernization Program. As part of the MSC North project (construction of the northern half of the MSC), LAWA will include a passenger tunnel between the MSC North and the Tom Bradley International Terminal. While an APM is not included as part of the MSC North project, an APM was included as part of the Program analysis of the full build-out of the MSC. Programming and environmental analysis of the full build-out of the MSC has not commenced.

[1] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse, (SCH 2013021020), June 2014, page 2-34.

## LAMP-PC00024 Kolla, Peter Four Points by Sheraton, Los Angeles International Airport 11/11/2016

**LAMP-PC00024-1**

**Comment:** We are submitting this comment letter to Los Angeles World Airports ("LAWA") regarding the above-referenced Draft Environmental Impact Report ("DEIR") for the Landside Access Modernization Program ("LAMP").

Our property, Four Points by Sheraton LAX is located in the "Landside" area, at 9750 Airport Blvd. Los Angeles, CA 90045.

We have concerns about and provide comments on these issues:

Shuttle Issues:

We currently operate a shuttle into the Central Terminal Area ("CTA") to serve our customers and guests. Under the EIR with the implementation of "LAMP," it appears that we will no longer be allowed to pick up and drop off in the CTA, but instead will be limited to the lntermodal Transportation Facility West ("ITF West").

If the goal under LAMP implementation is to restrict vehicles within the CTA to reduce traffic congestion, it seems contrary to common sense that our shuttle buses - which hold scores of passengers - would be restricted from CTA access, while private cars, taxis, Lyft, Uber, limousines, which often carry only one or two passengers, would still be allowed access to the CTA.

Our comment and request is that LAWA reconsider this restriction to our shuttle access to the CTA under the LAMP implementation. Our shuttles are "aggregators" of passengers, whereas taxis, Lyft, Uber and limousines typically transport only one or two passengers per trip.

**Response:** The proposed Project, as described in Section 2.4 of Chapter 2, Description of the Proposed Project, of the Draft EIR provides:

- Facilities for consolidating rental cars, eliminating rental car shuttles and providing direct access to an Automated People Mover (APM) station;
- Facilities for all private parking shuttles and hotel shuttles to pick-up and drop-off patrons in an exclusive commercial vehicle rotary with direct access to an APM station at the ITF West;
- Facilities for all charter buses, super shuttles and other buses to pick-up and drop-off patrons in exclusive commercial vehicle rotaries with direct access to an APM station at the ITF East;
- Facilities for automobiles to park, pick-up and drop-off passengers also with direct access to an APM station; and
- Facilities for limousines, taxis, and transportation network carriers (TNC) to pick-up and drop-off passengers also with direct access to an APM station

All these facilities are provided at strategic locations with convenient access to freeways and major arterials in the vicinity of LAX. These facilities consolidate both automobiles and aggregators of trips (as the commentor notes in the comment) including shuttles and buses and provide grade-separated and direct access to the APM stations. All these passengers, visitors and employees would then be collectively transported on a modern APM mass transit system (with time-certain travel) to the three stations within the CTA and then to the terminals using bridges with moving walkways to the various levels of each of the terminals.

The designs of the ITF East and ITF West facilities include commercial vehicle rotaries to optimize access to the facilities. Access considerations focused on the direction and path of travel of the potential vehicle modes that would utilize each facility. See Section 2.4.2.1.3 of the Draft EIR for a discussion of the roadway modifications for the ITF West and Section 2.4.2.1.4 for a discussion of pedestrian access to the ITF West. See page 2-105 in Chapter 2 of the Draft EIR for a discussion of roadway modifications for the ITF East and page 2-109 for a discussion of pedestrian access for the ITF East. The policy changes contemplated as part of the proposed Project to direct commercial vehicle modes to specific ITFs would be informed by these design considerations as well as consideration of the requests and desires of all the various operators and users.

Section 2.4.6, Transportation Policies at LAX, in Chapter 2, Description of the Proposed Project, of the Draft EIR describes the existing transportation policies at LAX and the policy changes that LAWA may establish at LAX. These could include changes to fees, pricing, licenses, traffic patterns, and agreements with various commercial vehicle operators at LAX, as well as fees and prices for parking at LAX facilities. Additionally, LAWA may implement tolls for commercial vehicle operators and potentially to the public to access Airport facilities if needed to manage traffic during peak periods and for incident management. The Draft EIR states, in Section 2.4.6.1, on page 2-144, that, "[t]o reduce congestion on the CTA roadways, LAWA would update the LAX Ground Transportation Permit Program to allow and/or require commercial operators to pick-up and drop-off passengers at the ITF East and ITF West. Concurrently, LAWA would restrict access to the CTA for some commercial operators. LAWA would also institute pricing differential strategies to encourage commercial vehicle operators to pick-up and drop-off passengers at the ITF East and the ITF West." Section 2.4.6.2 of the Draft EIR, also on page 2-144, states that, "[w]ith implementation of the proposed Project, changes to the LAX Ground Transportation Permit Program, and implementation of pricing differential strategies, LAWA would manage the Project facilities to induce future daily passenger mode share shifts, with most commercial vehicle operators picking-up and dropping-off passengers at the ITF East and ITF West. LAWA would manage the facilities and Airport traffic to effectuate a shift of up to approximately 49 percent of the Airport passenger pick-up and drop-off from the CTA to the ITF East, ITF West, and CONRAC." Additional language on traffic management at the ITF West (Section 2.4.6.2.1 of the Draft EIR) and ITF East (Section 2.4.6.2.2), describes the actions that LAWA may take to encourage use of these facilities and a shift in traffic from the CTA. However, it should be noted that nowhere does the Draft EIR state that specific commercial vehicles would all be barred from operating within the CTA.

The operational assumptions identified in Tables 4.12.1-8 and 4.12.1-9 on pages 4.12-31 and 4.12-32 (for 2024 conditions) and Tables 4.12.1-10 and 4.12.1-11 on pages 4.12-34 and 4.12-35 (for 2035 conditions) in Section 4.12.1, On-Airport Transportation, of the Draft EIR, were assumptions used in the traffic analyses to analyze traffic conditions with approximately 48 percent of the traffic shifted outside of the CTA. LAWA will be evaluating the appropriate actions and incentives to take to effect this shift in traffic to ensure that the investment they are making in improving the landside access system at LAX is successful. LAWA recognizes that there are a number of ways that a shift in approximately 48 percent of vehicle traffic can be achieved; LAWA will continue to coordinate with the affected parties and will need to seek approval from the Board

of Airport Commissioners to implement any changes to the existing transportation policies at LAX. From a traffic perspective, an alternative to evaluate different assumptions about where different commercial modes operate would not meaningfully change the traffic analyses, or reduce or avoid any significant impacts, as presented in Section 4.12.1, On-Airport Transportation, and Section 4.12.2, Off-Airport Transportation, of the Draft EIR.

**LAMP-PC00024-2**

**Comment:** In the EIR's Table 17 of Appendix O of the Off-Airport Traffic Study, the table contains vehicle occupancy numbers during peak travel times that appear to be too low. Our shuttles are quite full during peak travel periods, despite what Table 17 reflects. Our comment and request is that LAWA re-examine these vehicle occupancy assumptions for shuttles during peak periods, and clarify or correct Table 17, which appears to be flawed.

**Response:** Vehicle occupancy estimates represent an average number of passengers/vehicle over the peak hour and in the case of hotel shuttles include vehicles of various sizes. Section 4.12.1.2.4, Vehicle Trip Generation and Distribution Model, of the Draft EIR provides a detailed description of how the vehicle occupancy estimates were developed and their importance in the calibration of the vehicle trip generation and distribution model.

It is important to note that the bases for the calculation of these vehicle occupancies were the most recent comprehensive traffic and passenger data sets collected at LAX. Also, as part of the calibration process, vehicle occupancies were one of the factors adjusted to refine the arithmetic relationship which allowed the vehicle trip generation and distribution model to use future passenger volumes to estimate future corresponding vehicle volumes.

The purpose of developing the vehicle trip generation and distribution model is to have a tool that accurately estimates future vehicle volumes based on a future passenger volume. The trip generation model uses factors such as passenger arrival characteristics, vehicle volumes, mode split (i.e., the proportion of traffic volume composed of various modes including private vehicles, taxicabs, limousines, etc.), and vehicle occupancy characteristics to develop relationships between each of these factors. The estimated passenger mode choice percentages and vehicle occupancy factors used in the trip generation model for both the passenger arrivals peak hour (8:18 p.m. – 9:18 p.m.) and departures peak hour (6:16 a.m. – 7:16 a.m.) were developed from data collected as part of this Project, including a comprehensive 2014 Central Terminal Area (CTA) Traffic data collection effort (Appendix N of the Draft EIR) and the LAX 2011 Passenger Survey.[1] Before the model could be used to estimate future peak hour traffic volumes, it was necessary to calibrate the model to ensure that the results would reliably predict actual observed traffic conditions as represented by the balanced roadway volumes. This process involved comparing model output for the departures peak hour and the arrivals peak hours with roadway and intersection traffic data from the balanced roadway network.

While individual hotel shuttle operators may sometimes observe higher peak hour vehicle occupancies than those presented in Table 17 of Appendix O, minor changes to the vehicle occupancy factors for hotel and rental car shuttles would not affect traffic conditions. As noted in Section 4.12.1.2.4, the model has been calibrated to match observed traffic conditions at LAX.

Furthermore, the on-Airport traffic analysis is based upon counts collected during July and August, which represent the peak month for Airport-related traffic around LAX (Draft EIR Section 4.12.1.1). It is recognized that individual businesses, schools, and other traffic generators may produce localized peak traffic conditions that may differ from the airport. For example, each individual traffic generator would likely experience peak seasons and produce peak hour conditions at their primary access locations that would differ from that of the Airport and the

overall study area. However, given the large scale of the traffic study analysis area, it is important to analyze the roadway network for the overall ambient peak condition, which is influenced by the Airport as the largest trip generator within the study area. It would not be feasible to study the traffic peaking characteristics of every trip generator within the geographic scope of the LAX Landside Access Modernization Program Draft EIR. As discussed under CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible." (See also *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 [rejecting argument "that the EIR should have specified whether trucks sometimes enter and leave the site "unevenly" over time. We hold that such minute detail was not required in the analysis in question."]).

[1] Unison Consulting, Inc., Los Angeles International Airport 2011 Passenger Survey, conducted between August 22 and August 28, 2011 (peak) as well as October 17 and October 24, 2011 (non-peak), August 2012.

**LAMP-PC00024-3**

**Comment:** The EIR indicates that private shuttles must *only* use the ITF West. Our comment and request is that private shuttles be allowed access to both of the ITFs, as well as to the CTA. If the goal is to reduce traffic congestion, then if one facility is full or congested, the shuttle buses should be allowed the flexibility of dropping off and picking up at any of these facilities.

**Response:** Please see Response to Comment LAMP-PC00024-1 above. As noted in Response to Comment LAMP-PC00024-1, the operational assumptions identified in Tables 4.12.1-8 and 4.12.1-9 on pages 4.12-31 and 4.12-32 (for 2024 conditions) and Tables 4.12.1-10 and 4.12.1-11 on pages 4.12-34 and 4.12-35 (for 2035 conditions) in Section 4.12.1, On-Airport Transportation, of the Draft EIR, were assumptions used in the traffic analyses to analyze traffic conditions with approximately 48 percent of the traffic shifted outside of the CTA. LAWA will be evaluating the appropriate actions and incentives to take to effect this shift in traffic to ensure that the investment they are making in improving the landside access system at LAX is successful. LAWA recognizes that there are a number of ways that a shift in approximately 48 percent of vehicle traffic can be achieved; LAWA will continue to coordinate with the affected parties and will need to seek approval from the Board of Airport Commissioners to implement any changes to the existing transportation policies at LAX.

Given the large number and types of commercial vehicle operators at LAX, it becomes a wayfinding issue if similar shuttle operators are operating in multiple locations. For passenger wayfinding it is important that all operators of a type of shuttle are operating in one location (for example hotel shuttles or FlyAway buses). If some commercial vehicle operators are dropping-off and picking-up in one location and other similar commercial vehicle operators are picking-up and dropping-off in another location, it becomes very difficult for the passenger to figure out where to go. For these reasons, the traffic analysis reasonably assumed that all commercial vehicle operators for a certain type of shuttle were operating at a single location.

## LAMP-PC00025 Hart, Jeff Los Angeles Airport Marriott 11/14/2016

**LAMP-PC00025-1**

**Comment:** We are submitting this comment letter to Los Angeles World Airports ("LAWA") regarding the above-referenced Draft Environmental Impact Report ("DEIR") for the Landside Access Modernization Program ("LAMP").

Our property, the Los Angeles Airport Marriott is located in the "Landside" area, at 5855 West Century Blvd., Los Angeles, CA 90045.

We have concerns about and provide comments on these issues:

Shuttle Issues:

We currently operate a shuttle into the Central Terminal Area ("CTA") to serve our customers and guests. Under the EIR with the implementation of "LAMP," it appears that we will no longer be allowed to pick up and drop off in the CTA, but instead will be limited to the lntermodal Transportation Facility West ("ITF West").

If the goal under LAMP implementation is to restrict vehicles within the CTA to reduce traffic congestion, it seems contrary to common sense that our shuttle buses - which hold scores of passengers - would be restricted from CTA access, while private cars, taxis, Lyft, Uber, limousines, which often carry only one or two passengers, would still be allowed access to the CTA.

Our comment and request is that LAWA reconsider this restriction to our shuttle access to the CTA under the LAMP implementation. Our shuttles are "aggregators" of passengers, whereas taxis, Lyft, Uber and limousines typically transport only one or two passengers per trip.

**Response:** The comment is the same as comment LAMP-PC00024-1; please refer to Response to Comment LAMP-PC00024-1.

**LAMP-PC00025-2**

**Comment:** In the EIR's Table 17 of Appendix O of the Off-Airport Traffic Study, the table contains vehicle occupancy numbers during peak travel times that appear to be too low. Our shuttles are quite full during peak travel periods, despite what Table 17 reflects. Our comment and request is that LAWA re-examine these vehicle occupancy assumptions for shuttles during peak periods, and clarify or correct Table 17, which appears to be flawed.

**Response:** The comment is identical to comment LAMP-PC00024-2; please refer to Response to Comment LAMP-PC00024-2.

**LAMP-PC00025-3**

**Comment:** The EIR indicates that private shuttles must *only* use the ITF West. Our comment and request is that private shuttles be allowed access to both of the ITFs, as well as to the CTA. If the goal is to reduce traffic congestion, then if one facility is full or congested, the shuttle buses should be allowed the flexibility of dropping off and picking up at any of these facilities.

**Response:** The comment is identical to comment LAMP-PC00024-3; please refer to Response to Comment LAMP-PC00024-3.

## LAMP-PC00026 Rostek, Jeff Hyatt Regency Los Angeles International Airport 11/8/2016

**LAMP-PC00026-1**

**Comment:** On behalf of Hyatt Regency Los Angeles International Airport and Quik Park Parking Garage, we are submitting the following comment letter to Los Angeles World Airports ("LAWA") regarding the above-referenced Draft Environmental Impact Report ("DEIR") for the Landside Access Modernization Program ("LAMP").

1. The DEIR indicates in the Appendix O Report that **shuttle access** to the Central Terminal Area ("CTA") will be restricted (eliminated) for some classes of commercial operators, to encourage pick-up and drop-off at the ITF West, and to reduce congestion in the CTA. Appendix O Report reads: *"LAWA would restrict access to the CTA for some classes of commercial operators such as shared ride vans, scheduled service buses, courtesy shuttles, and pre-arranged charter carriers. LAWA **may** also institute pricing differential strategies to encourage other commercial vehicle operators such as taxis, limousines and … Uber and Lyft .. to pick up and drop off passengers at the ITF West. …..Approximately 16 percent of all airport traffic would utilize the ITF West, which is assumed to consist of charter vans, taxis, limos and paid rides, **parking patrons, hotel shuttles**, and private vehicle pick ups and drop offs."*

We are concerned about the impacts to our businesses, which currently have shuttle buses which are allowed to pick up and drop off passengers in the CTA area.

If the goal under LAMP implementation is to restrict vehicles within the CTA to reduce traffic congestion, it seems counter-intuitive that per the DEIR, shuttle buses which hold scores of passengers, including the hotel shuttles and off-airport parking shuttles, would be restricted under any circumstances from CTA access, while private cars, taxis, Lyft, Uber, limousines – which often carry only one or two passengers – would still be allowed access to the CTA. **We request that LAWA reconsider this restriction on hotel and off-airport parking shuttles accessing the CTA under the LAMP implementation.** Hotel shuttles and off-airport parking shuttles are "aggregators" of passengers, whereas taxis, Lyft, Uber and limousines typically transport only one or two passengers per trip.

**Response:** The comment is similar to comment LAMP-PC00024-1; please refer to Response to Comment LAMP-PC00024-1.

**LAMP-PC00026-2**

**Comment:** Further, in the DEIR's Table 17 of Appendix O of the Off-Airport Traffic Study, the table contains vehicle occupancy numbers that appear to be too low for some modes of transportation. Table 17 shows that "Vehicle Occupancy" for "Private Parking Shuttles is only 1.9 passengers on Arrival Level 1, and only 3.4 passengers on Departure Level 2. Similarly, Table 17 shows "Vehicle Occupancy" for "Hotel Shuttles" is only 3.5 passengers on Arrival Level 1 and only 3.9 passengers for Departure Level 2. These Vehicle Occupancy numbers, per Table 17's notes, reflect that these passenger numbers/vehicle occupancy numbers are during "**arrivals peak period**" and "**departures peak period**." The reality is that both Private Parking Shuttles and Hotel Shuttles operate close to full and sometimes standing room only, during peak periods. **We request** that LAWA re-examine these vehicle occupancy assumptions for Private Parking Shuttles and for Hotel Shuttles during peak periods, and clarify or correct Table 17.

**Response:** The comment is similar to comment LAMP-PC00024-2; please refer to Response to Comment LAMP-PC00024-2.

**LAMP-PC00026-3**

**Comment:** An alternative, which we request is for LAWA to analyze prior to circulation of the FEIR, to continue to allow **curbside access in the CTA** to commercial vehicles carrying more passengers, while restricting private vehicles, taxis, Lyft, Uber and limousines to dropping off and picking up passengers on the first level of each CTA parking structure **for a fee**, or alternatively those private vehicles, taxis, Lyft, Uber.

**Response:** The comment is similar to comment LAMP-PC00030-5; please see Response to Comment LAMP-PC00030-5.

**LAMP-PC00026-4**

**Comment:** 2. The DEIR contained little discussion regarding a **possible pedestrian bridge over Sepulveda Boulevard** that would link Century Boulevard properties, businesses and their patrons to the CTA. The only discussion was in the FEIR was that "LAWA would preserve a pedestrian connection between the CTA and W. Century Boulevard as part of the proposed Project, through **either** an at-grade crossing or future pedestrian bridge." A pedestrian bridge linking Century Boulevard across Sepulveda and ultimately to the CTA would provide much **greater safety to pedestrians** than an at-grade pedestrian crossing, and is a priority to us and other owners and businesses who serve the airport. **We request** that the FEIR reflect further analysis including a conceptual pedestrian bridge plan in the FEIR.

**Response:** Page 2-139 in Chapter 2, Description of the Proposed Project, of the Draft EIR discusses the pedestrian crossing at Sepulveda and Century Boulevards. Specifically it states the following: "Implementation of the proposed Project would change traffic patterns at the intersection of W. Century Boulevard and Sepulveda Boulevard, which may affect the existing pedestrian route into the CTA to accommodate the changes in the access road system. Currently, pedestrians can cross Sepulveda Boulevard to walk into the CTA or walk down W. Century Boulevard to the office buildings and hotels located east of the CTA. LAWA would preserve a pedestrian connection between the CTA and W. Century Boulevard as part of the proposed Project, through either an at-grade crossing or future pedestrian bridge." Thus, LAWA is committed to preserving pedestrian access into the CTA. Pedestrians currently safely traverse this intersection, which is marked with crosswalks and is equipped with pedestrian crossing lights that indicate the time remaining to cross the intersection. Implementation of the proposed Project would not cause any additional pedestrian safety issues.

Because different phases of the proposed Project would affect access at Sepulveda and Century Boulevards, pedestrian access across Sepulveda Boulevard may also change. However, LAWA is aware of the interest and desire to maintain a pedestrian crossing and is developing plans to ensure that pedestrian access is maintained at all times. LAWA is also aware of potential interest in the construction of a pedestrian bridge across Sepulveda Boulevard and has examined some concepts for a bridge. However, a number of issues with construction of a bridge exist, including whether there is sufficient right-of-way for a bridge, how high a pedestrian bridge would have to be, and where it would land. LAWA is also considering whether it would be feasible to incorporate a pedestrian walkway on the relocated elevated Phase 2 roadways. However, at this time, LAWA cannot commit to construction of a pedestrian bridge, but will continue to work with adjacent property owners and community groups on future pedestrian crossings at Sepulveda and Century Boulevards. Subsequent approvals may be subject to additional project level environmental review.

**LAMP-PC00026-5**

**Comment:** We look forward to the above issues raised to LAWA to be addressed in the FEIR in much greater detail, and where appropriate for additional mitigation measures to be recommended.

**Response:** Please see Responses to Comments LAMP-PC00026-2 through LAMP-PC00026-4 above regarding the issues raised on the Draft EIR. The issues raised in the above comments do not create the need for additional EIR mitigation measures.

## LAMP-PC00027 Tong, Maria None Provided 11/14/2016

**LAMP-PC00027-1**

**Comment:** It is good to know there is a program [Landside Access Modernization Program] looking into the traffic congestion around the LAX area, where the drop-offs and pick-ups of travelers have already increased, along with the air traffic itself.

There are a few suggestions I would like to submit to the Committee in response, from the voice of a local El Segundo resident.

Not to have those heavy engine aircraft [747 or equivalents, and Air Cargo] fly over the top of residential houses after 10 pm. Even though we have double glass windows or doors, when those heavy engine aircraft take off at a LOW altitude and fly over the top of our house, that noise can wake you up in the middle of the night, and the vibration that occurs makes the structure of the house creak. This creaking noise can also wake you up and causes me to be concerned about damage in the long run. These aircraft take-offs are really too low.

Those heavy engine aircraft always fly LOW altitude when they fly over the El Segundo residential houses before heading towards the ocean. The distance is almost under one mile from my house. The heavy engine noise might well be over the limit of human hearing protection. One cannot even work in the yard with this kind of noise on a constant basis.

To protect the value of El Segundo Estate and the people who live in El Segundo, we need your help and support.

Please allow the development of this Modernization Program to be not only environmental improvement for the ground, but also to Modernize the air traffic environment for people who live in the City of El Segundo, so we can love and be proud to have LAX, the world class airport, as our neighbor.

Thank you for your consideration, concern and support of your neighbors.

**Response:** The LAX Landside Access Modernization Program addresses ground access improvements. The proposed Project would not cause any changes to aircraft operations; departures and arrivals runway utilization; or runway configuration. Therefore, noise from aircraft operations would not be affected by the proposed Project and was not addressed as a proposed Project impact in the Draft EIR. Please see Section 6.3.2 of the Draft EIR for a discussion of the rationale for the conclusion that projected future increases in passenger activity levels forecasted by the Federal Aviation Administration (FAA) and the Southern California Association of Governments (SCAG) are anticipated to be realized with or without the proposed Project.

Los Angeles World Airports (LAWA) is committed to minimizing noise impacts in neighboring communities from aircraft operating at LAX. Since 1959, LAWA has developed and implemented noise abatement programs, sought partnership-based solutions and worked with stakeholders in a cooperative and collaborative manner. In particular, LAWA has worked proactively with the Federal Aviation Administration (FAA) for many years to implement various noise abatement procedures.

For more information about LAWA's noise abatement programs and related information, please go to www.lawa.org/laxnoise.

## LAMP-PC00028 Shrier, Kevin TPS Parking Management, LLC 11/15/2016

**LAMP-PC00028-1**

**Comment:** We are submitting this comment letter to Los Angeles World Airports ("LAWA") regarding the above-referenced Draft Environmental Impact Report ("DEIR") for the Landside Access Modernization Program ("LAMP").

In addition to fully supporting those questions, issues and concerns set forth generally in that certain Comment Letter submitted by Gateway to Los Angeles, dated November 11, 2016, and specifically in paragraphs 1, 4, 5, 8 and 13, we have additional concerns about and provide comments on the following issues:

**Response:** Please see Responses to Comments LAMP-PC00028-2 through LAMP-PC00028-18 below which address the specific comments raised by the commentor. The Gateway to LA BID did not submit a comment letter on the Draft EIR dated November 11, 2016. It is assumed that the comment letter prepared by the Gateway LA BID that is referred to in this comment is dated November 15, 2016, which has been assigned comment letter number LAMP-PC00030; please see responses to comment letter LAMP-PC00030.

**LAMP-PC00028-2**

**Comment:** SHUTTLE ACCESS ISSUES:

As LAWA and the Board of Airport Commissioners are aware, we currently operate shuttle fleets into the Central Terminal Area ("CTA") to serve our customers and guests utilizing each of our facilities located at 9101 Sepulveda Boulevard ("Sepulveda Parking Spot") and 5701 Century Boulevard ("Century Parking Spot"). Under the DEIR with the implementation of "LAMP," it appears that neither of Century Parking Spot or Sepulveda Parking Spot would be allowed to pick up and drop off in the CTA, but instead will be limited to the Intermodal Transportation Facility West ("ITF West"). This is problematic and concerning to us for a number of reasons, set forth below.

If the goal under LAMP implementation is to restrict vehicles within the CTA to reduce traffic congestion, it seems contrary to common sense that our shuttle buses - which hold scores of local passengers - would be restricted from CTA access, while private cars, taxis, Lyft, Uber, limousines, which often carry only one or two passengers, would still be allowed access to the CTA.

**Response:** The comment is similar to comment LAMP-PC00024-1; please refer to Response to Comment LAMP-PC00024-1. Both off-Airport parking shuttles and hotel shuttles were assumed to operate

at the ITF West in the Draft EIR traffic impact analyses, with approximately 48 percent of the traffic assumed to be shifted outside of the CTA. LAWA will be evaluating the appropriate actions and incentives to take to effect this shift in traffic to ensure that the investment they are making in improving the landside access system at LAX is successful. LAWA recognizes that there are a number of ways that a shift in approximately 48 percent of vehicle traffic can be achieved; LAWA will continue to coordinate with the affected parties and will need to seek approval from the Board of Airport Commissioners to implement any changes to the existing transportation policies at LAX.

**LAMP-PC00028-3**

**Comment:** In addition to our belief that curtailing CTA access for passenger aggregators like our shuttles is not sound policy, it is not clear how The Parking Spot shuttles from the Sepulveda Parking Spot would even access ITF West. This underscores another significant concern for us in that the DEIR, while it is not explicitly clear, seems to include a prohibition against commercial vehicles utilizing ITF East. Again, we feel strongly that local passenger aggregating shuttles such as those used in our operations should still be permitted to access the CTA, but if that definitively will not be the case, it is absolutely not clear to us why there would be any prohibitions against commercial shuttle use of the ITF East, which in the case of the Sepulveda Parking Spot would be the ITF located much closer in proximity than the ITF West.

Our comment and request is that LAWA reconsider this restriction to our shuttle access to the CTA under the LAMP implementation, and in the alternative, provide more information on whether commercial vehicles such as the shuttles utilized by the Sepulveda Parking Spot will have access to the more than just the ITF West (ideally the CTA but at a minimum ITF East). The DEIR indicates that private shuttles must *only* use the ITF West. Our comment and request is that private shuttles be allowed access to both of the ITFs, as well as to the CTA. If the goal is to reduce traffic congestion, then if one facility is full or congested, the shuttle buses should be allowed the flexibility of dropping off and picking up at any of these facilities.

**Response:** The comment is similar to comment LAMP-PC00024-3; please refer to Response to Comment LAMP-PC00024-3.

The parking shuttles from the Sepulveda Parking Spot located at the southwest corner of the intersection of Sepulveda Boulevard and Westchester Parkway can access the ITF West in one of several ways –

1. By traveling east along Westchester Parkway, turn right to New “A” Street and enter the commercial rotary at ITF West by turning left at the intersection of 96th Street and New “A” Street. The shuttle would be able to exit to Airport Boulevard turn left to Westchester Parkway and travel west to the Sepulveda Parking Spot.

2. By turning right from Westchester Parkway to Sepulveda Boulevard, travel south along Sepulveda Boulevard and turn left on to 96th Street and then proceeding straight to the ITF West Commercial Rotary. The shuttle would be able to exit and return to the Sepulveda Parking Spot as noted above.

It should be noted that the ITF West would be located approximately 2,000 feet southeast of the Sepulveda Parking Spot while the ITF East would be located approximately 6,000 feet southeast of the Sepulveda Parking Spot.

**LAMP-PC00028-4**

**Comment:** Finally, in the DEIR's Table 17 of Appendix O of the Off-Airport Traffic Study, the table contains vehicle occupancy numbers during peak travel times that appear to be, from our operational knowledge, much too low. Our shuttles are quite full during peak travel periods, despite what Table 17 reflects. Our comment and request is that LAWA re-examine these vehicle occupancy assumptions for shuttles during peak periods, and clarify or correct Table 17, which appears to contain inaccurate information. As we have routinely done in the past with regard to many issues, including this specific item regarding shuttle occupancy, we are more than willing to work with LAWA staff to determine data that we believe will more closely represent real time and life numbers.

**Response:** The comment is similar to comment LAMP-PC00024-2; please refer to Response to Comment LAMP-PC00024-2.

**LAMP-PC00028-5**

**Comment:** OFF-AIRPORT PRIVATE PARKING SHUTTLE ROUTES

Although Appendix W of the traffic impact analysis (TIA) provides an exhibit that identifies existing shuttle routes, there is no information in the DEIR that shows proposed shuttle routes and what the impact on shuttle routes will be due to the proposed changes to be made to 98th Street.

With implementation of LAMP, new shuttle routes will be required, however the DEIR does not disclose or discuss the proposed shuttle routes and what impact this would have to traffic flows on study area roadways and more specifically on 98th Street. Given the fact that our Century Parking Spot location's shuttles, guests and employees rely predominately on 98th Street for ingress and egress, this is very concerning. To underscore this point, the DEIR does not analyze the intersections of 96th Street at Sepulveda Boulevard, 98th Street at Sepulveda Boulevard, and New "A" Street at 98th Street which all may be impacted by the new shuttle routes that will be required to access the ITF and potentially the CTA.

**Response:** Section 2.4.2.1 of the Draft EIR provides detailed descriptions of the access and circulation systems associated with the Intermodal Transportation Facility West. As detailed in that section, access to the commercial rotary would be obtained from two separate locations - directly off of 98th Street between Airport Boulevard and New “A” Street as well as off of 96th Street at New “A” Street. Egress from the commercial rotary is also obtained at two locations – Airport Boulevard and 96th Street; and directly to 98th Street between Airport Boulevard and New “A” Street. For the Century Parking Spot shuttle, the proposed route would be coordinated at the time of final design of 98th Street improvements. The existing shuttle route could potentially be retained as it pertains to access/egress from the Century Parking Spot facility along the improved 98th Street.

The Century Parking Spot currently obtains access from Century Boulevard west of Bellanca Avenue; from Bellanca Avenue between Century Boulevard and 98th Street; and along 98th Street, west of Bellanca Avenue. Unlike what is stated in the comment that *“*Century Parking Spot location’s shuttles, guests and employees rely predominantly on 98$^{th}$ Street for ingress and egress*”*, actual observed traffic counts conducted at the three driveways serving the Century Parking Spot facility indicate that the Century Boulevard entrance is predominantly used for entering the parking facility, while the Bellanca Avenue driveway is predominantly used to exit the parking facility. The 98th Street driveway is predominantly used by the parking shuttles to transport passengers back and forth between the CTA and the Century Parking Spot facility.

Please see Response to Comment LAMP-PC00021-2 regarding the travel demand forecasting model developed for the proposed Project. As discussed therein, the Traffic Study's scope, assumptions, parameters and methodology were coordinated with Caltrans, City of Los Angeles, Los Angeles County Metropolitan Transportation Authority (Metro), Southern California Association of Governments (SCAG), County of Los Angeles, City of Inglewood, City of Culver City, City of El Segundo and LAWA at the commencement of the Study.

See Response to Comment LAMP-PC00028-6 below for responses related to intersections analyzed along W. 98th Street, as well as Sepulveda Boulevard and 98th Street. The Traffic Study included an analysis of the traffic anticipated to utilize 98th Street with Project conditions for both 2024 and 2035.

**LAMP-PC00028-6**

**Comment:** 98th Street extension traffic along the study area roadways will increase significantly as identified in Appendix W. Notwithstanding, the DEIR does not evaluate the potential effects of congestion due to the increase in traffic and how this would impact the intersection of 98th Street at Bellanca Avenue for which no operational level of service is disclosed in the DEIR. Given that the DEIR fails to disclose potential impacts to 98th Street at Bellanca Avenue, 96th Street at Sepulveda Boulevard, 98th Street at Sepulveda Boulevard, and New "A" Street at 98th Street it appears that the DEIR does not provide adequate mitigation for these impacted intersections and thus fails as a source of public disclosure pursuant to the California Environmental Quality Act (CEQA).

**Response:** The City of Los Angeles Traffic Study Policies and Procedures[1] provides direction relative to determining the scope of analysis locations for projects. The City's directive on page 15, specifically states the following: "When determining which intersections should be included in the impact analysis for development projects, only signalized intersections should be selected. Unsignalized intersections should be evaluated solely to determine the need for installation of a traffic signal or other traffic control device, but will not be included in the impact analysis. When choosing which un-signalized intersections will be reviewed, intersections that are adjacent to the project or those that are integral to the project's site access and circulation plan should be identified." As noted in Appendix O, Off-Airport Traffic Study, of the Draft EIR, the traffic study was prepared in accordance with the latest traffic study guidelines and requirements of the various jurisdictions within which intersections and/or roadway links are located (see page 20 of Appendix O).

The intersections noted in the comment are all unsignalized intersections. The same intersections of Bellanca Avenue at 98th Street, 98th Street at New "A" Street, and 96th Street at Sepulveda Boulevard are all proposed to be signalized as part of the proposed Project, and therefore no further analysis to determine the need for signalization is necessary. The intersection of 98th Street at Sepulveda Boulevard is also un-signalized and would not be altered by the proposed Project since it would not be used as a site access or circulation intersection by the Project, and therefore, no further analysis is necessary.

Please see Response to Comment LAMP-PC00021-2 regarding the travel demand forecasting model developed for the proposed Project. As discussed therein, the Traffic Study's scope, assumptions, parameters and methodology were coordinated with Caltrans, City of Los Angeles, Los Angeles County Metropolitan Transportation Authority (Metro), Southern California Association of Governments (SCAG), County of Los Angeles, City of Inglewood, City of Culver City, City of El Segundo and LAWA at the commencement of the Study and all requested analyses locations were included in the Study. The Project's Traffic Study provides all the required impact analyses consistent with CEQA requirements of all the affected jurisdictions.

In response to this comment, operational traffic analyses at 98th Street intersections at Concourse Way, Aviation Boulevard, Bellanca Avenue and New "A" Street, as well as the intersection of Sepulveda Boulevard and 96th Street, were also conducted using the Critical Movement Analysis (CMA)[2] methodology. For the City of Los Angeles study locations, including those shared with other jurisdictions, the CMA method of intersection capacity analysis was used to determine the intersection volume to capacity (V/C) ratio and corresponding level of service at the signalized study intersections. Level of service spreadsheets developed by LADOT were used to implement the CMA Circular 212 Method methodology. See Response to Comment LAMP-AL00012-5 for further information on these methodologies. The results of these analyses are provided in Table 1 below. As shown in the table, all five intersections would operate at levels of service LOS "D" or better under all future conditions with the proposed Project and Potential Future Related Development scenarios including signalization and the proposed Project conditions intersection geometry. As identified in Section 4.12.2.4.1 of the Draft EIR, significance thresholds for intersections within the City of Los Angeles are based on changes in volume/capacity ratios at signalized intersections. Because these intersections are currently unsignalized, the significance criteria does not apply. When a proposed project would cause traffic to increase at an unsignalized intersection such that backups would occur, the appropriate mitigation is to make the intersection signalized, which is what LAWA proposes to do as part of the proposed Project. Because all intersections, once signalized, would operate at LOS D or better, there would be no significant impact to these intersections.

Many of the adjacent roadway segments and key intersections would operate better with the proposed Project and mitigation measures, as indicated in Chapter VI, Figures 64A, 64B, 70A, 70B, 76A, 76B, 82A and 82B in Appendix O of the Draft EIR.

[1] Los Angeles Department of Transportation, Traffic Study Policies and Procedures, August 2014.

[2] Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, January 1980.

**Table 1**

**Summary of Intersection Level of Service Analysis**

| Intersection | Peak Hour | Future (2024) with Project Conditions | | Future (2035) with Project Conditions | | Future (2035) with Project and Related Development Conditions | |
|---|---|---|---|---|---|---|---|
| | | V/C | LOS | V/C | LOS | V/C | LOS |
| Bellanca Avenue & 98th Street | AM | 0.539 | A | 0.653 | B | 0.687 | B |
| | PM | 0.696 | B | 0.744 | C | 0.780 | C |
| Aviation Boulevard & 98th Street | AM | 0.674 | B | 0.735 | C | 0.767 | C |
| | PM | 0.823 | D | 0.857 | D | 0.895 | D |
| Concourse Way & 98th Street | AM | 0.547 | A | 0.564 | A | 0.652 | B |
| | PM | 0.736 | C | 0.750 | C | 0.867 | D |
| New 'A' Street & 98th Street | AM | 0.460 | A | 0.581 | A | 0.586 | A |
| | PM | 0.544 | A | 0.886 | D | 0.893 | D |
| Sepulveda Boulevard & 96th Street | AM | 0.726 | C | 0.733 | C | 0.735 | C |
| | PM | 0.747 | C | 0.830 | D | 0.832 | D |

**LAMP-PC00028-7**

**Comment:** Even more specifically, as identified in the DEIR, the traffic volumes on 98th Street west of Bellanca Avenue during the PM peak hour will increase from 225 trips for existing conditions to 1,625 trips under Future 2035 with LAMP conditions. This is over a 600% increase in traffic that would severely impact access to facilities on 98th Street including but not limited to the Century Parking Spot facility. Furthermore, the DEIR should have evaluated the operational level of service specifically at the Century Parking Spot location but failed to do so even though the traffic volumes for existing and future conditions are available and disclosed in the DEIR.

**Response:** As shown on Figure 10C on page 73 in Appendix O of the Draft EIR, the existing (baseline) traffic on W.98th Street east of Airport Boulevard is 225 trips. However, as shown on Figure 35C on page 253 in Appendix O of the Draft EIR, the project trips on W. 98th Street east of Airport Boulevard is 845 trips (not 1,625 trips), so the 600% increase assertion is not accurate. The 98th Street Options Analyses provided as Appendix W of the Traffic Study (starting on PDF page 10114 of Appendix O of the Draft EIR) details various options and analyzes operational performance at key intersections along the 98th Street corridor including the intersections of Bellanca Avenue and 98th Street and Aviation Boulevard and 98th Street. As shown on Exhibit W-5 on page 19 in Appendix W of Appendix O, existing traffic volumes on 98th Street west of Bellanca Avenue in the evening peak hour are 85 trips. Under the 2035 With Project condition (see Exhibit W-10 on page 25 in Appendix W of Appendix O), the peak hour evening trips on 98th Street west of Bellanca Avenue would be 590. An evaluation of all performance characteristics was performed and the preferred option for 98th Street Corridor was recommended in the Study.

Table 1 above presents the results of the operational analysis at all 98th Street locations. As can be seen, the intersection closest to the Parking Spot, 98th Street and Bellanca Avenue, is projected to operate at LOS "C" or better with the proposed Project under future conditions. As shown in Table 26B on page 225 in Appendix O of the Draft EIR, the intersection of Century Boulevard and Bellanca Avenue is projected to operate at LOS A during the peak hours under With Project conditions in 2035. As such, based on the LOS definitions provided in Table 4.12.2-2 in Section 4.12 of the Draft EIR, these intersections would operate at a good or better level of service. See also Response to Comment LAMP-PC00028-7.

**LAMP-PC00028-8**

**Comment:** Even more concerning is that the DEIR does not provide a queuing analysis on 98th Street with or without improvements. The queues on 98th Street are more likely than not to block access to existing driveways along the 98th Street corridor given the significant increase (over 600%) in forecasted volumes. In layman's terms, this means that not only will 98th Street have significant back-up but so too will the drive aisles inside of our Century Parking Spot location, causing significant customer dissatisfaction, environmental concerns due to increased vehicle idling not to mention likely insurmountable gridlock in getting into and out of our Century Parking Spot facility.

**Response:** Please see Response to Comment LAMP-PC000028-7 above regarding forecasted traffic volumes. Additionally, as also noted in the Response to Comment LAMP-PC00028-7, the LOS at the two closest intersections to the Century Parking Spot would operate at LOS A (Century Boulevard and Bellanca Avenue) or LOS C (Bellanca Avenue and 98th Street) during the peak hours. As such, based on the LOS definitions provided in Table 4.12.2-2 in Section 4.12 of the Draft EIR, these intersections would operate at a good or better level of service, and there would be no significant back-up at these intersections or on 98th Street that would impact access to the Parking Spot (LOS C = Good – occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles). LAWA has and will continue to work closely with interested stakeholders to coordinate access and circulation issues at the time of final design of the relevant facilities. With close coordination, LAWA's objective is to design and operate a

system configuration that optimizes performance while minimizing potential circulation and delay issues. LAWA presented the following exhibit (Figure 1) to the Parking Spot representatives and the Gateway to LA at a meeting in September 2016; Figure 1 shows conceptual 98th Street striping that would help meet this objective.

Additionally, it is worth noting that the Century Parking Spot obtains access from Century Boulevard west of Bellanca Avenue, 98th Street west of Bellanca Avenue and along Bellanca Avenue between Century Boulevard and 98th Street, which would allow vehicles within the Parking Spot facility to balance circulation to the existing street system as they currently do.

**LAMP-PC00028-9**

**Comment:** We strongly believe that the severe increase in traffic due to LAMP along 98th Street will provide for inadequate gaps for vehicles exiting the Century Parking Spot location and thus may also result in a safety concern for vehicles (including guests' vehicle and our shuttles) utilizing our driveway on 98th Street. The safety concerns are further exacerbated by the fact that the proposed roadway improvements on 98th Street will result in a complete elimination of the existing two-way left turn lane that currently provides a safe refuge for inbound and outbound vehicles making a turn on 98th Street. Vehicles wanting to make a left tum into or out of any driveways along 98th Street would now be required to cross two lanes of traffic and would not only block the through vehicle movements, causing delays, but could also result in a safety concern and an increase in automobile accidents (which will undoubtedly also cause delays). The FEIR should evaluate and address these safety issues along the numerous impacted driveways on 98th Street. As LAWA knows, if any new impacts are identified this could warrant recirculation of the DEIR pursuant to CEQA requirements.

**Response:** Please see Response to Comment LAMP-PC00028-8 above. As noted, the intersections located closest to the Century Parking Spot would operate at LOS C or better during peak periods under 2035 With Project conditions. Good LOS conditions, as defined in Table 4.12.2-2 in Section 4.12 of the Draft EIR, means occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles. As shown in Figure 1, hold bars can be painted on the street to keep the exit from the Century Parking Spot clear of any vehicles queuing at the light. Additionally, as stated on page 4.12-178 in Section 4.12.2 of the Draft EIR, the lane on the south side of 98th Street (closest to the Century Parking Spot) would only be used as a traffic lane during the evening peak period (roughly 4:00 p.m. to 6:00 p.m.). At all other times, this lane would be a loading zone lane. Based on the above analysis, the proposed Project would not cause significant traffic safety impacts along 98th Street.

**LAMP-PC00028-10**

**Comment:** The TIA and 98th Street Operational Analysis utilizes the Transportation Research Board, Circular 212 Critical Movement Analysis (CMA) Planning Method for intersection analysis. While this methodology is recommended in the LADOT Traffic Study Policies and Procedures (August 2014) for land use development projects it is not suitable for assessing impacts associated with infrastructure projects including transit, rail, bicycle and roadway improvements. We can all agree that LAMP is more than a mere land use development project. LADOT guidelines specifically state that microsimulation may be necessary to fully understand the effects of the project in terms of queue lengths, traffic signal timing parameters, and transit travel times etc. The DEIR does not provide any microsimulation and therefore fails to disclose potential queuing impacts.

**Response:** Please see Response to Comment LAMP-PC00028-6 above, as well as Response to Comment LAMP-AL00012-5 for information documenting why the Draft EIR traffic impact analysis methodologies were appropriate to analyze impacts of the LAX Landside Access Modernization Program Project. The improvements proposed along 98th Street are roadway improvements

only. Queuing analysis is performed when intersection LOS is poor and backups are anticipated which could impact access or other intersections. As stated in Response to Comment LAMP-PC00028-7, the projected LOS at intersections near the Century Parking Spot would be LOS C or better under 2035 With Project conditions.

**LAMP-PC00028-11**

**Comment:** LADOT guidelines also state that intersection capacity at intersections along a congested corridor may need to be adjusted to account for reduced capacity due to gridlock, heavy pedestrian volumes or other factors. Gridlock and heavy pedestrian volumes are expected under Future Conditions With Project, but the DEIR fails to account for these factors.

**Response:** At the outset of the Traffic Study, Raju Associates, the traffic engineering consultant for the proposed Project, worked with LADOT to identify specific intersection locations along congested corridors and reduced the capacity due to closely-spaced intersections, constrained lane assignments, heavy pedestrian conflicts, etc., prior to using the LADOT's analysis software (CalcADB) for traffic impact analyses. Capacity calculation worksheets reflecting these adjustments are provided in Appendix O of the Draft EIR.

**LAMP-PC00028-12**

**Comment:** Our comment and request is that LAWA analyze the intersections of 96th Street at Sepulveda Boulevard, 98th Street at Sepulveda Boulevard, and New "A" Street at 98th Street for mitigation purposes and take into consideration and address the significant safety and service concerns related specifically to the Century Parking Spot location set forth in the preceding paragraphs as a result of increased 98th street traffic and vehicle queing issues.

**Response:** Please see Response to Comment LAMP-PC00028-6 and LAMP-PC00028-9 above. Because significant impacts are not predicted at the locations of concern to the commentor, no mitigation measures for these locations required.

**LAMP-PC00028-13**

**Comment:** MODE SHARE AND TRIP GENERATION

A review of the TIA in Appendix O of the DEIR identifies the various ground transportation mode shares at the CTA, however additional information must be provided to ensure full disclosure pursuant to requirements under CEQA.

Table 17 in the TIA identifies the existing ground transportation mode shares at the CTA as well as the vehicle occupancies assumed in the DEIR technical reports. The source cited for this information is Ricondo & Associates, Inc., however the DEIR does not disclose the count data information to support the mode shares or vehicle occupancies (with vehicle occupancies discussed in more detail in the section herein titled Shuttle Access Issues).

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FIGURE 1
CONCEPTUAL 98TH STREET ROADWAY STRIPING PLAN

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**Response:** A detailed description of the process and data used to develop the existing ground transportation mode shares and vehicle occupancies for originating/terminating passengers is provided in Section 4.12.1.2.3. Description of Existing (2014) Traffic Conditions, and Section 4.12.1.2.4, Vehicle Trip Generation and Distribution Model, of the Draft EIR. CTA traffic volume counts, Automated Vehicle Identification (AVI) counts, in-pavement loop detectors, and intersection turning movement counts collected in August 2014 were used to define the design day traffic conditions. This data, along with mode split information from the LAX 2011 Passenger Survey,[1] were used to define the initial passenger mode splits and vehicle occupancy factor which were refined as part of the Trip Generation and Distribution modelling process.

For additional information related to the development of vehicle occupancies listed in Table 17 of Appendix O, please see Response to Comment LAMP-PC00024-2.

[1] Unison Consulting, Inc., Los Angeles International Airport 2011 Passenger Survey, conducted between August 22 and August 28, 2011 (peak) as well as October 17 and October 24, 2011 (non-peak), August 2012.

**LAMP-PC00028-14**

**Comment:** Generally speaking, the DEIR does not use consistent nomenclature when describing different modes of transportation (e.g., private parking shuttles in Table 17 versus off-airport private parking in Table 18). This makes it very difficult for the public and decision makers to appropriately review the documentation and fully understand what, exactly, is being analyzed so it is recommended that the FEIR use consistent nomenclature throughout the EIR.

**Response:** In response, Appendix O of the Draft EIR, page 193 (Table 17) has been revised to change "private parking shuttles" to "off-airport private parking" for consistency with Table 18. Please see Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-PC00028-15**

**Comment:** Lastly, Table 18 in the TIA identifies future mode shares at the CTA, ITFs, and CONRAC. Specifically, the mode share for Off-Airport Private Parking identifies a significant reduction in the mode share from existing conditions (e.g. Table 17) and no information is provided to substantiate this reduction in mode share other than a source reference to Ricondo & Associates, Inc. however, as previously stated, no information from Ricondo & Associates, lnc. is provided in the DEIR. We would like to understand what assumptions were made in determining the significant reduction in mode share from existing conditions. This fact on its face is obviously concerning for an operator whose livelihood depends in large part on capturing mode share, but also raises the question posited here- what information and assumptions were relied upon in coming up with this calculation?

**Response:** Table 17 in Appendix O of the Draft EIR, provides the mode split information for the Arrivals level and Departures level peak periods from the LAX 2011 Passenger Survey.[1]

The information presented in Table 18 in Appendix O of the Draft EIR includes the 2015 daily mode split derived from the LAX 2015 Passenger Survey,[2] as well as the estimated future daily passenger mode splits at the projected 2035 passenger activity level. The data LAWA has shows a decreasing trend in off-Airport parking (from 2011 to 2015). Based on the historical trends observed, future mode shares for all modes were projected by transportation professionals as an assumption in the Traffic Study.

Section 2.4.6, Transportation Policies at LAX, in Chapter 2, Description of the Proposed Project, of the Draft EIR describes the existing transportation policies at LAX and the policy changes that LAWA may establish at LAX. These could include changes to fees, pricing, licenses, traffic patterns, and agreements with various commercial vehicle operators at LAX, as well as fees and prices for parking at LAX facilities. Additionally, LAWA may implement tolls for commercial vehicle operators and potentially to the public to access Airport facilities if needed to manage traffic during peak periods and for incident management. The Draft EIR states, in Section 2.4.6.1, on page 2-144, that, "[t]o reduce congestion on the CTA roadways, LAWA would update the LAX Ground Transportation Permit Program to allow and/or require commercial operators to pick-up and drop-off passengers at the ITF East and ITF West. Concurrently, LAWA would restrict access to the CTA for some commercial operators. LAWA would also institute pricing differential strategies to encourage commercial vehicle operators to pick-up and drop-off passengers at the ITF East and the ITF West."

Section 2.4.6.2 of the Draft EIR, also on page 2-144, states that, "[w]ith implementation of the proposed Project, changes to the LAX Ground Transportation Permit Program, and implementation of pricing differential strategies, LAWA would manage the Project facilities to induce future daily passenger mode share shifts, with most commercial vehicle operators picking-up and dropping-off passengers at the ITF East and ITF West. LAWA would manage the facilities and Airport traffic to effectuate a shift of up to approximately 49 percent of the Airport passenger pick-up and drop-off from the CTA to the ITF East, ITF West, and CONRAC." Additional language on traffic management at the ITF West (Section 2.4.6.2.1 of the Draft EIR) and ITF East (Section 2.4.6.2.2), describes the actions that LAWA may take to encourage use of these facilities and a shift in traffic from the CTA. However, it should be noted that nowhere does the Draft EIR state that specific commercial vehicles would all be barred from operating within the CTA.

The operational assumptions identified in Tables 4.12.1-8 and 4.12.1-9 on pages 4.12-31 and 4.12-32 (for 2024 conditions) and Tables 4.12.1-10 and 4.12.1-11 on pages 4.12-34 and 4.12-35 (for 2035 conditions) in Section 4.12.1, On-Airport Transportation, of the Draft EIR, were assumptions used in the traffic analyses to analyze traffic conditions with approximately 48 percent of the traffic shifted outside of the CTA. LAWA will be evaluating the appropriate actions and incentives to take to effect this shift in traffic to ensure that the investment they are making in improving the landside access system at LAX is successful. LAWA recognizes that there are a number of ways that a shift in approximately 48 percent of vehicle traffic can be achieved; LAWA will continue to coordinate with the affected parties and will need to seek approval from the Board of Airport Commissioners to implement any changes to the existing transportation policies at LAX. From a traffic perspective, an alternative to evaluate different assumptions about where different commercial modes operate would not be meaningfully different from the traffic analyses presented in Section 4.12.1, On-Airport Transportation, and Section 4.12.2, Off-Airport Transportation, of the Draft EIR.

Two key factors should be considered when comparing the passenger mode shares presented in Table 17 and Table 18 in Appendix O. First, as noted in Section V – Future Conditions – With Project and Traffic Impacts (page 168) and Table 17 in Appendix O, the information provided in Table 17 represents the passenger mode splits for the 2014 arrivals and departures peak periods. Comparatively, Table 18 on page 169 of Appendix O provides the future daily passenger mode splits. Because factors such as regional traffic, availability of commercial service, etc. during different times of the day impact passenger's mode choice, it is not appropriate to directly compare peak period and daily passenger mode splits. For future (2024) arrivals and departures peak period passenger mode split information, refer to Table 4.12.1-8 and Table 4.12.1-9 in Section 4.12.1.8.2 of the Draft EIR. Similarly, for future (2035) arrivals and departures peak period passenger mode split information, refer to Table 4.12.1-10 and Table 4.12.1-11 in Section 4.12.1.9 of the Draft EIR. The second key factor to consider when

comparing the 2014 peak period passenger mode splits to future conditions is the impact Transportation Network Companies (TNC) or Paid Ride services are expected to continue having on passenger mode choice in the future. Paid Ride (TNC) services were not permitted to operate at LAX in 2014 and not included in the air passenger surveys until 2015; therefore any Paid Ride (TNC) activity prior to 2015 is imbedded within the various modes provided in Table 17. Table 18 however, includes the Paid Ride (TNC) mode and based on data used to develop the 2015, the future 2024 and 2035 mode shares, Paid Ride (TNC) passengers have shifted from various other modes including private vehicle (pick-up, drop-off) on and off-Airport parking, taxicabs, shared ride vans, rental cars, etc.

The extent of passengers who will continue to switch from other modes to Paid Ride (TNC) in the future was estimated based on data from the 2015 Air Passenger Survey noted above, historic trends in mode share at LAX, changes to mode share trends at other U.S. airports and industry literature available at the time of the analyses, as well as professional judgment by transportation professionals.

[1] Unison Consulting, Inc., Los Angeles International Airport 2011 Passenger Survey, conducted between August 22 and August 28, 2011 (peak) as well as October 17 and October 24, 2011 (non-peak), August 2012.

[2] Unison Consulting, Inc., Final Report, Los Angeles International Airport 2015 Air Passenger Survey Results and Findings, February 2016.

**LAMP-PC00028-16**

**Comment:** Further confounding us on this issue, Table 6 in the TIA identifies the existing trip generation for Off-Airport Parking during the AM, Mid-Day, and PM Peak Hours. The trip generation for future conditions is not consistent with the decrease in mode share shown in Tables 17 and 18. Again, as stated above, no information is provided to substantiate the trip generation other than a source reference to Ricondo & Associates, Inc. however, as previously stated, no information from Ricondo & Associates, Inc. is provided in the DEIR.

**Response:** There is no inconsistency in the Draft EIR between trip generation and mode share. Table 6 in Appendix O of the Draft EIR provides a summary of the total number of entering and exiting vehicle trips generated by the Airport during the A.M., Mid-day and P.M. commuter peak periods. These trips consider both Airport (LAWA)-owned facilities, such as the Central Terminal Area (CTA), public parking (Lot C), cargo facilities, as well as privately-owned facilities such as off-Airport parking garages and rental car company sites. Neither daily nor arrivals or departures peak period passenger mode splits can be directly compared to commuter peak hour vehicle trips. First, the peak arrivals and departures periods occur at different times compared to the commuter peak hours, and second, passenger mode share represents the percentage of passengers using a specific transportation mode, it is not equivalent to the percentage of vehicles or trips entering/exiting the airport. Passenger mode share (or mode splits) is defined in Section 4.12.2.2.5, Methodology and Modeled Scenarios, of the Draft EIR.

Section 4.12.1.2.4, Vehicle Trip Generation and Distribution Model, of the Draft EIR provides a detailed discussion of the vehicle trip generation process including data sources.

**LAMP-PC00028-17**

**Comment:** Our comment and request is that LAWA provide more detail with regard to the underlying data, information and assumptions that were used by LAWA and Ricondo & Associates, Inc. in

determining the figures set forth in the DEIR and specifically Tables 6, 17 and 18 with regard to existing and future mode share and trip generation.

**Response:** With respect to the request for additional supporting data, information and assumptions used in the development of trip generation and mode share information, please see Responses to Comments LAMP-PC00028-13, LAMP-PC00028-14, LAMP-PC00028-15 and LAMP-PC00028-16 above.

**LAMP-PC00028-18**

**Comment:** We welcome the opportunity to continue working with LAWA on LAMP and the many other projects that are in store in the years to come. We applaud the efforts of Executive Director Flint and her staff to take these critically necessary steps forward in making sure that LAX operates as a world class airport benefiting the hundreds of thousands of national and international travelers coming through its doors every day, not to mention the scores of local Los Angeles citizens which The Parking Spot is proud to be able to serve during the trip through LAX.

**Response:** The comment is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the LAX Landside Access Modernization Program.

## LAMP-PC00029 Given, John P. Law Office of John P. Given (Paul Soloman) 11/15/2016

**LAMP-PC00029-1**

**Comment:** The following comments are in response to the Draft Environmental Impacted Report (DEIR) for LAX's Landside Access Modernization Program (LAMP) on behalf of Paul Solomon and 6171 Century, LLC, owner of the building located at 6171 W. Century Boulevard, located within the project area at the northeast corner of W. Century Boulevard and Vicksburg Avenue. 6171 W. Century is home to an 83,000 square foot office building, with tenants employing approximately 300 workers on-site. 6171 Century is a member of the Gateway Los Angeles Business Investment District, and this comment letter adopts by reference any DEIR comment letters submitted by the Gateway LA BID or other Gateway LA BID members to the extent they are not inconsistent with these comments.

As a preliminary matter, please ensure that all projected-related notices are timely provided to this office.

**Response:** Please see Responses to Comments LAMP-PC00029-2 through LAMP-PC00029-12 below. The comment letters prepared by the Gateway LA Business Improvement District (BID) that are referred to in this comment have been assigned comment letter numbers LAMP-PC00014 and LAMP-PC00030; please see responses to comment letters LAMP-PC00014 and LAMP-PC00030. Additional letters from members of the Gateway LA BID were also received, including:

- LA Community College District, LAMP-AL00004
- LA Community College District, LAMP-AL00005
- TPS Parking Management, LLC (The Parking Spot), LAMP-PC00020
- TPS Parking Management, LLC (The Parking Spot), LAMP-PC00028
- Four Points by Sheraton, Los Angeles International Airport, LAMP-PC00024

- Los Angeles Airport Marriott, LAMP-PC00025
- Hyatt Regency Los Angeles International Airport, LAMP-PC00026
- Crowne Plaza Los Angeles Int'l Airport, LAMP-PC00053
- L&R Group of Companies, LAMP-PC00054

The Law Office of John P. Given has been added to the Project mailing list so that all notices concerning the environmental documents associated with the proposed LAX Landside Access Modernization Program will be provided directly to that office, as commentor requests.

**LAMP-PC00029-2**

**Comment:** I. Traffic and Circulation

Traffic and circulation issues are the predominant concern, due to 6171 Century's location only one block east of Sepulveda in the heart of the project area between the Central Terminal Area (CTA) and the Intermodal Transportation Facilities (ITFs). It is critical that planned improvements to roadway and other transportation infrastructure in the general and immediate vicinity of 6171 Century do not hamper safe and uninterrupted access to 6171 Century and other nearby businesses by pedestrians, bicyclists, and drivers.

**Response:** Please see Responses to Comments LAMP-PC00029-3 through LAMP-PC00029-10 below.

**LAMP-PC00029-3**

**Comment:** Pedestrian Access

The DEIR should more completely investigate, describe, and analyze pedestrian access to the CTA. In particular, the project must provide for continued safe pedestrian access between 6171 Century and the CTA. 6171 Century tenants appreciate that existing conditions in the project area allow for relatively easy pedestrian access to the CTA's northern terminals. Terminal 1 is located less than 2,000 feet away. (Once constructed, Terminal 0 will be less than half that distance.) A series of sidewalks and crosswalks along existing street segments provide largely safe pedestrian access.

Challenges do exist, however. The crossing of Sepulveda Blvd is dangerous, and access to the CTA's southern terminals is circuitous and mysterious. Lack of adequate wayfaring signage is a significant problem. Given the project's massive planning and investment, much-needed improvements for pedestrian access to the entire CTA, including improved safety and signage, should not be an afterthought. With the planned Phase 2 removal of the W. Century Boulevard street segment west of S. Sepulveda Blvd. (DEIR 4.12-24), it is critical that accommodations for continued pedestrian access be planned for once the W. Century west of S. Sepulveda street segment is removed.

While pedestrian access to the West ITF has been accounted for in the DEIR, no similar planning appears to have been done to maintain pedestrian access between 6171 Century and other nearby offices, hotels, and other businesses and the CTA. DEIR Appx. O, p.90. The DEIR reports that "Pedestrian access from Century Boulevard to World Way North would be maintained," but no additional details are provided. Id. at 95. Pedestrian access between 6171 Century and the West ITF is an available, but inadequate, substitute for pedestrian access to the CTA, because many pedestrian trips would be extended in both time and distance.

This is not merely an issue of pedestrian convenience. When the CTA was largely evacuated recently due to fear of an active shooter, many travelers streamed out of the CTA to Century Boulevard. Consideration of this pedestrian route for emergency evacuation must be considered as part of the project.

Planned pedestrian access between 6171 Century and the West ITF appears to be adequate, but the DEIR should provide additional information to explain planned pedestrian improvements that will accompany Phase I and Phase II street segment changes. Planned pedestrian improvements in the vicinity of the West ITF (including street furniture, lighting fixtures, signposts, newspaper stands, trash receptacles, and other elements, see DEIR Appx. O, p. 90) should extend to the businesses along Century Boulevard to encourage and facilitate greater pedestrian use.

**Response:** Page 2-139 in Chapter 2, Description of the Proposed Project, of the Draft EIR discusses the pedestrian crossing at Sepulveda and Century Boulevards. Specifically it states the following; "Implementation of the proposed Project would change traffic patterns at the intersection of W. Century Boulevard and Sepulveda Boulevard, which may affect the existing pedestrian route into the CTA to accommodate the changes in the access road system. Currently, pedestrians can cross Sepulveda Boulevard to walk into the CTA or walk down W. Century Boulevard to the office buildings and hotels located east of the CTA. LAWA would preserve a pedestrian connection between the CTA and W. Century Boulevard as part of the proposed Project, through either an at-grade crossing or future pedestrian bridge." Thus, LAWA is committed to preserving pedestrian access into the CTA.

As discussed on pages 4.12-153 and 4.12-167 of the Draft EIR, impacts to bicycle and pedestrian facilities would be less than significant. As discussed on page 4.12-153, the proposed Project consists of roadway and transportation improvements and construction of facilities that would facilitate movement of passengers at LAX; the proposed Project would not generate any additional new trips. The proposed Project would provide additional pedestrian facilities, bike paths and bike facilities for utilization by visitors and employees. As indicated in Section 2.2 of the Draft EIR, one of the inherent objectives of the proposed Project is to provide and enhance new access options for all modes of travel. It is not the purpose of an EIR to fix or mitigate existing environmental issues, as suggested in the comment. (CEQA Guidelines Section 15126.2(a); *Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1094 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"].Because different phases of the proposed Project would affect access at Sepulveda and Century Boulevards, pedestrian access across Sepulveda Boulevard may also change. However, LAWA is aware of the interest and desire to maintain a pedestrian crossing and is developing plans to ensure that pedestrian access is maintained at all times.

Similarly, the pedestrian access that exists today to the 6171 W. Century Boulevard along W. Century and Little Century Boulevard would not change. Pedestrian access would be maintained to allow movement of pedestrians along W. Century Boulevard and to the CTA. Please note that LAWA does not own the property along the north side of W. Century Boulevard and therefore, would not be improving streetscape and sidewalks along property it does not own. The Department of City Planning is finalizing a streetscape plan for W. Century Boulevard (the Century Corridor Streetscape Plan), which would apply to all property owners along W. Century Boulevard between Sepulveda and La Cienega Boulevards. (See http://www.lawa.org/ourLAX/CurrentProjects.aspx?id=8767.) Once adopted by City Planning, any property owner doing major improvements to their property that fronts W. Century Boulevard in these locations, would be required to implement the plan, which includes standards for sidewalks and landscaping. The proposed LAX Landside Access Modernization Program includes streetscape improvements for those portions of W. Century Boulevard that front LAWA property. The roadway improvements to the eastbound lanes of W. Century Boulevard would be

completed as part of Phase 1 of the Project; thus, streetscape plans for the eastbound lanes of Century Boulevard between Sepulveda and Aviation Boulevards would be implemented at that time by LAWA. Streetscape improvements for other portions of W. Century Boulevard would be done by individual property owners when improvements are made to their property.

The Design Guidelines contained in Appendix B of the Draft EIR specify sidewalk and landscape improvements that LAWA would incorporate as part of the LAX Landside Access Modernization Program. When roadway improvements are constructed, the sidewalk, landscape, and bike paths (as applicable) would be implemented. The majority of roadway improvements would be implemented in Phase 1 (see Section 2.6.1 in Chapter 2, Description of the Proposed Project, of the Draft EIR); roadway improvements in Phase 2 are limited to the reconfiguration of the Sepulveda Boulevard/Century Boulevard access system to the Airport.

Finally, Mitigation Measure MM-ST (LAMP)-1, Construction Traffic Project Task Force, discussed in Section 4.12.3.8 of the Draft EIR, and as revised in Chapter 3, Corrections and Additions to the Draft EIR, requires LAWA to establish a Project Task Force to review traffic management plans to, among other things, ensure that pedestrian, business, bicycle, and traffic flow is considered during all phases of construction and that emergency access routes are maintained.

**LAMP-PC00029-4**

**Comment:** Bicycle Access

Continued and enhanced safe bicycle access between 6171 Century and the West ITF should also be further studied and provided as part of the project. A number of current 6171 Century tenants use bicycles as a primary transportation mode, and recent tenant improvements at 6171 Century have included bicycle lockers and shower facilities to encourage this use. With the implementation of new Metro and APM facilities the number of cyclists is likely to grow. Moreover, numerous nearby hotels, offices, and other businesses would likely increase facilities for their workers, tenants, and guests when planned LAMP facilities are constructed, particularly if bicycling infrastructure is intelligently expanded beyond what is presently planned.

The DEIR contemplates amending Mobility Plan 2035 in the project area to maintain consistency between the project and Mobility Plan 2035. DEIR 4.8-44. The DEIR finds that there will be no significant impacts to bicycle facilities. DEIR 4.12-153. While maintaining consistency with current planning goals and ensuring no significant impacts to bicycle facilities are admirable goals, the project could go a lot further toward expanding bicycle use within and without the project area, by planning for and providing bicycle facilities in addition to those already planned. The DEIR should provide a greater level of detail with respect to bicycle infrastructure, which would promote substantially greater input from the cycling community and other stakeholders to ensure that project plans are sufficient for their intended purpose and can continue to expand to adequately support a growing cycling community.

**Response:** One of the proposed Project objectives is to enhance the passenger experience by providing new access options for all modes of travel, including bicycles (Draft EIR, p. 2-7.) The LAX Landside Access Modernization Program proposes to modify the Bike Plan as included in the existing Mobility Plan 2035 (see Figure 2-55 of the Draft EIR). In addition, the proposed ITFs would be designed to incorporate bicycle and pedestrian facilities, including bicycle parking and changing/shower facilities (see page 2-147 of the Draft EIR). The Design Guidelines contained in Appendix B of the Draft EIR specify sidewalk, bike, and landscape improvements that LAWA would incorporate as part of the LAX Landside Access Modernization Program. When roadway improvements are constructed, the sidewalk, landscape, and bike paths/facilities (as applicable) would be implemented.

**LAMP-PC00029-5**

**Comment:** Existing and planned bicycle facilities are presented in Appendix O, Off-Airport Traffic. Figure 8, Existing and Planned Bicycle Facilities, DEIR Appx. O, p. 69. The proposed bicycle facilities described in that graphic appear to be somewhat inconsistent with those described in the DEIR elsewhere. See DEIR, Figure 2-55, p. 2-203. A clarification of the conflict between proposed facilities is necessary.

**Response:** The LAX Landside Access Modernization Program proposes to modify the Bike Plan as included in the existing Mobility Plan 2035 (see Figure 2-55 of the Draft EIR). In addition, the proposed ITFs would be designed to incorporate bicycle and pedestrian facilities, including bicycle parking and changing/shower facilities (see page 2-147 of the Draft EIR). The proposed Bicycle Plan as shown on Figure 2-55 is correct; the Figure 8 on page 69 in Appendix O of the Draft EIR is incorrect. A corrected Figure 8 is included in Chapter 3, Corrections and Additions to the Draft EIR; this correction does not result in any new or substantially more severe significant environmental impacts.

**LAMP-PC00029-6**

**Comment:** Finally, to the extent that bicycle facilities are not planned to extend further west on Century Boulevard than Airport Boulevard, 6171 Century suggests that the proposed Multi-Use Path be extended along the north side of W. Century Boulevard from Airport Boulevard to S. Sepulveda Boulevard. Alternately, a similar bicycle facility could be made part of 98th Street west of Airport Boulevard as shown in the above-cited Figure 8. DEIR Appx. O, p. 69.

**Response:** The LAX Landside Access Modernization Program proposes to modify the Bike Plan as included in the existing Mobility Plan 2035 (see Figure 2-55 of the Draft EIR). Under the proposed Project, bicycle access would be maintained from connections along Westchester Parkway/W. Arbor Vitae Street, Airport Boulevard, Century Boulevard and Aviation Boulevard. The commentor suggests an extension of the multi-use path along Century Boulevard to the west of Airport Boulevard; however, the property on the north side of W. Century Boulevard is not owned by LAWA and there would be no place for a bike path to connect to on the south side of Century Boulevard. As noted in the Response to Comment LAMP-PC00029-5, the proposed ITFs would be designed to incorporate bicycle and pedestrian facilities, including bicycle parking and changing/shower facilities (see page 2-147 of the Draft EIR).

**LAMP-PC00029-7**

**Comment:** Vehicular Access and Parking

It is critical that vehicle access to 6171 Century, its dedicated parking facilities, and other on- and off-street parking be maintained during all phases of construction and operation of the LAMP project. 6171 Century has a 12-space lot on site, 200 dedicated parking spaces in the Joe's Parking structure located at 6141 Century Boulevard, and tenants and guests of 6171 Century also use the Quik Park facility on Vicksburg Avenue between Century and 98th Street as well as parking meters located on Vicksburg Avenue between Century and 98th Street, and on 98th Street east of Vicksburg Avenue.

The DEIR notes that"[c]onstruction of the proposed Project could result in the closure of one or more lanes of a major off-Airport traffic carrying street for an extended length of time" and that "crosswalks, bike paths and pedestrian pathways may be restricted or close for a period of time." DEIR 4.12-238. The DEIR notes only that alternate routes would be provided. For such a massive undertaking, the DEIR provides very little detail as to the timing of expected impacts. For

example, a Gantt chart provided in the DEIR shows that roadway projects during Phase I will begin in the second quarter of 2018 and continue until the fourth quarter of 2023, but these are not broken down in a meaningful way. Table 2-15, Construction Phasing, DEIR 2-179. Phase II roadway improvements will not begin until after the APM is operational, but no specifics with respect to expected timing are provided. DEIR 2-182. It would be most helpful to local businesses if a greater degree of precision could be provided for the timing of both Phase I and Phase II roadway impacts and expected detours and approximate durations of short and long-term closures.

**Response:** Multi-modal access and circulation would be maintained adjacent to the subject property during construction and would be considered during development of Worksite Traffic Control Plans under Mitigation Measure MM-ST (LAMP)-3. Vehicular access to 6171 W. Century Boulevard and its dedicated parking facilities would be maintained throughout construction. Most of the roadway construction associated with the LAX Landside Access Modernization Project in Phase 1 would occur east and south of the 6171 W. Century Boulevard building and is not anticipated to require closure of roads immediately adjacent to the building. If roadway closures are required, alternative routes would be provided so that access to the 6171 W. Century Boulevard building, as well as adjacent businesses and properties would be provided at all times. Please see Response to Comment LAMP-AL00002-18 which describes the Project Task Force that would be established as part of Mitigation Measure MM-ST (LAMP)-1 to develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction of the proposed Project.

The specific timing of roadway improvements would greatly depend on the individual developers of the various Project components. Until LAWA has awarded design and construction contracts and determined which roadway improvements would be included with specific contracts, it is impossible to specify exact timing of improvements. The Draft EIR assumed that roadway improvements would occur between 2018 and 2023, and made assumptions on when those improvements would occur during that timeframe. However, a detailed Construction Management Plan and schedule for those improvements has not yet been developed. The specific details associated with construction traffic phasing and management plans, including associated mitigation measures, would all be coordinated with stakeholders at the time of final design of the various facilities and roadways. See Draft EIR Mitigation Measures MM-ST (LAMP)-1, Construction Traffic Task Force, and MM-ST (LAMP)-3, Worksite Traffic Control Plans.

**LAMP-PC00029-8**

**Comment:** Mitigation measure MM-ST (LAMP)-1 creates a Construction Traffic Project Task Force to coordinate among LAWA and other public infrastructure projects and provide notification and an opportunity for public input and support, among other things. DEIR 4.6-36 to 37. This will be a vitally important mitigation for local businesses, but does not excuse the project from providing as much advance information about specific locations and timing of roadway impacts as possible, and amending that information with increasing levels of precision as actual construction commences.

**Response:** Mitigation Measure MM-ST (LAMP)-1, Construction Traffic Project Task Force, described on pages 4.12-238 through 4.12-240 in Section 4.12.3, Construction Surface Transportation, of the Draft EIR, discusses the construction coordination efforts that LAWA would undertake as part of the proposed Project. Given the size and scope of the LAX Landside Access Modernization Program, it is not feasible to identify the specific time and location of roadway impacts until a design team is under contract to conduct the construction phasing. Because the roadways being affected are also vital access roads to the Airport, LAWA by necessity would minimize lane

closures and roadway closures during peak Airport travel periods, which also correspond to peak commuter periods.

As stated in Section 4.12.3.7.4, Temporary Traffic, Access, and Transit Impacts during Construction, of the Draft EIR, to minimize impacts to the CTA roadway system and Airport operations during construction, the Project components located within the CTA would be constructed over an 18-hour/day schedule with two shifts. The "night" shift would occur from approximately 1 a.m. to 9 a.m. and the "day" shift would occur from approximately 9 a.m. to 7 p.m., with minimal construction occurring between 7 p.m. and 1 a.m. Approximately 65 percent of construction activity within the CTA would occur during the 8-hour night shift, when traffic levels are low, and 35 percent would occur during the 10-hour day shift. Delivery of construction materials would occur during the night shift, as would most lane closures. Construction activities during the day shift would largely consist of activities that could proceed without requiring lane closures or significantly disrupting Airport operations.

As stated in Section 4.12.3.7.4 of the Draft EIR, project-related construction outside the CTA would require temporary lane closures and detours, particularly when roadway improvements to Century Boulevard, Airport Boulevard, Aviation Boulevard, Arbor Vitae Street, and W. 98th Street are constructed and when the APM guideway is constructed over existing streets. Construction-related impacts to the off-Airport surface transportation system could result in substantial congestion and inconvenience to motorists and pedestrians on a regular or frequent basis. Construction activity outside of the CTA would occur during two 8-hour shifts/work day (16 hours/day): a morning shift from approximately 7 a.m. to 3 p.m., and an evening shift from approximately 3 p.m. to 11 p.m. For construction of the APM guideway outside of the CTA, approximately 60 percent of construction would occur during the morning shift and 40 percent during the evening shift. For construction of all other elements (excluding the APM guideway), approximately 80 percent would occur during the morning shift and 20 percent during the evening shift. To the extent feasible, most lane closures would occur during off-peak and evening hours. Construction activities during the day shift would largely consist of activities that could proceed without requiring lane closures or significantly disrupting area traffic.

**LAMP-PC00029-9**

**Comment:** With respect to mitigation measure MM-ST (LAMP)-4, which restricts "designated major or secondary highways" from being closed to vehicular or pedestrian traffic except at night or on weekends, because the street configuration in the vicinity of LAX is complex, 6171 Century requests more information as to specifically which streets and street segments are so designated, in order to know how the mitigation might protect its vehicle, parking, and other access. Depending on which streets this mitigation is intended to protect, additional mitigation measures may be necessary.

**Response:** Designated major or secondary highways in the vicinity of the Airport include Sepulveda Boulevard, Century Boulevard, Aviation Boulevard, Imperial Highway, I-105, and I-405. As stated in Mitigation Measure MM-ST (LAMP)-4 in Section 4.12.3.8 of the Draft EIR, no designated major or secondary highway would be closed "unless approval is granted by the jurisdiction in which it is located". Furthermore, as stated in Mitigation Measure MM-ST (LAMP)-1, a Project Task Force would be established to review plans for lane closures and detours, in addition to working with residential and commercial neighbors regarding upcoming construction activities. The Task Force would be comprised of key stakeholders from LAWA, the Coordination and Logistic Management Team (CALM), other City departments, and others as deemed appropriate. Furthermore, as stated in Section 4.12.3.8, Mitigation Measure MM-ST (LAMP)-5 states "[u]nless otherwise specified in the WTCP [Worksite Traffic Control Plan], the contractor shall maintain access to the businesses that rely on on-street parking and pedestrian access during

construction. If it is necessary to temporarily restrict access to a business, the contractor shall provide the facility advance notice of restrictions. Unless otherwise specified in the WTCP, the contractor shall schedule access restrictions to off-peak hours or during times when the business is closed and shall not fully restrict access for the total hours of operation of business on any given day of operation." As such, 6171 Century Boulevard would be notified prior to the closure of any roadway which would affect the property.

**LAMP-PC00029-10**

**Comment:** The DEIR notes that approximately 200 metered parking spaces will be removed, including approximately twelve in reasonably close proximity to 6171 Century along 98th Street to the east of Vicksburg Avenue. Table 2-14, Impacted Street Parking, DEIR p. 2-174. The DEIR also provides analysis of several operational options regarding 98th Street. DEIR Appx. O, pp. 190-192. The analysis of 98th Street operational options does not mention parking meters, suggesting that whether or not one of the operational options is selected, the parking meters will be removed as described in the main DEIR document. It would be helpful for the FEIR to clarify whether this is actually the case. Business owners generally prefer to retain as much short- and long-term street parking in the vicinity of their businesses as possible.

**Response:** Table 2-14 on page 2-174 in Chapter 2, Description of the Proposed Project, of the Draft EIR identifies that there are 25 short-term parking meters on the south side (eastbound) of W. 98th Street between Vicksburg Avenue and Airport Boulevard. Of these 25-short-term parking meters, 8 would be removed as part of the proposed Project, as shown in the far right column of Table 2-14. Additionally, there are 8 short-term parking meters located on the south side (eastbound) of W. 98th Street between Airport Boulevard and Bellanca Avenue; as indicated in Table 2-14, 4 of these meters would be removed under the proposed Project. Finally, Table 2-14 identifies that there are currently 63 short-term parking meters located on the north side (westbound) of W. 98th Street between Vicksburg Avenue and Bellanca Avenue. Of these 63 meters, 16 would be removed by the proposed Project.

Three 98th Street operating options are discussed in Section 4.12.2.7.5 in Section 4.12.2, Off-Airport Transportation, of the Draft EIR. Pages 4.12-177 and 4.12-178 of the Draft EIR state that the existing 8 metered parking spaces on the south side of W. 98th Street near Bellanca Avenue would be removed as part of Options 1, 2, or 3. Thus, the proposed Project would result in the removal of 32 of the existing 96 short-term parking meters located on W. 98th Street between Vicksburg Avenue and Bellanca Avenue.

Please note that parking impacts are generally not physical environmental impacts that must be considered in CEQA documents. (See *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco*, (2002) 102 Cal.App.4th 656). Additionally, the proposed Project would increase the number of parking spaces above baseline conditions. (Draft EIR Sections 2.4.2.1.2, and 2.4.3.1; and page 4.12-153.)

**LAMP-PC00029-11**

**Comment:** II. Other Project Concerns

Potential Cellular Telephone Infrastructure Conflicts

6171 W. Century Blvd. is a three-story office building with multiple cellular telephone antennas located on the roof. These provide cellular telephone signals radiating out in multiple directions, including to the south and east, toward the proposed elevated APM. The cellular telephone antennas are located at heights of approximately 45-60 feet. The APM guideway is described as

varying in height from approximately 70 feet above grade within the CTA to a height of approximately 50 feet above grade near the ITF East and car rental facility. DEIR p. 2- 32. Note, however, that the DEIR seems inconsistent on this point, stating that the top of rail height of the APM structure in the vicinity of the ITF West facility is only 40 feet. DEIR Appx. M, p. M-40. The precise height of the APM Guideway in the vicinity of 6171 W. Century is thus not entirely clear.

Whatever the height of the APM, the DEIR should analyze whether the location of the APM structure or trains might interfere with the existing cellular telephone antenna infrastructure at 6171 W. Century, and if so, how significant the interference could be, and what mitigations would minimize such an impact, if any.

**Response:** The APM alignment would not be directly adjacent to the building located at 6171 W. Century Boulevard (located at the corner of W. Century Boulevard and Vicksburg Avenue), but rather would be located approximately 270 feet south and approximately 330 feet to the east. The building would be separated from the APM guideway by 10 lanes of traffic on Century Boulevard and the 12-story building (located at 6151 W. Century Boulevard) directly to the east. In this area, the height of the APM guideway would be approximately 65 feet.

APMs are designed to operate in built environments where electro-magnetic interference (EMI) from cellular telephone antennae and other emitters is common. The technical requirements being developed for solicitation will include provisions that the APM Operating System will not create EMI that will adversely affect other non-APM system equipment, and also that the APM Operating System shall not be affected by other equipment in the surrounding environment. The APM system at Phoenix-Sky Harbor International Airport has cellular telephone antennae located within approximately 12-15 feet from the path of APM Operating System with no interference of cellular telephone signals. Given the distance between the 6171 W. Century Boulevard building and the APM guideway, the APM guideway would not interfere with the cellular telephone antenna infrastructure located on the building.

**LAMP-PC00029-12**

**Comment:** Noise and Vibrations

Based on the location of the 6171 Century building amidst major Phase II roadway activities in and around W. Century Boulevard, it appears that the 6171 Century tenants could experience significant noise impacts during one or both construction phases if traffic noise exceeds a property line measurement of an increase of 3 db(A) or more in Community Noise Equivalent Level (CNEL). Given that Phase I construction activities in the vicinity of 6171 Century and other local businesses will commence in 2018, and Phase II activities are intended to commence in approximately 2023 and not be completed until approximately 2035, it is critical that any potentially significant noise impacts that might affect local businesses at the center of construction and operational activities be fully identified and mitigated, since the building will experience 18 years or more of construction activity. An additional noise mitigation should be introduced requiring periodic noise monitoring in high construction activity locations and high construction traffic locations for both Phases I and II to determine whether additional noise mitigations might be necessary.

**Response:** Section 4.9, Noise, specifically subsection 4.9.3.2, discusses the methodologies used to estimate both traffic related and stationary (construction equipment) noise during construction. Table 4.9.3-1 of the Draft EIR identifies the location of noise-sensitive receptors in the Project area; monitoring location (RP1) at 6225 W. Century Boulevard (the Concourse Hotel) is just west of 6171 W. Century Boulevard. The ambient noise for this location was monitored at 76.3 dB(A) during a 2-hour monitoring period (see Table 4.9.3-3).

The 6171 W. Century building would not experience 18 years or more of construction activity from the proposed Project. While Phase 1 would last from 2018 to 2023, the only construction occurring in the vicinity of the 6171 W. Century building during this phase would be the APM guideway and improvements to the south side of W. Century Boulevard. These improvements would occur during only a portion (1-2 years) of that timeframe. Similarly, although Phase 2 construction would occur between 2025 and 2035, the actual construction duration of the Phase 2 roadways would be approximately 3 years within that 10-year timeframe.

As discussed on page 4.9-32 of the Draft EIR, the noisiest phases of construction are typically generated during excavation and grading. Noise levels from equipment with mufflers are typically 86 dB(A) Leq at 50 feet from the noise source. The grading and excavation phases would be temporary, and the use of heavy equipment would be intermittent. As discussed on page 4.9-42 and shown in Tables 4.9.3-5 through 4.9.3-7 of the Draft EIR, it is anticipated that most construction activities would occur during daytime hours. In addition, it is likely that there could be some limited periods when construction activities are scheduled to occur both during the daytime and nighttime hours, as second and third shifts would be used for work activities that cannot be accomplished during the daytime shift.

As the location identified by the commentor (6171 W. Century Boulevard) would be adjacent to the construction for the APM Guideway, ramps, and some street improvements, the projected noise increases as shown on Tables 4.9.3-6 and 4.9.3-7 of the Draft EIR would be most applicable to reflect anticipated construction noise impacts at that location.

Construction traffic noise and construction equipment noise impacts associated with the proposed Project are addressed in Section 4.9.3.5 of the Draft EIR. As discussed on page 4.9-53 of the Draft EIR, the proposed Project component closest to 6171 W. Century Boulevard are the new ramps from southbound Sepulveda Boulevard to World Way, approximately 750 feet to the west from the closest point of construction-related activities for the new ramps. Based on existing ambient noise level of 76.3 dB(A) CNEL in the area of the Concourse Hotel (refer to Table 4.9.3-3), the distance at which construction equipment noise would result in a 5 dB(A) increase over the existing ambient noise level would be approximately 100 feet. Noise-sensitive uses in areas with existing ambient noise of 76.3 dB(A) CNEL would be significantly impacted if construction activity occurred within a distance of approximately 100 feet or less. These distances do not account for any intervening topography, buildings, or other obstructions that would further reduce noise. Given the distance to the 6171 W. Century Boulevard is more than 100 feet, construction equipment noise impacts on this noise-sensitive receptor from construction activities for the new ramps would not be significant because construction activities would not exceed the ambient exterior noise level by 5 dB(A) at a noise-sensitive use.

For construction related traffic, as discussed in Section 4.9.3.5 of the Draft EIR, the daily transportation of construction workers and the hauling of materials would cause increases in noise levels along study area roadways, including Century Boulevard. Construction-related trucks would be restricted to designated routes ensuring these vehicles utilize the nearby freeways and major arterials around the Airport, avoiding minor arterials and local streets (see Figure 2-50 in Chapter 2, Description of the Proposed Project). A doubling of sound energy results in a 3 dB(A) increase, which means that a doubling of sound wave energy (e.g., doubling the volume of traffic on a roadway) would result in a barely perceptible change in sound level. Given these haul routes would use freeways and major arterials, such as Century Boulevard, that already are high-volume routes, construction traffic would not double or triple the existing traffic volumes along these routes. As such, impacts related to construction traffic noise would be less than significant because noise increases would be less than 3 dB(A) Leq(h).

Section 4.9.3.6 of the Draft EIR evaluated noise from the proposed Project as well as future projects and determined that cumulative construction equipment noise impacts would be significant. Additionally, Section 4.9.5 of the Draft EIR addressed combined cumulative impacts associated with combined road traffic, construction, and transit noise. As shown in Table 4.9.5-1 combined road traffic, construction, and transit noise would result in a noise increase at RP1 (6225 W. Century Boulevard), located west 6171 W. Century Boulevard, of 10.7 dB(A) and noise increases at RP2 (6107 W. 98th Street) and RP3 (6101 W. Century Boulevard), both located east of 6171 W. Century Boulevard, of 9.8 dB(A) and 5.7 dB(A), respectively. As described in Section 4.9.5 of the Draft EIR, the largest contributor to combined cumulative noise impacts is construction equipment noise. As discussed in Section 4.9.3 of the Draft EIR, construction equipment noise impacts would, in general, be significant; however Standard Control Measure (Mitigation Measure) LAX-N-1 and Mitigation Measure MM-N (LAMP)-1 would reduce these impacts to levels less than significant. Table 4.9.5-1 indicates that combined implementation of the proposed Project components would have a cumulatively considerable contribution to significant cumulative noise impacts at four locations, including at RP1, RP2, and RP3, identified above as being in the vicinity of 6171 W. Century Boulevard. As discussed in Draft EIR Section 4.8.5, given the relative importance of construction equipment noise to combined noise impacts, however, implementing the construction equipment noise mitigation measures would likely reduce the proposed Project's contribution to less than cumulatively considerable levels.

Based on the above analyses, no additional construction noise mitigation measures are necessary.

**LAMP-PC00029-13**

**Comment:** III. Conclusion

Thank you for the opportunity to provide these comments on the LAX LAMP project DEIR.

**Response:** The comment is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the LAX Landside Access Modernization Program.

## LAMP-PC00030 Hughes, Laurie Gateway to L.A. PBID 11/15/2016

**LAMP-PC00030-1**

**Comment:** On behalf of **Gateway to LA, a Property-based Business Improvement District ("Gateway")** serving area property owners and stakeholders since 1998, we are submitting the following comment letter to Los Angeles World Airports ("LAWA") regarding the above-referenced Draft Environmental Impact Report ("DEIR") for the Landside Access Modernization Program ("LAMP").

1. The DEIR indicates in the Appendix O Report that **shuttle access** to the Central Terminal Area ("CTA") will be restricted (eliminated) for some classes of commercial operators, to encourage pick-up and drop-off at the ITF West, and to reduce congestion in the CTA. Appendix O Report reads: *"LAWA would restrict access to the CTA for some classes of commercial operators such as shared ride vans, scheduled service buses, courtesy shuttles, and pre-arranged charter carriers. LAWA **may** also institute pricing differential strategies to encourage other commercial vehicle operators such as taxis, limousines and ... Uber and Lyft .. to pick up and drop off passengers at the ITF West. ..... Approximately 16 percent of all airport traffic would utilize the ITF West, which is assumed to consist of charter vans, taxis, limos and paid rides, **parking patrons, hotel shuttles**, and private vehicle pick ups and drop offs."*

Gateway to LA is concerned about the impacts to the business and operations of those members who operate hotels and parking facilities, which currently have shuttle buses which are allowed to pick up and drop off passengers in the CTA area.

If the goal under LAMP implementation is to restrict vehicles within the CTA to reduce traffic congestion, it seems counter-intuitive that per the DEIR, shuttle buses which hold scores of passengers, including the hotel shuttles and off- airport parking shuttles, would be restricted under any circumstances from CTA access, while private cars, taxis, Lyft, Uber, limousines - which often carry only one or two passengers - would still be allowed access the CTA. **Gateway requests that LAWA reconsider this restriction on hotel and off-airport parking shuttles accessing the CTA under the LAMP implementation.** Hotel shuttles and off-airport parking shuttles are "aggregators" of passengers whereas taxis, Lyft, Uber and limousines typically transport only one or two passengers per trip.

**Response:** The comment is similar to comment LAMP-PC00024-1; please refer to Response to Comment LAMP-PC00024-1.

**LAMP-PC00030-2**

**Comment:** Further, in the DEIR's Table 17 of Appendix O of the Off-Airport Traffic Study, the table contains vehicle occupancy numbers that appear to be too low for some modes of transportation. Table 17 shows that "Vehicle Occupancy" for "Private Parking Shuttles is only 1.9 passengers on Arrival Level 1, and only 3.4 passengers on Departure Level 2. Similarly, Table 17 shows "Vehicle Occupancy" for "Hotel Shuttles" is only 3.5 passengers on Arrival Level 1 and only 3.9 passengers for Departure Level 2. These Vehicle Occupancy numbers, per Table 17's notes, reflect that these passenger numbers/vehicle occupancy numbers are during "**arrivals peak period**" and "**departures peak period.**" The reality is that both Private Parking Shuttles and Hotel Shuttles operate close to full and sometimes standing room only, during peak periods. **Gateway requests** that LAWA re-examine these vehicle occupancy assumptions for Private Parking Shuttles and for Hotel Shuttles during peak periods, and clarify or correct Table 17.

**Response:** The comment is similar to comment LAMP-PC00024-2; please refer to Response to Comment LAMP-PC00024-2.

**LAMP-PC00030-3**

**Comment:** Additionally, several of the Gateway hotels are closer to the ITF East than to the ITF West. Similarly, several of the Gateway private parking operators are closer to the ITF East than the ITF West. The DEIR seems to indicate that hotel and private parking shuttles must ***only*** use the ITF West. **Gateway requests** clarification in the Final EIR (FEIR) that would accommodate hotel and private parking shuttles being allowed access to both ITFs, as weII as to the CTA. If the goal is to reduce traffic congestion, then if one area is full or congested, the shuttle buses should be allowed the flexibility of dropping off and picking up at any of these facilities.

**Response:** The comment is similar to comment LAMP-PC00024-3; please refer to Response to Comment LAMP-PC00024-3.

**LAMP-PC00030-4**

**Comment:** **Gateway requests** clarification in the FEIR related to the shuttle restriction issue for hotel shuttles and private parking shuttles. Gateway believes the DEIR, as written, unfairly concludes that to reduce congestion in the CTA, that CTA access should be eliminated for hotel and private

parking shuttles which have high passenger occupancy, but at the same time allow CTA access to private vehicles, taxis, Lyft, Uber and limousines, with low passenger occupancy

**Response:** The comment is similar to comment LAMP-PC00024-1; please refer to Response to Comment LAMP-PC00024-1.

**LAMP-PC00030-5**

**Comment:** An alternative, which Gateway requests LAWA to analyze prior to circulation of the FEIR, is to continue to allow **curbside access in the CTA** to commercial vehicles carrying more passengers (for a reasonable fee per shuttle trip), while restricting private vehicles, taxis, Lyft, Uber and limousines to dropping off and picking up passengers on the first level of each CTA parking structure **for a fee**, or alternatively those private vehicles, taxis, Lyft, Uber and limousines can drop off or pick up at one of the ITFs **for free**.

**Response:** Pursuant to CEQA, "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." (CEQA Guidelines § 15126.6(a).) "An EIR need not consider every conceivable alternative to a project. Rather it must include a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation." (Ibid.) Additionally, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters." (CEQA Guidelines § 15204.)

The alternative requested by the commentor would not meet most of the basic objectives of the LAX Landside Access Modernization Program and also avoid or substantially lessen any of the significant effects of the proposed Project. Specifically, it would not change the facilities for the proposed Project nor would it substantively change the traffic associated with the proposed Project. The analysis in the Draft EIR was based on shifting approximately 48 percent of traffic to the CONRAC, ITF East and ITF West. A final determination on mode splits will be done through policy changes, closer to the opening of the proposed facilities.

Section 2.4.6.2 of the Draft EIR, also on page 2-144, states that, "[w]ith implementation of the proposed Project, changes to the LAX Ground Transportation Permit Program, and implementation of pricing differential strategies, LAWA would manage the Project facilities to induce future daily passenger mode share shifts, with most commercial vehicle operators picking-up and dropping-off passengers at the ITF East and ITF West. LAWA would manage the facilities and Airport traffic to effectuate a shift of up to approximately 49 percent of the Airport passenger pick-up and drop-off from the CTA to the ITF East, ITF West, and CONRAC." Additional language on traffic management at the ITF West (Section 2.4.6.2.1 of the Draft EIR) and ITF East (Section 2.4.6.2.2), describes the actions that LAWA may take to encourage use of these facilities and a shift in traffic from the CTA. However, it should be noted that nowhere does the Draft EIR state that specific commercial vehicles would all be barred from operating within the CTA. Section 2.4.6, Transportation Policies at LAX, in Chapter 2, Description of the Proposed Project, of the Draft EIR, describes the existing transportation policies at LAX and the policy changes that LAWA may establish at LAX as part of the proposed Project. These could include changes to fees, pricing, licenses, traffic patterns, and agreements with various commercial vehicle operators at LAX, as well as fees and prices for parking at LAX facilities. Additionally, LAWA may implement tolls for commercial vehicle operators and potentially to the public to access Airport facilities if needed to manage traffic during peak periods and for incident management. The Draft EIR states, in Section 2.4.6.1, on page 2-144, that, "[t]o reduce congestion on the CTA roadways, LAWA would update the LAX Ground Transportation Permit Program to allow and/or require commercial operators to pick-up and drop-off passengers at the ITF East and ITF West.

Concurrently, LAWA would restrict access to the CTA for some commercial operators. LAWA would also institute pricing differential strategies to encourage commercial vehicle operators to pick-up and drop-off passengers at the ITF East and the ITF West."

The operational assumptions identified in Tables 4.12.1-8 and 4.12.1-9 on pages 4.12-31 and 4.12-32 (for 2024 conditions) and Tables 4.12.1-10 and 4.12.1-11 on pages 4.12-34 and 4.12.-36 (for 2035 conditions) in Section 4.12.1, On-Airport Transportation, of the Draft EIR, were assumptions used in the traffic analyses to analyze traffic conditions with approximately 48 percent of the traffic shifted outside of the CTA. LAWA will be evaluating the appropriate actions and incentives to take to affect this shift in traffic to ensure that the investment LAWA is making in improving the landside access system at LAX is successful. LAWA recognizes that there are a number of ways that a shift in approximately 48 percent of vehicle traffic can be achieved, including those suggested by the commentor; LAWA will continue to coordinate with the affected parties and will need to seek approval from the Board of Airport Commissioners to implement any changes to the existing transportation policies at LAX. If different assumptions were made about where different commercial modes would operate, results of the traffic impact analyses would not be meaningfully different from the traffic analyses presented in Section 4.12.1, On-Airport Transportation, and Section 4.12.2, Off-Airport Transportation, of the Draft EIR.

**LAMP-PC00030-6**

**Comment:** Another alternative analysis which **Gateway requests** LAWA at least consider is that the FEIR analyze reclassification of taxis and Transportation Network Carriers ("TNCs") like Lyft and Uber so that these commercial operators are treated in a manner which is consistent and fair compared to other commercial operators (which other commercial operators' shuttles carry more passengers per vehicle) who desire access to the CTA. If the goal is to reduce congestion in the CTA, hotel and private parking operator shuttles should not be arbitrarily penalized and denied access to the CTA, while private vehicles, taxis, Lyft, Uber and limousines which carry fewer passengers get to continue such CTA access.

**Response:** The commentor requests that LAWA reclassify taxis and transportation network carriers (TNC), better known as rideshare companies such as Uber and Lyft, so that they are treated the same as other commercial operators. Pursuant to CEQA, "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." (CEQA Guidelines § 15126.6(a).) "An EIR need not consider every conceivable alternative to a project. Rather it must include a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation." (Ibid.) Additionally, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters." (CEQA Guidelines § 15204.)

The alternative requested by the commentor would not meet most of the basic objectives of the LAX Landside Access Modernization Program and also avoid or substantially lessen any of the significant effects of the proposed Project. Specifically, the reclassification of TNCs would have no effect on any of the analyses contained in the Draft EIR.

As stated in Section 2.4.6, Transportation Policies at LAX, in Chapter 2, Description of the Proposed Project, of the Draft EIR, LAWA may institute policy changes at LAX, which could include changes to fees, pricing, licenses, traffic patterns, and agreements with various commercial vehicle operators at LAX, as well as fees and prices for parking at LAX facilities. Additionally, LAWA may implement tolls for commercial vehicle operators and potentially to the public to access Airport facilities if needed to manage traffic during peak periods and for incident management.

As noted in the Response to Comment LAMP-PC00030-5, the operational assumptions identified in Tables 4.12.1-8 and 4.12.1-9 on pages 4.12-31 and 4.12-32 (for 2024 conditions) and Tables 4.12.1-10 and 4.12.1-11 on pages 4.12-34 and 4.12.-36 (for 2035 conditions) in Section 4.12.1, On-Airport Transportation, of the Draft EIR, were assumptions used in the traffic analyses to analyze traffic conditions with approximately 48 percent of the traffic shifted outside of the CTA. LAWA will be evaluating the appropriate actions and incentives to take to affect this shift in traffic to ensure that the investment they are making in improving the landside access system at LAX is successful. LAWA recognizes that there are a number of ways that a shift in approximately 48 percent of vehicle traffic can be achieved, including those suggested by the commentor; LAWA will continue to coordinate with the affected parties and will need to seek approval from the Board of Airport Commissioners to implement any changes to the existing transportation policies at LAX. If different assumptions were made about where different commercial modes would operate, results of the traffic impact analyses would not be meaningfully different from the traffic analyses presented in Section 4.12.1, On-Airport Transportation, and Section 4.12.2, Off-Airport Transportation, of the Draft EIR.

**LAMP-PC00030-7**

**Comment:** 2. The DEIR shows a diagram of existing shuttle routes, but does not include a diagram or analysis of future shuttle routes with the LAMP project implemented. **Gateway requests** that the FEIR show such a "future, with project" diagram in its FEIR

**Response:** The Draft EIR includes analysis and diagrams of future shuttle routes with the proposed LAX Landside Access Modernization Program implemented. As noted in the Response to Comment LAMP-PC00030-5, the operational assumptions identified in Tables 4.12.1-8 and 4.12.1-9 on pages 4.12-31 and 4.12-32 (for 2024 conditions) and Tables 4.12.1-10 and 4.12.1-11 on pages 4.12-34 and 4.12.-36 (for 2035 conditions) in Section 4.12.1, On-Airport Transportation, of the Draft EIR, were assumptions used in the traffic analyses to analyze traffic conditions with approximately 48 percent of the traffic shifted outside of the CTA. Based on those assumptions, commercial vehicle shuttles were assumed to use routes to and from the ITF West and ITF East commercial vehicle rotaries, as identified in Chapter 2, Description of the Proposed Project, Figure 2-24 (ITF West) and Figure 2-29 (ITF East). The shuttles were modeled using logical surface routes to and from the ITF West and ITF East based on their destinations. Shuttles and buses that are local were assumed to utilize the ITF West; shuttles and buses that serve more regional destinations were assumed utilize the ITF East, closer to the highway system.

**LAMP-PC00030-8**

**Comment:** 3. **Gateway requests** clarification in the FEIR related to the future location of the **taxi, limousine and TNC holding area** under LAMP implementation. Fairly recently, this holding area was shifted by LAWA to allow vehicular access to the holding area from 98th Street, which access has negatively impacted traffic conditions along 98th Street and thus negatively impacted Gateway property owners and businesses due to the increased congestion long this corridor. The Off-Airport Traffic Study in Appendix O appears to be silent on the future location or relocation of the taxi holding area under LAMP implementation. Gateway strongly urges LAWA to analyze the impacts of the existing taxi holding area in terms of vehicular counts, and that the FEIR will reflect a location which does not allow access onto 98th Street within the BID area.

**Response:** There are no plans to relocate the taxicab holding area as part of the proposed Project. LAWA does not anticipate the LAX Landside Access Modernization Program would affect existing traffic patterns associated with these holding lots. At this time, the commercial vehicle holding area (used by limousine and TNCs) located in Lot C, would remain in Lot C, but would be reconfigured to allow for the construction of the ITF West.

The taxi operation had worked such that every taxi driver in the City of Los Angeles is only allowed into the Airport every fifth day. This system was established in order to avoid taxis inundating the Airport. However, sometimes the demand for taxis exceeds the supply. During those times, a "code pink" is called, which authorizes any taxi drivers in the area to receive their trip ticket at the holding lot to enter the Airport. Taxi drivers were in the habit of waiting near the taxi holding lot in the hope that this code pink announcement would be called. They were parking in parking meter spaces along 98th Street, which reduced available parking for local businesses.

LAWA worked with LADOT to establish a queuing area along the south side of Westchester Parkway from Jenny Avenue to Will Rogers Street for taxis that are waiting for this code pink, and move them away from 98th Street. Only taxis that are queued along Westchester Parkway are allowed to enter the holding lot when the code pink is called.

This operation, as described by LAWA Operations on September 19, 2016 (the first official day of the operation), works as follows:

1) A starter has been placed at Westchester Parkway to enter the order in which taxis arrive and get in the queue. The starter dispatches the taxis when additional vehicles are needed in the holding lot. S/he will stagger the dispatch of taxis so that there is not the possibility of a taxi passing the taxi in front of it.

2) Taxis travel up Westchester Parkway, turn right on Airport Boulevard, right on 98th Street, right on Vicksburg Avenue, right on 96th Street and then make a right into the lot. The entry to the taxi holding lot from 98th Street has been closed off. This creates an organized entryway into the taxi holding lot.

3) Taxis called as part of the code pink process are being directed to go to Westchester Parkway where they will be dispatched to the taxi holding lot.

Additional measures that LAWA has taken to address Gateway to LA concerns include:

- Speed bumps were installed at the exit of the taxi holding lot.
- "Ladder-style" crosswalks were installed at the intersection of Vicksburg Avenue and 98th Street and at Avion Drive and 98th Street.
- Parking meters were removed along the east side of Vicksburg Avenue north of 98th Street to establish two northbound lanes of traffic on Vicksburg Avenue between 96th Street and 98th Street.
- Requested that LADOT install a "No U-Turn" restriction on westbound 96th Street at Vicksburg Avenue.

**LAMP-PC00030-9**

**Comment:** 4. In terms of essential streets that serve Gateway to LA properties and businesses, 98th Street is second only to Century Boulevard in terms of its importance to Gateway. Under LAMP implementation, the vehicular traffic along 98th Street will be significantly altered and increased: 98th Street will be extended to provide an east-west connection between the 405, the CONRAC, the ITF East and the ITF West; a new or altered intersections will be created; a new segment of 98th Street will be constructed beneath the METRO/LAX Crenshaw rail line; and an existing segment of 98th Street will be widened. **Despite the amount of additional traffic that will now impact 98th Street, out of 183 intersections studied in the DEIR, only one intersection along 98th Street was analyzed.** Gateway does not understand this oversight, especially related to future conditions, and whether the alterations to and additional traffic along 98th Street will cause significant impacts. If only one intersection (98th Street and Airport Boulevard) along 98th

Street was studied, how can the DEIR reach a conclusion that no further mitigation measures are required along 98th Street so that under LAMP implementation 98th Street does not end up in a gridlocked roadway condition? **Gateway requests** that additional 98th Street intersections be studied prior to circulation of the FEIR, including 98th Street and Bellanca, 98th Street and Aviation, 98th Street and Concourse Way, and 98th Street and Sepulveda, and that if there are impacts, that appropriate mitigation measures be recommended in the FEIR.

**Response:** The 98th Street Options Analyses provided as Appendix W of the Traffic Study (starting on PDF page 10114 of Appendix O of the Draft EIR) details various options and analyzes operational performance at key intersections along the 98th Street corridor including specific truck loading and management issues. Section 4.12.2.7.4 of the draft EIR summarizes these analyses. An evaluation of all performance characteristics was performed and the preferred option for 98th Street Corridor was recommended in the Study.

Please see Response to Comments LAMP-PC00028-6 and LAMP-PC00028-7 for additional discussion of traffic impacts on 98th Street and its intersections.

**LAMP-PC00030-10**

**Comment:** 5. While the DEIR contains discussion related to the intersection of Bellanca Avenue and Century Boulevard, it was not clear based on Gateway's review of whether there was adequate analysis of future **queuing or "stacking" conditions** on both 98th Street (for vehicles headed westbound on 98th who are turning left onto Bellanca), as well as for cars travelling southbound on Bellanca trying to turn onto Century Boulevard. Especially during peak periods, Gateway has concerns about whether the respective intersections' Level of Service and the possibility of queuing or stacking of vehicles at the Bellanca/98th Street intersection and at the Bellanca/Century intersection under LAMP implementation were adequately analyzed. **Gateway requests** that the FEIR clarify these impacts, and if needed to include adequate mitigation measures.

**Response:** Please see Response to Comment LAMP-PC00030-9 above, as well as LAMP-PC00028-8. Based on the traffic projections and level of service calculations, (see Table 1 in Response to Comment LAMP-PC00028-6), the intersections along 98th Street would be operating at LOS D or better. LOS D equates to the following conditions: Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups (see Table 4.12.2-2 in Section 4.12.2 of the Draft EIR). This is an indication that adequate storage to avoid excessive queuing on the streets approaching these intersections would be available at the intersections noted in the comment.

**LAMP-PC00030-11**

**Comment:** 6. In a collaborative effort several months ago, Gateway representatives, the City of Los Angeles Planning Department, the City's outside design team, and LAWA worked on streetscape and design plans leading to the creation (but not implementation) of the **Century Boulevard Streetscape Plan**. While the DEIR references the Century Boulevard Streetscape Plan and its design guidelines, and *seems* to indicate its implementation under the LAMP improvements, it is not included as an actual mitigation measure. **Gateway requests** that the FEIR clarify whether implementation of the Century Boulevard Streetscape Plan will be done under the LAMP program, and a timetable showing when the Streetscape Plan improvements will be implemented. Gateway is very concerned that adequate sidewalks to enhance pedestrian flow, bicycle lanes, pedestrian connectivity, and pedestrian and bicycle safety impacts be mitigated under the LAMP improvements.

**Response:** The Department of City Planning is in the process of finalizing a streetscape plan for W. Century Boulevard (the Century Corridor Streetscape Plan http://www.lawa.org/ourLAX/CurrentProjects.aspx?id=8767); while LAWA will implement the streetscape plans along portions of W. Century Boulevard it owns, when projects are undertaken that require implementation of the Plan, implementation of other portions is up to the individual property owners, when they undertake improvements to their property. LAWA would only be responsible for implementing the portions of the streetscape plan along the frontages of property it owns, and only when a project trigger, as described in the Plan, would require the streetscape to be implemented. The LAX Landside Access Modernization Program includes the LAX Design Guidelines as part of the proposed Project (see Appendix B of the Draft EIR), which includes streetscape elements that LAWA would implement when it implements roadway improvements.

As part of the LAX Landside Access Modernization Program, LAWA would be adding an eastbound lane to W. Century Boulevard between Sepulveda Boulevard and Aviation Boulevard. When that improvement is made, LAWA would implement the streetscape, bike, and pedestrian improvements identified in Chapter 2, Description of the Proposed Project, of the Draft EIR, which are consistent with the proposed Century Corridor Streetscape Plan. Additionally, elements of the Century Corridor Streetscape Plan would be implemented when LAWA extends Concourse Way north of Century Boulevard, and also when future potential related development occurs on the parcels that LAWA owns along W. Century Boulevard between Aviation Boulevard and La Cienega Boulevard. Improvements would be implemented consistent with the requirements of the proposed Century Corridor Streetscape Plan. These improvements would be made in the latter half of Phase 1.

The proposed Project would mitigate impacts to existing pedestrian and bike safety for portions of roadways and sidewalks that are impacted by the proposed Project. The proposed Project would not address any existing deficiencies along property it does not own or does not impact. As indicated in Section 2.2 of the Draft EIR, one of the inherent objectives of the proposed Project is to provide and enhance new access options for all modes of travel. It is not the purpose of an EIR to fix or mitigate existing environmental issues, as suggested in the comment. (CEQA Guidelines Section 15126.2(a); *Watsonville Pilots Association v. City of Watsonville (*2010) 183 Cal.App.4th 1059, 1094 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”].

**LAMP-PC00030-12**

**Comment:** 7. The DEIR contained little discussion regarding a **possible pedestrian bridge over Sepulveda Boulevard** that would link Century Boulevard properties, businesses and their patrons to the CTA. The only discussion was in the FEIR was that "LAWA would preserve a pedestrian connection between the CTA and W. Century Boulevard as part of the proposed Project through **either** an at-grade crossing or future pedestrian bridge." A pedestrian bridge linking Century Boulevard across Sepulveda and ultimately to the CTA would provide much **greater safety to pedestrians** than an at-grade pedestrian crossing, and is a priority to Gateway owners and businesses. **Gateway requests** that the FEIR reflect further analysis including a conceptual pedestrian ridge plan in the FEIR.

**Response:** The comment is similar to comment LAMP-PC00026-4; please see Response to Comment LAMP-PC00026-4.

**LAMP-PC00030-13**

**Comment:** 8. From Gateway's review of the DEIR, it is not clear to Gateway whether the ITF East will accommodate LAWA employee parking ***and*** LAX passenger parking. While our review of the

DEIR indicates that the ITF East may provide 8,300 parking spaces in a structure, there is also discussion that alternatively, the ITF East may provide a 1,400-parking space surface lot, which is a difference of 6,900 parking spaces. **Gateway requests** that the FEIR provide clarification about: (a) the likely number of total parking spaces that will be provided in the ITF East; (b) when those ITF East parking spaces will become available; and (c) who the ITF East parking spaces will accommodate (how many parking spaces for LAWA employees, and how many parking spaces for LAX passengers); and (d) **where LAWA employee parking** will be located if **off-airport** and within the BID's borders.

**Response:** Alternatives to the proposed Project were presented and evaluated in the Draft EIR in accordance with the California Environmental Quality Act (CEQA) guidelines. In accordance with Section 15126.6(b) of the State CEQA Guidelines, the alternatives presented in Chapter 5 of the Draft EIR were selected to evaluate means for avoiding or substantially reducing the significant impacts of the proposed LAX Landside Access Modernization Program. The commentor is referring to the "No ITF Parking Structures Alternative" (see page 5-22 of the Draft EIR), in which the parking structure at the ITF East would be replaced with a surface lot. However, this alternative was not carried forward for detailed evaluation in the Draft EIR as it does not avoid or substantially lessen the significant impacts of the proposed Project.

As discussed in Chapter 2, Description of the Proposed Project, of the Draft EIR, the parking structure at the ITF East would consist of approximately 8,300 parking spaces (see page 2-105). None of these parking spaces would be designated for employee parking. The ITF East would be constructed during the first phase of the Project, estimated to begin in approximately 2019 and conclude by end of approximately 2022 (see page 2-181), at which point ITF parking spaces would become available.

The LAX Landside Access Modernization Program would provide for 3,300 employee designated parking spaces at the consolidated rental car facility (CONRAC) (see page 2-125). No other employee-designated parking is proposed under the LAX Landside Access Modernization Program.

Also, please note that parking impacts are generally not physical environmental impacts that must be addressed in CEQA documents. (See *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656.)

**LAMP-PC00030-14**

**Comment:** Additionally, in terms of the DEIR analysis concerning **"Potential Future Collateral Development"** sites, land uses were referenced but did not include the possible land use of private parking facilities. Since the DEIR indicates that the ITF East may provide 8,300 parking spaces in a structure, or alternatively, the ITF East could provide a 1,400-parking space surface lot, which is a difference of 6,900 parking spaces, **Gateway requests** that one of the land uses for "Potential Future Collateral Development" sites includes private commercial parking facilities, as well as greenbelt space, to provide flexibility.

**Response:** See Response to Comment LAMP-PC00030-13 regarding the number of parking spaces at the ITF East.

Potential uses for the Potential Future Related Development are discussed in Section 11 of the proposed LAX Specific Plan revisions (see Draft EIR Appendix D, LAX Specific Plan Revisions, as revised in Chapter 3, Corrections and Additions to the Draft EIR). Land uses in the Potential Future Related Development areas, designated as new "Airport Landside Support Subarea", would include all of the uses permitted in the C2 Zone, as specified in Los Angeles Municipal

Code (LAMC) Section 12.14, which includes automobile parking buildings or buildings containing automobile parking. However, as stated on page 22 of Appendix D, "[p]rojects located in the Airport Landside Support Subarea are not required to provide on-site or off-site automobile parking to encourage the use of adjacent shared public parking structures."

Also, please note that parking impacts are generally not physical environmental impacts that must be addressed in CEQA documents. See *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App. 4th 656.

**LAMP-PC00030-15**

**Comment:** Additionally, since some of these Potential Future Collateral Development sites are anticipated to be used temporarily for construction staging based on the LAMP facilities' building/development schedule, a **timeline** should be provided in the FEIR of approximately ***when*** these sites, which the EIR estimates could accommodate up to 900,000 square feet of commercial development, could be available for future collateral development.

**Response:** As discussed in Section 2.6.2 in Chapter 2, Description of the Proposed Project, of the Draft EIR, several construction staging areas have been identified for the proposed Project (see Figure 2-50). As discussed in Section 2.7 of the Draft EIR, upon completion of the Phase 1 Project components by 2023 (see page 2-175), the construction staging parcels adjacent to the CONRAC, ITF East, APM MSF, and ITF West would be available for potential future related development (see Figure 2-51). While some Project components may complete before 2023, it is likely that these areas would be needed through the completion of Phase 1 construction. Therefore, these parcels would be available as early as 2024 for potential future related development.

**LAMP-PC00030-16**

**Comment:** 9. The EIR indicates in Section 1.4.1.11.2 related to **Law Enforcement and Police related impacts** that:

*"The proposed Project would result in an increase of uses that would generate a demand for police protection services by passengers and employees. The proposed Project **could** include the placement of a satellite LAWAPD facility office within proximity to the CONRAC or ITF East to maintain adequate response times across the Project site, if needed. As such, the proposed Project would **not** result in a substantial increase in on-airport population or land use changes that would require a substantial increase in law enforcement services to maintain adequate services or require new or expanded facilities without providing adequate mechanisms for addressing these needs. The proposed Project would also incorporate various planned security features to reduce increased demand on LAWAPD, including but not limited to security fencing, surveillance cameras, security lighting, and emergency phones/call boxes. As discussed in Section 4.11.2, Law Enforcement, the proposed Project would have a less than significant impact with incorporation of mitigation measures."*

Gateway is concerned about adequate police protection, considering the millions of new square feet of development under the LAMP within the Gateway area and a significant increase of people and vehicular traffic coming to the new development which will include the Consolidated Rental Car Facility (CONRAC); the lntermodal Transportation Facilities (ITF East and ITF West), the Maintenance Facilities, the Automated People Mover System (APM) and its stations.

These facilities alone - i.e., CONRAC, ITFs, Maintenance Facilities, APM and its stations - without counting any *"potential future related development*" will result in **over 10 million square feet of**

**new development**, require many employees to staff each facility, attract thousands of people and airport passengers to the CONRAC, ITFs and APMs daily, and attract thousands of cars either dropping off or picking up passengers, or parking. The facilities are being developed to limit vehicular traffic into and out of the Central Terminal Area (CTA) roadways, meaning that vehicles will be driving to and leaving from the "landside" non-airport area around Gateway to LA properties, in unprecedented numbers.

However, the **Law Enforcement mitigation measures** called for in the EIR are only for new lighting, cameras, call boxes and fencing. Instead of developing new police facilities and adding police personnel, the EIR is equivocal and states that the proposed Project ***"could"*** include the placement of a satellite LAWAPD facility office within proximity to the CONRAC or ITF East, but it is not a mitigation measure.

The EIR states: "At this time, LAWA has not included a satellite [police] office in the proposed Project description ..." [Page 4.11-43 of EIR]

Gateway believes that the mitigation measure related to law enforcement, requiring only new lighting, cameras, call boxes and fencing, is not adequate to address the exponential increase in people, vehicular traffic and over 10 million square feet of new development under the LAMP improvements (CONRAC, ITF East, ITF West, Maintenance Facilities, APM and its stations). **Gateway requests** that the Final EIR reflect the inclusion of a new, fully-staffed satellite LAPD station to be located within the Gateway to LA boundaries.

**Response:** As described in Chapter 2, Description of the Proposed Project, of the Draft EIR, implementation of the proposed Project and its components would include the construction of the Landside Access Modernization Program Project and the potential future related development. The Landside Access Modernization Program Project includes approximately 12.7 million sq. ft. of development, while the future related development analyzed within the Draft EIR would accommodate up to 900,000 sq. ft. of commercial development. However, most of the development associated with the proposed Project is in the form of parking garages or vehicle storage areas, totaling approximately 10.2 million square feet. Approximately 1.5 million square feet of the proposed Project development would be considered occupied areas. See Section 2.4 in Chapter 2, Description of the Proposed Project, of the Draft EIR.

The proposed Project would consolidate existing uses and shift the location where different modes of traffic operate within the CTA and on the surrounding street network, with the purpose of improving access to LAX and relieving traffic congestion. Please see Section 6.3.2 of the Draft EIR and Response to Comment LAMP-AL00008-2 for discussion on why the proposed Project would not directly or indirectly cause passenger growth at LAX. Also, Section 6.3.2 of the Draft EIR, as well as the project description in Chapter 2, explain why the proposed Project would not create an “exponential increase” in people or vehicular traffic using LAX.

As discussed on page 4.11-43 in Section 4.11.2, Law Enforcement, of the Draft EIR, the proposed Project would introduce new facilities to the site, including an Automated People Mover (APM), Intermodal Transportation Facilities (ITFs), and a Consolidated Rental Car Facility (CONRAC). Operation of the proposed Project would result in a dispersion of Airport passengers, visitors, and other persons utilizing LAWA facilities across a larger area, which may contribute additional demand for law enforcement services. As discussed on page 4.10-29 in Section 4.10, Population and Housing, of the Draft EIR, operation of the proposed Project would include a net increase of approximately 100 employees, which would not constitute a substantial increase in on-Airport employment compared to the existing 33,200 employees currently located on the LAX Footprint.[1] Nonetheless, as noted on page 4.11-43 of the Draft EIR, this increase in employees in combination with other Airport passengers, visitors, and other person utilizing LAWA facilities

could result in a minor increase in the number of calls for police protection services within the Project site. As a result of the increase of occupied area, the proposed Project could demand an increase in policing activities and vehicle-related incidents (e.g., auto thefts and auto break-ins). Additional law enforcement personnel may be required to patrol the areas particularly outside of the CTA, such as the West and East ITFs and CONRAC.

As discussed on page 4.11-44 of the Draft EIR, while the proposed Project would contribute additional demand for law enforcement personnel, LAWA would continue its existing practice of working with the Los Angeles World Airports Police Division (LAWAPD) and Los Angeles Police Department (LAPD) to routinely evaluate and provide additional officers, supporting administrative staff, and equipment, to keep pace with increases in activity associated with the proposed Project in order to maintain a high level of law enforcement services. This would be achieved through LAWA notification to LAWAPD and LAPD regarding pending development and construction and through LAWA review of status reports on law enforcement services at LAX.

As discussed on page 4.11-43 of the Draft EIR, LAWAPD has indicated that a satellite office within proximity to the CONRAC and ITF East may be desirable. LAWA has not included a satellite office in the proposed Project description; however, as noted on page 4.11-43, there is sufficient room in either the CONRAC or ITF East for a satellite office, if it is determined in the future, based on the ongoing consultation with LAWAPD and LAPD described above, that a satellite office should be provided in this area.

Based on the above, and as further discussed in Section 4.11.2.5 of the Draft EIR, operation of the proposed Project would have a less than significant impact on law enforcement services, using the significance thresholds listed in Draft EIR Section 4.11.2.4. Therefore, no operational mitigation measures such as those suggested by the commentor would be required.

[1] The LAX Footprint encompasses all properties owned by LAWA within and outside the CTA.

**LAMP-PC00030-17**

**Comment:** 10. Similarly, regarding mitigation measures as related to **fire facilities and staffing** under the LAMP improvements, Gateway is concerned as to whether the mitigation measures proposed in the DEIR are adequate considering the LAMP facilities which will bring over 10 million square feet of new development, including the CONRAC, two ITFs and APM system and other improvements, which facilities will help facilitate and transport thousands of passengers daily off-airport. For example, the height of the Automated People Mover system within Gateway's area will range from 50 to 70 feet in the air. If there are **mechanical malfunctions** or acts of terrorism, is there an existing fire station within close distance with trained fire personnel and equipment to reach a rail car that is full of passengers who need to be de-boarded? No such discussion was found in the DEIR. Instead, the DEIR reflected mitigation measures meant for a small development, such as compliance with fire and building code, new fire hydrants, sprinklers and fire extinguishers, which seems inadequate to protect neighboring Gateway properties after the massive LAMP facilities are developed and activated. **Gateway requests** that the Final EIR reflect the inclusion of a mitigation measure which adds specially-trained fire personnel, equipment and possibly an expanded fire station facility within Gateway's border to mitigate possible impacts under the LAMP improvements.

**Response:** As discussed in Response to Comment LAMP-PC00030-16, most of the development associated with the proposed Project is in the form of parking garages or vehicle storage areas, totaling approximately 10.2 million square feet. Approximately 1.5 million square feet of the proposed

Project development would be considered occupied areas. See Section 2.4 in Chapter 2, Description of the Proposed Project, of the Draft EIR.

As indicated in Section 4.11.1.3.2 of the Draft EIR, five LAFD fire stations currently serve the Project site – Fire Stations 5, 51, 67, 80, and 95. LAFD has indicated that Fire Station 95 is currently equipped with a truck containing a 100-foot ladder (refer to Table 4.11.1-5 on page 4.11-17 of the Draft EIR). Fire Station 95 is staffed with trained personnel to operate the 100-foot ladder during emergency incidents.

As stated on page 4.11-24 of the Draft EIR, in the event of a mechanical failure along the APM guideway, LAFD would be the first responder. The height of the elevated guideway (which ranges between 50 and 70 feet above grade) could pose accessibility constraints depending on the location of the incident, and subsequently affect LAFD's response to reach the APM guideway. As further described on page 4.11-24 of the Draft EIR, LAFD would access the APM with a 100-foot ladder equipped by Fire Station 95.

As discussed on page 4.11-24 of the Draft EIR, LAFD has indicated through consultation during preparation of the Draft EIR that the construction of a parallel pedestrian platform alongside the APM guideway would ease LAFD's ability to respond to passengers on the guideway. The APM guideway, as proposed, would be constructed in compliance with the California Public Utility Commission (CPUC) requirements to provide an emergency walkway along the entire guideway to provide egress for passengers and emergency personnel in the event of an emergency. This CPUC-mandated emergency walkway would serve the same purpose as a parallel pedestrian platform requested by LAFD.

As demonstrated in Draft EIR Section 4.11.1.5, adequate fire protection response would continue to be provided throughout the Project site upon implementation of the proposed Project. Fire Station 95 would be staffed with personnel trained to operate the use of a 100-foot ladder in the event that emergency response along the APM guideway is required.

Additionally, as indicated on page 4.11-24 of the Draft EIR, the proposed Project components would be required to comply with the fire and building code requirements identified in Section 4.11.1.3 of the Draft EIR, such as the inclusion of safety features including fire hydrants, fire sprinklers, and fire extinguishers. Incorporation of these required fire safety features would reduce demand on fire protection and emergency services.

Based on the above, and as further discussed in Section 4.11.1.5 of the Draft EIR, operation of the proposed Project would have a less than significant impact on fire protection and emergency services using the significance thresholds listed in Draft EIR Section 4.11.1.4, and no operational mitigation measures such as those suggested by the commentor would be required.

**LAMP-PC00030-18**

**Comment:** 11. Likewise, with the addition of new traffic circulation patterns, over 10 million square feet of new development under the LAMP, including the CONRAC, two ITFs, the APM system and other improvements, which facilities will help facilitate and transport thousands of passengers daily off-airport, Gateway has concerns about **emergency response times** as the DEIR should have identified delays in response times and proposed mitigation measures. Gateway's hotels rooms hold thousands of guests daily and Gateway businesses employ many service and professional personnel. If there is an emergency, Gateway owners are concerned about delays in emergency vehicles responding to the situation on a timely basis. Gateway requests that the FEIR clarify emergency response times, identify possible delays with development of the LAMP facilities, and propose adequate mitigation measures to be responsive.

**Response:** As discussed in Response to Comment LAMP-PC00030-16, most of the development associated with the proposed Project is in the form of parking garages or vehicle storage areas, totaling approximately 10.2 million square feet. Approximately 1.5 million square feet of the proposed Project development would be considered occupied areas. See Section 2.4 in Chapter 2, Description of the Proposed Project, of the Draft EIR. The following address the comments regarding the proposed Project's impacts on fire protection and law enforcement emergency response, respectively.

**Fire Protection Emergency Response**

As discussed in on page 4.11-19 in Section 4.11.1.3.2 of the Draft EIR, the five fire stations serving the Project site (Fire Stations 5, 51, 67, 80, and 95) currently maintain adequate equipment and personnel to meet the response times required to support LAX airside operations and landside uses. The most recent average response times for each of the five LAFD fire stations serving the Project site that were available during preparation of the Draft EIR are provided in Table 4.11.1-6 on page 4.11-20 of the Draft EIR. As shown in the table, the average response time for the five LAFD fire stations serving the Project site is 4 minutes and 54 seconds, with the responding distance ranging from 0.4 to 3.9 miles.

As indicated in Section 4.11.1.5 of the Draft EIR, construction of the proposed Project, including the proposed roadway improvements, would contribute to increases in traffic congestion at various locations within the Project site until year 2024. As discussed on pages 4.11-20 and 4.11-21 of the Draft EIR, LAFD utilizes S. Sepulveda Boulevard, W. Century Boulevard, Airport Boulevard, Aviation Boulevard, S. La Cienega Boulevard, and Westchester Parkway/W. Arbor Vitae Street as emergency access routes throughout the Project area. As indicated on page 4.11-21 of the Draft EIR, construction activities would include temporary and intermittent local roadway and/or lane closures along these LAFD emergency response routes.

As noted on page 4.11-21 of the Draft EIR, the LAFD's average response times in and around the Project site as a result of these roadway closures could increase the response distance and traffic conditions, particularly for Fire Stations 5, 51, 67, and 95 which would be a significant impact. Fire Station 80 primarily responds to incidents at LAX only; therefore its existing response activities are unlikely to be affected by construction of the proposed Project.

To address these significant impacts on LAFD's emergency response activities during construction, LAWA has proposed Mitigation Measures MM-ST (LAMP)-1, Construction Traffic Project Task Force, MM-ST (LAMP)-2, Maintenance of Traffic, MM-ST (LAMP)-3, Worksite Traffic Control Plans, MM-ST (LAMP)-4, Roadway Closure Restrictions, and MM-ST (LAMP)-5, Traffic Maintenance During Construction. (see Section 4.11.1.7 of the Draft EIR). As stated in Section 4.11.1.8 on page 4.11-33 of the Draft EIR, with implementation of these mitigation measures, the proposed Project's significant impacts on fire protection and emergency services during construction would be reduced to a level that is less than significant, and less than cumulatively considerable, because these measures would facilitate effective coordination with LAFD to meet its standards and requirements. Implementation of the Project Task Force would ensure the availability of emergency access and adequate response times during all construction phases.

With regards to operational impacts, as discussed in Chapter 2 of the Draft EIR, the proposed Project would consolidate existing uses and shift the location where different modes of traffic operate within the CTA and on the surrounding street network, with the purpose of improving access to LAX and relieving traffic congestion. In addition to construction of the proposed APM guideway, ITFs, APM Maintenance and Storage Facility (MSF), and CONRAC, the proposed Project would involve new roadway segments, additional lanes, realignment of segments of some existing roads, restriping, modified freeway ramps, new or realigned driveway, roadway closures,

and intersection improvements to serve the Project components. The proposed Project would also include pedestrian sidewalks to direct pedestrian movement off the roadways.

As discussed on page 4.11-22 of the Draft EIR, implementation of these roadway improvements would reduce traffic congestion and the demand for curb-fronts, which would reduce potential for automobile accidents and automobile/pedestrian conflicts, and other automobile-related emergency response incidents at the Airport. Further, the improved traffic flow associated with the proposed Project would improve response times for LAFD over time. As such, the proposed roadway improvements would not restrict emergency access, increase response times, or extend station responses distances.

Fire Station 95, which is located within the Project site boundaries, would be the first responder to most incidents, with support as needed from the nearby stations. Each of the new facilities introduced by the proposed Project may contribute demand for fire protection services by passengers, employees, and other persons utilizing these facilities. As discussed in Section 4.10, Population and Housing, of the Draft EIR, operation of the proposed Project would include a net increase of approximately 100 employees, potentially resulting in an increase in emergency incidents within the Project site. Because the proposed Project involves the consolidation of existing jobs within the area, primarily in association with rental car facilities in the CONRAC, the 100 new employees are not likely to substantially increase the number of emergency incidents on the proposed Project site. However, operation of the proposed Project components would not have a significant impact on fire protection. A further discussion of fire protection impacts for selected proposed Project components is provided below.

**Automated People Mover**

As discussed on pages 4.11-24 and 4.11-25 of the Draft EIR, the APM system would involve the operation of multiple automatic and driverless trains along a 2.25-mile long guideway at a height of between 50 and 70 feet above grade. There would be six stations along the guideway, as well as vertical circulation cores and pedestrian walkways connecting the guideway to the stations. The operation of the APM system would contribute to demand for LAFD services due to the activity of Airport passengers, visitors, employees, and other persons utilizing the system. However, as identified in Chapter 2, Description of the Proposed Project, of the Draft EIR, the proposed Project would incorporate fire safety features in compliance with fire and building code requirements identified in Section 4.11.1.3 of the Draft EIR.

In the event of an APM failure (i.e., loss of power), the LAFD would be the first responder. The height of the elevated guideway could pose accessibility constraints depending on the location of the incident, and subsequently affect response times. The LAFD would access the APM with a 100-foot ladder from Fire Station 95; however, this may be difficult due to variations in elevation, topography, and the street network operating underneath the guideway. As an alternative, the LAFD suggested during a meeting to discuss the proposed Project, the construction of a parallel pedestrian platform alongside the APM to allow ease of access for emergency personnel and passengers. The APM guideway, as proposed, and in compliance with CPUC requirements, would have an emergency walkway along the entire guideway which would provide egress for passengers in the event of an emergency as well as access for emergency personnel, which serves the same purpose as a parallel pedestrian platform requested by LAFD.

The APM system would have six stations, each of which would be equipped with stairs and emergency access in accordance with fire and building code requirements identified in Section 4.11.1.3 of the Draft EIR. The APM system would also be equipped with an electronic communications system connected to each APM car and station, which can be used to

communicate with passengers and employees in the event of equipment malfunction, system delays, or emergencies.

Other components of the APM system include the APM MSF and three or more traction power substations. The MSF would be constructed east of the ITF West and would be an elevated structure with tracks into the structure matching the height of the APM guideway. In order to support the operations and maintenance of the APM operating system, limited quantities of hazardous materials, such as oils, lubricants, paints, and other petroleum-based substances would be used within the MSF. The traction power substations would house equipment such as transformers, rectifiers, cabling, and switchgear. The use and storage of these hazardous materials and equipment would be in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Each of these support facilities would comply with fire and building code requirements identified in Section 4.11.1.3 of the Draft EIR by providing adequate emergency access and incorporating fire safety features.

APM system operations would not restrict emergency access, increase response times, extend station response distances, or decrease fire flow beyond the standards maintained by the agencies serving LAX and the surrounding communities. The APM system would also not require the need for a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain adequate service levels. Therefore, operation of the APM system would have a less than significant impact on fire protection and emergency services.

**Intermodal Transportation Facilities**

As discussed on page 4.11-25 of the Draft EIR, the proposed Project includes the West and East ITFs, which are buildings that could provide airport amenities, commercial amenities, ticketing/information kiosks, and multi-level parking garages. The operation of the ITFs would contribute demand for LAFD services due to the activity of Airport passengers, visitors, employees, and other persons utilizing the facilities at these locations. However, the ITFs would include multiple ingress and egress points for emergency access, as well as other fire safety features including fire hydrants, fire sprinklers, and fire extinguishers. As identified in Chapter 2, Description of the Proposed Project, of the Draft EIR, the proposed ITFs would include fire safety features in compliance with fire and building code requirements identified in Section 4.11.1.3 of the Draft EIR.

Neither the ITF East nor the ITF West operations would restrict emergency access, increase response times, extend station response distances, or decrease fire flow beyond the standards maintained by the agencies serving LAX and the surrounding communities. The ITFs would also not require the need for a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain adequate service levels. Therefore, operation of the ITFs would have a less than significant impact on fire protection and emergency services.

**Consolidated Rental Car Facility**

As discussed on pages 4.11-25 through 4.11-27 of the Draft EIR, the proposed CONRAC would include approximately 6 million square feet of floor space between 3- to 4-stories, and would consist of a Customer Service Building (CSB), Rental Car Ready/Return Parking Area, a Vehicle Storage Area, and a Quick Turnaround Area (QTA). The CSB and Rental Car Ready/Return Parking Area would be occupied primarily by rental car customers and employees. The Vehicle Storage Area would be an overflow parking area and the QTA would provide facilities for multi-level fueling, washing, and vehicle maintenance.

Operation of the CONRAC would involve the use and storage of hazardous materials, such as oils, lubricants, and other petroleum-based substances. However, these materials and uses are present within the existing rental car facilities that would be relocated to the CONRAC. Fire Station 95 is currently under capacity constraints and cannot staff its on-site HazMat company without assistance from supporting stations (see Section 4.11.1.3.2 of the Draft EIR). The CONRAC would result in the relocation of off-site rental car operations to a centralized facility at LAX. The centralized facility would result in the transfer of a portion of these existing rental car operations, such as fueling, quick-turnaround, customer service, and short-term storage. The rental car companies may retain their off-site locations for long-term storage, continued heavier maintenance, and other activities not transferred to the CONRAC facility. Additionally, because some of the existing rental car agencies are located in Inglewood, there would be an increase of hazardous materials within LAFD's jurisdiction. As such, operation of the proposed CONRAC would increase the HazMat and response requirements of Fire Station 95.

While Fire Station 95 serves as the HazMat responder within the Project area, it does not have enough HazMat personnel on-site to operate the HazMat company.[1] A HazMat Unit requires a staff of 12 members (4 members per 24-hour shift).[2] As such, HazMat cross-trained firefighters are drawn from nearby stations, such as Fire Stations 51 and 80, to support existing HazMat Unit operations out of Fire Station 95.[3] While the HazMat and response requirements of Fire Station 95 would increase to serve CONRAC operation, Fire Station 95 would continue to utilize cross-trained firefighters from Fire Stations 51 and 80 to support existing HazMat Unit operations.

The design of the CONRAC, including the CSB, Rental Car Ready/Return Parking Area, and Vehicle Storage Area would incorporate all required fire safety and design features in accordance with the LAFC. The proposed QTA would consist of two three-level buildings with an estimated total of 192 fueling positions. As originally proposed, operations inside the two QTA buildings would not meet the following NFPA 30A indoor fueling requirements identified in Table 4.11.1-2 of the Draft EIR:

- 7.3.6.5: The fuel dispensing area shall be located at street level, with no dispenser located more than 15 m (50 feet) from the vehicle exit to, or entrance from, the outside of the building.
- 7.3.6.6: The fuel dispensing area shall be limited to that required to serve not more than four vehicles at one time.

In February 2016, LAWA submitted a Request for Modification (RFM) of the LAFC to the LAFD to allow operation of the QTA and indoor fueling as proposed. Based on discussions with LAFD,[4] revisions were made to the February 2016 RFM and resubmitted to the LAFD on April 26, 2016, and is still in process. As noted in the April 26, 2016 revised RFM, the proposed Project would incorporate various design features, such as increased fire suppression features, extension of electrical hazard areas, installation of emergency warning lights, accessible fire control rooms, integrated drainage, and an increased number of emergency stop buttons and egress paths (i.e., emergency stairs). Additionally, the QTA buildings would be designed with open architecture to increase exhaust ventilation throughout the facilities. Double-walled steel piping would be constructed within the buildings to serve as a secondary containment in the event of a fire. Overall, the CONRAC design would include fire-resistant components that would provide a level of protection equal to or greater than specified by the LAFC. LAWA is working closely with the Los Angeles Department of Building and Safety (LADBS) to determine the appropriate building occupancy classifications for the CONRAC buildings, which would dictate any additional fire/life safety requirements. With the proposed features, the proposed Project would meet the regulatory intent of minimizing fire hazard risks, and impacts on fire protection services from indoor fueling operations in the CONRAC would be less than significant.

Operation of the CONRAC would not restrict emergency access, increase response times, extend station response distances, or decrease fire flow beyond the standards maintained by the agencies serving LAX and the surrounding communities. It would also not require the need for a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain adequate service levels. Therefore, operation of the CONRAC would have a less than significant impact on fire protection and emergency services.

Operational impacts of the proposed Project on fire protection services, including emergency response times, would be less than significant and no mitigation is required.

**Law Enforcement Emergency Response**

LAWAPD provides law enforcement services for LAX and other Airport properties outside the CTA. As indicated in Section 4.11.2.3.2 of the Draft EIR, LAWAPD is also supplemented by LAPD resources at LAX pursuant to a Memorandum of Agreement (MOA) between LAWA and LAPD. The LAWAPD facility is currently located outside the CTA at 6320 W. 96th Street, and the LAPD facility is located at 802 World Way (see Figure 4.11.2-1 of the Draft EIR). LAWAPD officers continuously patrol the Airport by foot, bicycle, and patrol cars. As noted on page 4.11-38 of the Draft EIR, LAWAPD is currently mandated by the Transportation Security Administration (TSA) to respond to all secured and screening areas within a maximum time of 5 minutes.

As discussed above and in Section 4.11.2.5 of the Draft EIR, construction of the proposed Project would include temporary and intermittent local roadway and/or lane closures throughout the Project site. Construction of the proposed Project and its roadway improvements would contribute to increases in traffic congestion through 2024, which would have the potential to hamper LAWAPD's or LAPD's emergency response activities. Therefore, as stated on page 4.11-42 of the Draft EIR, construction of the proposed Project could result in an increase in emergency response times beyond the limits required by applicable jurisdictions within the study area due to increased traffic congestion, changes in circulation, or the location of new land uses. Impacts would be significant.

To address these significant impacts on LAWAPD's and LAPD's emergency response activities during construction, LAWA has proposed Mitigation Measures MM-ST (LAMP)-1, Construction Traffic Project Task Force, MM-ST (LAMP)-2, Maintenance of Traffic, MM-ST (LAMP)-3, Worksite Traffic Control Plans, MM-ST (LAMP)-4, Roadway Closure Restrictions, and MM-ST (LAMP)-5, Traffic Maintenance During Construction (see Section 4.11.2.7 of the Draft EIR). As stated in Section 4.11.2.8 on page 4.11-46 of the Draft EIR, with implementation of these mitigation measures, the proposed Project's significant impacts on law enforcement services during construction would be reduced to a level that is less than significant, and less than cumulatively considerable, because these measures would facilitate effective coordination with LAWAPD and LAPD to meet their standards and requirements. Implementation of the Project Task Force would ensure the availability of emergency access and adequate response times during all construction phases.

Regarding operations-related impacts, as indicated on page 4.11-43, as a result of the increase of occupied area, the proposed Project could demand an increase in policing activities and vehicle-related incidents (e.g., auto thefts and auto break-ins). Additional law enforcement personnel may be required to patrol the areas particularly outside of the CTA, such as the West and East ITFs and CONRAC. The proposed Project would incorporate various planned security features, including but not limited to security fencing, surveillance cameras, security lighting, and emergency phones/call boxes, to reduce demand on LAWAPD and need for law enforcement response. Similar to impacts on LAFD response times, operation of the APM system, ITFs, CONRAC, and proposed roadway improvements would reduce traffic congestion and the demand

for curbfronts throughout the Project area. As noted on page 4.11-44 of the Draft EIR, the improved traffic flow associated with the proposed Project would improve response times for law enforcement over time.

As discussed on page 4.11-44 of the Draft EIR, while the proposed Project would contribute additional demand for law enforcement personnel, LAWA would continue its existing practice of working with LAWAPD and LAPD to routinely evaluate and provide additional officers, supporting administrative staff, and equipment, to keep pace with increases in activity associated with the proposed Project in order to maintain a high level of law enforcement services and acceptable emergency response times. This would be achieved through LAWA notification to LAWAPD and LAPD regarding pending development and construction and through LAWA review of status reports on law enforcement services at LAX.

As discussed on page 4.11-43 of the Draft EIR, LAWAPD has indicated that a satellite office within proximity to the CONRAC and ITF East may be desirable to maintain its ability to meet the mandated 5-minute maximum response time for areas east of S. Sepulveda Boulevard. At this time, LAWA has not included a satellite office in the proposed Project description; however, as noted on page 4.11-43, there is sufficient room in either the CONRAC or ITF East for a satellite office, if it is determined in the future, based on the ongoing consultation with LAWAPD and LAPD described above, that a satellite office should be provided in this area.

Based on the above, and as further discussed in Section 4.11.2.5 of the Draft EIR, operational impacts of the proposed Project on law enforcement service, including emergency response times, would be less than significant and no mitigation is required.

[1] Ulrich, Dean, Assistant Chief, LAWA Fire Operations Officer, Los Angeles Fire Department, Personal Communication, December 1, 2015.

[2] Ulrich, Dean, Assistant Chief, LAWA Fire Operations Officer, Los Angeles Fire Department, Personal Communication, December 1, 2015.

[3] Ulrich, Dean, Assistant Chief, LAWA Fire Operations Officer, Los Angeles Fire Department, Personal Communication, December 1, 2015.

[4] Email correspondence with Mr. Pat Tomcheck, Los Angeles World Airports, June 2, 2016.

**LAMP-PC00030-19**

**Comment:** 12. In Gateway's review of the DEIR, there appeared to be no analysis of impacts from **light pollution and noise pollution** related to the rooftop parking activity of both the ITF East and ITF West. Since both ITFs will be developed with open roof parking, there is the potential for these open parking areas on the roofs to measure the size of a football field, as hundreds of vehicles will be parked on an open floor of parking with no roof covering the top. The DEIR should have included an analysis of potential impacts from light from the cars parking on the ITF roof at night, as well as from car alarms going off. Without adequate mitigation measures, this could impact Gateway hotel patrons facing either ITF, due to the night-time illumination from the rooftop parkers' car headlights. If car alarms go off, this could affect Gateway office tenants during the day and Gateway hotel patrons at night. **Gateway requests** that the FEIR reflect an analysis of these issues and propose mitigation measures if appropriate.

**Response:** The following addresses potential impacts from light and noise associated with rooftop parking activity at the Intermodal Transportation Facility (ITF) East and ITF West.

**Lighting**

As described on page 4.1-87 in Section 4.1, Aesthetics, of the Draft EIR, sources of nighttime lighting include, but are not limited to, poles and fixtures along the APM guideway, building entrance and walkway illumination, building mounted fixtures, roof perimeter lights, security lighting, street lighting, landscape lighting features, and signage lighting. Other sources of nighttime lighting would be associated with ground transportation, including cars and other vehicles parking on ITF rooftops.

As discussed on page 4.1-67 of the Draft EIR, the nearest light-sensitive receptors to the Project site include the residential uses north of Westchester Parkway/W. Arbor Vitae, between S. Sepulveda Boulevard and Bellanca Avenue, and the hotel buildings along W. Century Boulevard and Airport Boulevard. Regarding light emissions from rooftop parking activity on the ITF East and ITF West parking garages at night, the sources of lighting associated with the ITFs would be typical of parking structures currently located within the Project area, with light emanating from the interior and rooftop parking decks equipped with parking lot lighting and other light standards. The closest hotel to the proposed ITF East is approximately 900 feet away and the closest hotel to the proposed ITF West is approximately 500 feet away. Given the distance between these parking structures and the nearest sensitive land uses, headlights from cars would not pose a significant impact.

As discussed on page 4.1-88 of the Draft EIR, all lighting associated with the proposed Project, including for the ITFs, would be shielded and directed downward to minimize light spillover from extending beyond the structures. The proposed Project would also utilize low-reflective materials to minimize any introduced sources of daytime or nighttime glare within the area. The incorporation of these design features would ensure that light spillover and adverse glare impacts from the proposed Project components on light-sensitive uses, including hotels along Century Boulevard, would be minimized. In addition, the proposed Project would comply with the LAX Design Guidelines, the Century Corridor Streetscape Plan, and the Westchester–Playa del Rey Community Plan, as well as with Los Angeles Municipal Code (LAMC) Section 93.0117 to ensure site lighting elements would not cast light in the night sky or adjacent properties, including nearby hotel properties. Adherence to these regulatory standards would reduce any light and glare impacts that may occur during operations of the proposed Project.

While new sources of lighting would be visible from nearby light-sensitive uses, the general character of the existing ambient light environment from these uses would not substantially change. The Project site is located in a heavily urbanized area that contains numerous lighting sources, including vehicle light emissions. Introduction of lighting sources associated with the ITF East and ITF West parking structures would not be out of character for the area and would be characteristic of a modern airport transportation area. Therefore, the proposed Project would not create a substantial new source of lighting associated with the rooftop parking activity of the ITF East and ITF West. Impacts of ITF rooftop lighting would therefore be less than significant and no mitigation is required.

**Noise**

Section 4.9.2 of the Draft EIR provides an evaluation of the operational road traffic noise associated with the proposed Project.

As shown on Table 4.9.2-3, of the Draft EIR (see page 4.9-17), the existing roadway noise levels within the Project Study area range from a low of 69.7 dBA to high of 76.2 dBA.

Implementation of the ITF East and ITF West would include the development of uncovered parking structures, ranging between 4- and 5-elevated parking levels (see Section 2.4.2 in Chapter 2, Description of the Proposed Project, of the Draft EIR).

Parking structures can be a source of noise nuisances due to activation of car alarms, as well as automobile engine start-ups and acceleration. Estimates of the maximum noise levels associated with parking lot activities are presented in Table 1, Maximum Noise Levels Generated by Parking Areas, and represent typical parking lot noise conditions based on numerous measurements conducted at other parking structures.[1]

**Table 1**

**Maximum Noise Levels Generated by Parking Areas**

| Parking Structure Event | Peak Noise Levels at 50 feet (dBA) |
|---|---|
| Door Slamming | 60 to 70 dBA |
| Car Alarms | 65 to 75 dBA |
| Engine Start Ups | 60 to 70 dBA |
| Tire Squeals | 50 to 70 dBA |
| Car Passbys | 55 to 70 dBA |

SOURCE: City of Burbank, *IKEA Retail Store Project Environmental Impact Report, p. 5.9-18, September 2013*.

The closest noise-sensitive receptor to the ITF West site is a hotel, Renaissance Hotel, located on the corner of W. 98th Street and Airport Boulevard approximately 500 feet southeast of the ITF West site. The closest noise-sensitive receptors to the ITF East site are hotels located along Century Boulevard, the closest of which (Hilton LAX) is approximately 900 feet southwest of the ITF East site.

The noise levels presented in Table 1 are for a distance of 50 feet from the source and are the maximum noise levels generated; a range is provided to reflect the variability of noise generated by various automobile types and driving styles. Based on the distance of the upper decks of the ITF parking structures to the nearest sensitive receptors (500 feet from ITF West and 150 feet from ITF East), the parking Leq noise levels at these sensitive receptors would be substantially diminished due to the distance in which the sound must travel. Specifically, the noise level attenuation (reduction) at a distance of 500 feet would be approximately 20 dB, based on a point-source noise attenuation rate of 6 dB per doubling of distance, and, the noise level attenuation (reduction) at a distance of 150 feet would be approximately 9 dB.

The Project site is located in a heavily urbanized area containing surface and structured parking uses, including, but not limited to, the 17 parking facilities associated with Gateway to LA that currently operate in the local area,[2] which generate sources of noise attributed to operating vehicles. These include existing airport parking facilities at or near the two aforementioned noise-sensitive receptors, such as the three-story parking structure with rooftop parking at the Renaissance Hotel, which offers airport public parking, and the Wally Park parking facility located approximately 150 feet northwest of the Travelodge Hotel LAX, which features a six-story parking structure with rooftop parking, located directly west of the proposed ITF East facility. Both of these existing parking facilities are associated with Gateway to LA. The peak noise levels generated by parking structure activities at the proposed ITFs would be consistent with the existing ambient noise levels for the Project site. This would include background noise such as activated car alarms and automobile engine start-ups and acceleration. Increases from vehicle-related noise emanating from the ITFs would not cause the ambient noise level measured at the property line of affected uses to increase by 3 dB(A) CNEL.

Therefore, the proposed Project would not create a substantial new source of noise associated with the rooftop parking activity of the ITF East and ITF West. Impacts would be less than significant and no mitigation is required.

[1] Measurements have been conducted by Meridian Consultants at a variety of locations, including the new IKEA site in Burbank, CA.

[2] Gateway to LA, Parking Location Map, Available: http://www.gatewaytola.org/index.cfm/maps/park/. (Last accessed on December 11, 2016)

**LAMP-PC00030-20**

**Comment:** 13. The DEIR reflects a mitigation measure called "**Construction Traffic Project Task Force**" or MM-ST (LAMP)-1, which states that LAWA will establish a Project Task Force specific to LAMP construction, to coordinate deliveries, monitor traffic conditions, advise motorists about detours and congested areas, and monitor and enforce delivery times and routes. **Gateway requests** that representatives from Gateway be included as members of this Project Task Force.

**Response:** Mitigation measure MM-ST (LAMP)-1, Construction Traffic Project Task Force, described on pages 4.12-238 through 4.12-240 in Section 4.12.3, Construction Surface Transportation, of the Draft EIR, discusses the construction coordination efforts that LAWA will undertake as part of the proposed Project. As stated in that mitigation measure, the Construction Traffic Project Task Force would work with residential and commercial neighbors regarding upcoming construction activities (see page 4.12-239 of the Draft EIR). As the Gateway BID represents a majority of the commercial neighbors, the Construction Traffic Project Task Force would coordinate with affected stakeholders on a regular and ongoing basis throughout construction of the LAX Landside Access Modernization Program.

**LAMP-PC00030-21**

**Comment:** 14. In Gateway's review of the DEIR, we found a lack of analysis concerning these possible impacts and corresponding mitigations, and request clarification or such analysis be discussed in the FEIR:

**Response:** Please see Responses to Comments LAMP-PC00030-22 through LAMP-PC00030-27 below regarding the adequacy of specific analyses in the LAX Landside Access Modernization Program Draft EIR.

**LAMP-PC00030-22**

**Comment:** a. Quantification of Vehicle Miles Travelled (VMT) on new street segments and on new or altered intersections, including "A" Street, "B" Street, "D" Street, Concourse Way extension and 98th Street extension. This lack of data in the DEIR makes it difficult to understand the potential impacts to Gateway owners and businesses in terms of traffic intensity and vehicular flow near their properties, and access or vehicular ingress/egress issues related to their properties.

**Response:** Section 4.2.1, Air Quality, of the Draft EIR includes quantification and analysis of Vehicle Miles Traveled (VMT) on all streets including those noted in the comment. However, VMT does not provide information on traffic intensity or vehicular flow on specific street segments. Detailed information on the traffic intensities and vehicular flows including intersection operations are all provided in the Appendix O of the Draft EIR, and summarized in Section 4.12.2 of the Draft EIR. Since all these streets are new streets with no existing baseline traffic, analysis of traffic impacts

on the new streets is not included in the Draft EIR. However, all these streets have been designed to accommodate the peak flows to and from the proposed Project facilities that they would serve.

**LAMP-PC00030-23**

**Comment:** b. The impact to existing properties along La Cienega Boulevard related to **new vehicular turn patterns** under LAMP that may affect Gateway property owners and businesses' ingress and egress along La Cienega Boulevard.

**Response:** Access and circulation to and from the existing properties would not be substantially affected by the proposed Project facilities and the associated roadway improvements. The analyses of impacts along La Cienega Boulevard intersections with the proposed Project under Existing, Future (2024) Phase 1, Future (2035) with Project Buildout, and Future (2035) with Project Buildout and Potential Future Related Development conditions with and without mitigation is provided in Sections 4.12.2.7 and 4.12.2.10 of the Draft EIR, respectively.

**LAMP-PC00030-24**

**Comment:** c. In terms of the "Potential Future Collateral Development" sites, the DEIR is silent about the development assumptions in terms of FAR or development intensity, making it difficult to understand the impacts to Gateway properties with the proposed development of the LAMP facilities **and** development of the "Potential Future Collateral Development" sites. For example, did the DEIR assume a certain Floor Area Ratio for the "Potential Future Collateral Development" sites or a particular land use?

**Response:** Development standards for the Potential Future Related Development, including Floor Area Ratios (FAR), are discussed in Section 11 of the proposed LAX Specific Plan revisions (see Draft EIR Appendix D, LAX Specific Plan Revisions, as revised in Chapter 3, Corrections and Additions to the Draft EIR). Land uses in the Potential Future Related Development areas, designated as new “Airport Landside Support Subarea”, would include all of the uses permitted in the C2 Zone, as specified in LAMC Section 12.14. The total floor area for all of the development within the Airport Landside Support Subarea shall not exceed 900,000 square feet, with a maximum allowable FAR of 2.0. The Draft EIR description of potential future related development in Chapter 2 and Appendix D was sufficiently detailed to allow programmatic impact analyses meeting CEQA requirements in Draft EIR Chapter 4.

**LAMP-PC00030-25**

**Comment:** d. Regarding: 1) the widening of 98th Street just east of Airport Boulevard; 2) the extension of 98th Street; the La Cienega/405 new ramp, no detailed design plans were provided in the DEIR.

**Response:** An EIR project description is not required to include detailed design plans. (See CEQA Guidelines § 15124.) The commentor is correct in that no detailed design drawings for W. 98th Street or the La Cienega/I-405 ramps were provided in the Draft EIR, as these details have not yet been developed by LAWA. LAWA will continue to coordinate with the Gateway to LA and their members as design teams are selected and design plans developed.

**LAMP-PC00030-26**

**Comment:** e. Gateway did not see a discussion in the DEIR related to remote passenger check-in and/or luggage check-in at the ITF or CONRAC facilities, and requests that the FEIR discuss whether these services will be included as part of LAMP implementation.

**Response:** As discussed on page 2-75 in Chapter 2, Description of the Proposed Project, of the Draft EIR, each ITF "would be designed to include airport amenities, which may include valet parking, waiting areas, commercial amenities such as dining and concession services, baggage check facilities, and ticketing/information kiosks to make these facilities attractive and convenient alternatives to the CTA. Some of these amenities may be available when the ITFs open, while other amenities such as baggage check-in facilities may not occur until future years and is subject to FAA and TSA approvals."

**LAMP-PC00030-27**

**Comment:** f. Related to the development of METRO's Airport Metro Connector (AMC rail station) there was no discussion analysis in the LAMP DEIR related to how LAWA, the LAPD, the LAWAPD and/or the LAFD will coordinate fire-life-safety-emergency response as well as response to transient/homeless issues between the various City and County agencies.

**Response:** Section 4.11, Public Services, of the Draft EIR provides an evaluation of the cumulative impacts on fire protection and law enforcement services from construction and operation of the proposed Project and other development projects at/adjacent to LAX, including Metro's AMC 96th Street Transit Station, which would be located adjacent to the proposed ITF East.

As noted in Sections 4.11.1.6 and 4.11.2.6 of the Draft EIR, Metro would implement its own safety program plans and system security plans to address the safety and security of transit commuter operations, mitigate accidents, and support compliance with state regulations. Metro would implement these safety program plans and system security plans with those fire protection and law enforcement agencies containing jurisdiction over its project.

The EIR for the AMC 96th Street Transit Station, which was certified by the Metro Board of Directors on December 1, 2016, identifies that the LAFD and the Los Angeles County Sheriff's Department (LASD) would provide fire protection and law enforcement services for the project.[1] Metro indicated in its Final EIR that a LASD security office is proposed to be located within the AMC 96th Street Transit Station.[2] While LASD contracts with Metro to provide law enforcement for Metro system facilities, LASD has a mutual aid agreement with the LAPD such that in a significant event which required immediate response by law enforcement, LAPD may be called upon to respond to emergencies at Metro facilities.

To clarify the cumulative impacts discussion found within Sections 4.11.1.6 and 4.11.2.6 of the Draft EIR, coordination of fire-life-safety-emergency responses would follow existing Mutual Aid Plans, which would cover the AMC 96th Street Transit Station (see page 4.11-13 of the Draft EIR). With regards to fire protection, LAFD would continue to provide fire protection services throughout the Project area, including the site proposed for the AMC 96th Street Transit Station, from Fire Stations 5, 51, 67, 80, and 95. With regards to law enforcement, LAWAPD would provide law enforcement services to the proposed Project and all its components, and would continue its existing practice of working with LAPD to ensure sufficient law enforcement service is provided throughout the Project area. Upon implementation of the two projects (LAX Landside Access Modernization Program and the AMC 96th Street Transit Station), LAWAPD, LAPD, LASD, and LAFD would coordinate to maximize the efficiency of available fire and law enforcement services between the projects.

Section 4.10.5.1.3, Displace Substantial Number of Existing People, of the Draft EIR notes that the existing homeless population would be relocated prior to the start of the Project (see page 4.10-31). As noted, this homeless population would likely be absorbed into the nearby surrounding communities. Page 4.10-31 of the Draft EIR further notes that the County and City of Los Angeles currently offer a variety of services and housing opportunities that would be available

to the homeless population affected by the proposed Project. In addition, organizations, such as LAHSA, would participate in the coordination of programs and funding to address homeless needs, such as providing available housing, emergency shelters, and other programs and services. As discussed on page 4.10-31 of the Draft EIR, LAWA would coordinate with the City of Los Angeles to ensure the homeless population is aware of the available services and programs. This interagency coordination would occur prior to the start of construction of the proposed Project. Please see Response to Comment LAMP-AL00002-7 for further discussion related to the homeless population that would be impacted by the proposed Project.

Regarding the AMC 96th Street Transit Station, Metro would be responsible for implementing similar efforts to address homeless displacement, if applicable. LAWA would coordinate its efforts, as necessary, with Metro to ensure that homeless and transient are aware of the services available from City and County agencies.

[1] Los Angeles County Metropolitan Transportation Authority (Metro), Airport Metro Connector 96th Street Transit Station Draft Environmental Impact Report, June 2016, pgs. 4-19 and 4-20, Available: https://www.metro.net/projects/lax-extension/.

[2] Los Angeles County Metropolitan Transportation Authority (Metro), Airport Metro Connector 96th Street Transit Station Final Environmental Impact Report, November 2016, p. 3-140, Available: https://www.metro.net/projects/lax-extension/.

**LAMP-PC00030-28**

**Comment:** We look forward to the above issues raised by Gateway to LA to be addressed in the FEIR in much greater detail, and where appropriate for additional mitigation measures to be recommended.

**Response:** Please see Responses to Comments LAMP-PC00030-1 through LAMP-PC00030-27 above.

## LAMP-PC00031 Cumming, William — Los Angeles International Airport Area Advisory Committee — 11/14/2016

**LAMP-PC00031-1**

**Comment:** The Los Angeles International Airport Area Advisory Committee (LAXAAC), a committee of residents of the communities surrounding Los Angeles International Airport (LAX), is submitting these comments on the Draft Environmental Impact Report for the Landside Access Modernization Program (LAMP).

Initially, we commend LAWA for its efforts with respect to the LAMP, which our Committee fully anticipates will substantially improve not only the passenger experience at LAX but also improve the ground traffic in the neighborhoods surrounding the airport. We look forward to the day when the improvements described are fully operational. Nonetheless, there are some issues which the DEIR does not address adequately, and must be resolved in the final EIR.

**Response:** Please see Responses to Comments LAMP-PC00031-2 through LAMP-PC00031-18 below regarding the adequacy of the LAX Landside Access Modernization Program Draft EIR.

**LAMP-PC00031-2**

**Comment:** The ITF, CONRAC and APM As neighbors of the airport, our Committee members are hopeful that these facilities would take a substantial amount of traffic off the side streets as well as from the Central Terminal Area (CTA). In order for that to happen, passengers must actually use these facilities.

With respect to baggage check-in, the DEIR says only that there may be baggage check-in at both the ITF and the Consolidated Rental Car Facility (CONRAC), but that such baggage check-in may not occur until some unspecified time in the future, subject to FAA and TSA approval (Section 2.4.2). Nonetheless, we would hope that LAWA would do everything in its power to implement such facilities as soon as possible and to have them be complimentary for passengers. We expect that free check-in of bags at these locations would significantly impact their level of use, particularly for people with mobility issues, as well as for large families with substantial amounts of luggage.

**Response:** The comment does not appear to be related to significant environmental issues to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) However, the Draft EIR reasonably assumes that the ITF, CONRAC, and APM would be used as described in in Chapter 2, Description of the Proposed Project, of the Draft EIR. As discussed in that chapter, each ITF "would be designed to include airport amenities, which may include valet parking, waiting areas, commercial amenities such as dining and concession services, baggage check facilities, and ticketing/information kiosks to make these facilities attractive and convenient alternatives to the CTA. Some of these amenities may be available when the ITFs open, while other amenities such as baggage check-in facilities may not occur until future years and is subject to FAA and TSA approvals." (see page 2-75). Whether free check-in of luggage would be feasible is uncertain and would depend on the economics of transporting the luggage from these remote facilities to the individual passenger terminals. Note that LAWA has no control over fees that airlines charge passengers to check luggage.

**LAMP-PC00031-3**

**Comment:** The DEIR's discussion of the amount of time it would take passengers on the Automated People Mover (APM) to travel from CONRAC (9 minutes) and the ITF (7.7 minutes) to the CTA, mentions the wait time between trains, which it estimates as only two minutes (Table 2.2), but does not discuss the time to access the APM from parking or drop-off points. We are concerned that the additional time necessary to do so will impact usage of the APM. If, for example, it takes substantially longer to access and ride the APM from the ITF than it would take to be driven to the terminal and dropped off there, the EIR should mandate methods by which LAX can encourage passengers to use these facilities rather than to continue to follow the current procedure of having someone drive them into the CTA for pickup and drop off. The discussion of "pricing strategies" (page 85) to encourage use of the ITF instead of the CTA appears vague and needs clarification.

**Response:** The comment does not appear to be related to significant environmental issues to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c).) Nevertheless, access times to the APM Stations from the CONRAC, ITF West, or ITF East parking structures would be similar to access times from CTA parking structures; passengers would need to find a space to park, then walk to the terminal. A proposed Project mitigation measure includes variable message signs indicating the time to drive into the CTA so passengers would understand the length of time they may sit in traffic to get to the terminals versus the time certain travel of utilizing the APM. This feature is included as part of Mitigation Measure MM-ST (LAMP)-8, Signal System Corridor Improvements – Closed Circuit TV (CCTV) Camera and Changeable Message Signs (CMS) Installation, on pages 4.12-181 and 4.12-182 in Section 4.12.2 of the Draft EIR.

Section 2.4.6, Transportation Policies at LAX, in Chapter 2, Description of the Proposed Project, of the Draft EIR describes the existing transportation policies at LAX and the policy changes that LAWA may establish at LAX. These could include changes to fees, pricing, licenses, traffic patterns, and agreements with various commercial vehicle operators at LAX, as well as fees and prices for parking at LAX facilities. Additionally, LAWA may implement tolls for commercial vehicle operators and potentially to the public to access Airport facilities if needed to manage traffic during peak periods and for incident management. The Draft EIR states, in Section 2.4.6.1, on page 2-144, that "[t]o reduce congestion on the CTA roadways, LAWA would update the LAX Ground Transportation Permit Program to allow and/or require commercial operators to pick-up and drop-off passengers at the ITF East and ITF West. Concurrently, LAWA would restrict access to the CTA for some commercial operators. LAWA would also institute pricing differential strategies to encourage commercial vehicle operators to pick-up and drop-off passengers at the ITF East and the ITF West."

Section 2.4.6.2 of the Draft EIR, also on page 2-144, states that, "[w]ith implementation of the proposed Project, changes to the LAX Ground Transportation Permit Program, and implementation of pricing differential strategies, LAWA would manage the Project facilities to induce future daily passenger mode share shifts, with most commercial vehicle operators picking-up and dropping-off passengers at the ITF East and ITF West. LAWA would manage the facilities and Airport traffic to effectuate a shift of up to approximately 49 percent of the Airport passenger pick-up and drop-off from the CTA to the ITF East, ITF West, and CONRAC." Additional language on traffic management at the ITF West (Section 2.4.6.2.1 of the Draft EIR) and ITF East (Section 2.4.6.2.2), describes the actions that LAWA may take to encourage use of these facilities and a shift in traffic from the CTA.

LAWA will be evaluating the appropriate actions and incentives to take to affect this shift in traffic to ensure that the investment LAWA is making in improving the landside access system at LAX is successful. LAWA recognizes that there are a number of ways that a shift in approximately 48 percent of vehicle traffic can be achieved; LAWA will continue to coordinate with the affected parties and will need to seek approval from the Board of Airport Commissioners to implement any changes to the existing transportation policies at LAX. However, at this juncture it is simply not feasible to provide the level of detail requested by the commentor. LAWA has based its analysis upon reasonable assumptions, however the type of fine tuning contemplated in the comment cannot be performed until the facilities are operational and real world conditions can be observed. The commentor also suggests that LAWA incorporate "mandate[s]" to avoid "someone drive them into the CTA for pickup and drop off." Please see Response to Comment LAMP-AL00006-5.

**LAMP-PC00031-4**

**Comment:** Although the DEIR considers alternatives for the APM, it does not discuss the possibility of constructing the APM so that it would be possible at a later date to construct an additional APM station should it be determined that the walkways to the various terminals are too long. We recommend that LAWA evaluate whether it is possible to construct the APM to allow for future additional stations.

**Response:** LAWA considered numerous operational characteristics during the planning of the APM system, including turning radii of proposed APM alignments, effect on APM operations and travel times, and traffic and pedestrian circulation, as well as walk distances. Due to the physical constraints of the CTA and the close proximity of the terminals, a spine alignment with APM stations located approximately equidistant between the north and south terminals best met LAWA's operational criteria for the system.

One of the APM alignments considered by LAWA was a loop alignment within the CTA, with multiple station stops either at each terminal or shared between terminals. Due to space constraints within the CTA, a loop alignment is not operationally feasible – the APM trains would not be able to physically make the turning radii required at the west end of the CTA in front of the Tom Bradley International Terminal. The evaluation of an APM loop alignment also determined that the terminals are too closely spaced to allow for adequate headways between terminals to have stations located at every terminal or between every terminal. A discussion of LAWA's evaluation of an APM loop alignment has been added to Section 5.4.1.1.1, as shown in Chapter 3, Corrections and Additions to the Draft EIR.

As LAWA proceeds through the design-build process, LAWA will work with the selected design-build team to identify the potential for design flexibility to meet unanticipated future needs. However, the proposed Project, as described in Chapter 2, Description of the Proposed Project, contains the Project elements identified by LAWA required to meet the Project's objectives (see Section 2.2, pages 2-6 through 2-8, of the Draft EIR).

**LAMP-PC00031-5**

**Comment:** It is our understanding that the Metro light rail station proposed at 96th Street and Aviation Boulevard will not offer a park-and-ride lot. For that reason, the final EIR should include mitigation measures to discourage daily rail commuters from parking at the CONRAC or ITF in order to avoid an adverse impact on the availability of parking spaces for LAX customers.

**Response:** LAWA is not aware of any plans by the Los Angeles County Metropolitan Transportation Authority (Metro) to provide parking at their proposed Airport Metro Connector 96th Street Transit Station. Both the Consolidated Rental Car Facility (CONRAC) and Intermodal Transportation Facility (ITF) East would be Airport facilities dedicated to the sole use of Airport passengers and employees.

Also, please note that parking impacts are generally not physical environmental impacts that must be addressed in CEQA documents. (See *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656.) Additionally, the proposed Project would increase the number of parking spaces above baseline conditions. (Draft EIR Sections 2.4.2.1.2, and 2.4.3.1; and page 4.12-153.) It is not the purpose of the LAX Landside Access Modernization Program Draft EIR to analyze impacts caused by other projects. "[E]ffects" and "impacts" under CEQA are defined as "direct or primary effects *which are caused by the project* and occur at the same time and place." (CEQA Guidelines Section 15358(a); See also *Walmart Stores, Inc v. City of Turlock* (2006) 138 Cal.App.4th 273 [Impacts need to have a "requisite causal link" to the project.]

**LAMP-PC00031-6**

**Comment:** In addition, although we commend the landscaping improvements planned for Sepulveda Boulevard, we anticipate that there will be additional numbers of passengers who will walk to and from LAX from Westchester on Sepulveda Boulevard. In order to make this area safer, LAWA should develop a mitigation plan for pedestrians for that street, with improvements in sidewalks, crosswalks and lighting.

**Response:** As discussed on pages 4.12-153 and 4.12-167 of the Draft EIR, impacts to bicycle and pedestrian facilities would be less than significant. As discussed on pages 4.12-153, the proposed Project consists of roadway and transportation improvements and construction of facilities that would facilitate movement of passengers at LAX; the proposed Project would not generate any additional new trips. The proposed Project would provide additional pedestrian facilities, bike paths and bike facilities for utilization by visitors and employees. As indicated in Section 2.2 of

the Draft EIR, one of the inherent objectives of the proposed Project is to provide and enhance new access options for all modes of travel. It is not the purpose of an EIR to fix or mitigate existing environmental issues, as suggested in the comment. (CEQA Guidelines Section 15126.2(a); *Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1094 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"].

Nevertheless, please note that Appendix B, LAX Design Guidelines, of the Draft EIR contains LAWA's comprehensive vision for the passenger experience at LAX. Page 1-2 of the LAX Design Guidelines states that the Design Guidelines apply to LAWA projects, including Land[side] Access Modernization Program (LAMP) projects, terminal improvements in the Central Terminal Area (CTA), and CTA parking structures.

The overall purpose of the Design Guidelines is to provide a framework to enhance the visual quality of the environment in and around LAX in a way that is consistent with airport needs and existing area conditions. The Design Guidelines encourage the development of more sustainable and user friendly spaces with a focus on unified, high quality architecture and urban design, and a seamless interaction between a variety of users such as pedestrians, cyclists, transit riders, and automobile drivers with an emphasis on the passenger experience.

Chapter 3 of the LAX Design Guidelines contains LAWA's guidelines for streetscape, landscape, and the public realm, including roadway/streetscape elements such as crosswalks, landscaping, and lighting. As LAWA implements improvements associated with the LAX Landside Access Modernization Program to Sepulveda Boulevard, these design guidelines will be implemented.

**LAMP-PC00031-7**

**Comment:** Although the DEIR discusses cell phone waiting lots as a measure to encourage use of the ITF and CONRAC, there is no discussion of where such lots will be located. The current cell phone waiting lot has not been well used, due either to its location or the lack of publicity about it. Other parking lots (i.e., Ralphs/CVS) and side streets such as West 92nd Street currently serve as *de facto* cell phone waiting lots, creating inconvenience for neighborhood residents.

**Response:** Page 2-145 in Chapter 2, Description of the Proposed Project, of the Draft EIR identifies that cell phone waiting areas may be included in both the Intermodal Transportation Facility (ITF) West (see Section 2.4.6.2.1) and/or the ITF East (see Section 2.4.6.2.2).

**LAMP-PC00031-8**

**Comment:** Traffic
We are concerned that the traffic analysis underestimates the future traffic volume in the communities surrounding the airport, as well as the negative impacts of such volume on those communities. All the traffic volume forecasts for 2024 must be re-evaluated when LAMP's Phase 1 has been completed so that accurate traffic volume statistics are reviewed prior to any Phase 2 approvals.

**Response:** This comment is practically identical to comment LAMP-AL00002-13; please refer to Response to Comment LAMP-AL00002-13. Please see Response to Comment LAMP-AL00002-13 regarding the travel demand forecasting model developed for the proposed Project.

**LAMP-PC00031-9**

**Comment:** We are concerned that traffic headed to the ITF and CONRAC will create traffic jams for northbound traffic on Aviation and La Cienega Boulevards and westbound traffic on Century Boulevard and Arbor Vitae Street. The DEIR does not fully discuss whether traffic headed for these facilities could be routed onto dedicated side streets which feed directly into them. Even with such mitigation, Aviation and Century Boulevards are likely to see greatly increased congestion, so we recommend that the DEIR implement staggered traffic lights and other mitigation measures on those streets. To avoid further cut-through traffic in the surrounding communities, the plan should not add any new streets that would permit further LAX access from the north.

**Response:** The off-Airport traffic study results presented in Section 4.12.2 of the Draft EIR fully analyzed the intersections along Aviation, Century, and La Cienega Boulevards, as well as Arbor Vitae Street. Without mitigation, the following intersections would be significantly impacted in 2024 (see page 4.12-111 of the Draft EIR and Table 4.12.2-18 on pages 4.12-113 to 4.12-118 of the Draft EIR):

- Airport Boulevard and Century Boulevard. Significant impact in the p.m. peak hour at LOS D
- Aviation Boulevard and Arbor Vitae Street. Significant impact in the p.m. peak hour at LOS D
- La Cienega Boulevard and Florence Avenue. Significant impact in the p.m. peak hour at LOS F
- La Cienega Boulevard and Arbor Vitae Street. Significant impact in the a.m. peak hour at LOS F
- La Cienega Boulevard and Century Boulevard. Significant impact in the a.m. peak hour at LOS E and in the p.m. peak hour at LOS F
- Inglewood Avenue and Century Boulevard. Significant impact in the p.m. peak hour at LOS F
- Airport Boulevard and Century Boulevard. Significant impact in MD Peak Hour at LOS D
- Aviation Boulevard and Arbor Vitae Street. Significant impact in MD Peak Hour at LOS C

Without mitigation, the following intersections would be significantly impacted in 2035 (see page 4.12-123 and 4.12-131 of the Draft EIR and Table 4.12.2-20 on page 4.12-125 to 4.12-130 of the Draft EIR):

- Sepulveda Boulevard and Century Boulevard. Significant impact in the a.m. peak hour at LOS E
- Aviation Boulevard and Arbor Vitae Street. Significant impact in the p.m. peak hour at LOS F
- I-105 Freeway Ramps (east of Aviation Boulevard) and Imperial Highway. Significant impact in the p.m. peak hour at LOS C
- La Cienega Boulevard and Florence Avenue. Significant impact in the p.m. peak hour at LOS F
- La Cienega Boulevard and Manchester Boulevard. Significant impact in the p.m. peak hour at LOS F
- La Cienega Boulevard and Arbor Vitae Street. Significant impact in the a.m. peak hour at LOS F and in the p.m. peak hour at LOS F
- La Cienega Boulevard and Century Boulevard. Significant impact in the a.m. peak hour at LOS F and in the p.m. peak hour at LOS F

- Inglewood Avenue and Century Boulevard. Significant impact in the p.m. peak hour at LOS F
- Sepulveda Boulevard and Century Boulevard. Significant impact in MD Peak Hour at LOS D
- Aviation Boulevard and Arbor Vitae Street. Significant impact in MD Peak Hour at LOS C
- La Cienega Boulevard and Manchester Boulevard. Significant impact in MD Peak Hour at LOS F
- La Cienega Boulevard and Century Boulevard. Significant impact in MD Peak Hour at LOS D

With the mitigation identified in Section 4.12.2.9 of the Draft EIR, the proposed measures would mitigate all Project-related intersection impacts under the 2024 With Project scenario to less than significant levels (see Table 4.12.2-37 of the Draft EIR). Under 2035 With Project conditions, the proposed measures would reduce all Project-related intersection impacts to less than significant except for the intersection of La Cienega Boulevard and Arbor Vitae Street (see Table 4.12.2-38 of the Draft EIR). No feasible further mitigation measures are available to reduce this impact to a less than significant level that are in LAWA's control. Right-of-way within the City of Inglewood would be required to further reduce the impact at this intersection.

Also, as noted in Section 2.4.4 of the Draft EIR, the proposed Project includes the following improvements to the roadways specifically noted in the comment:

- An additional fifth eastbound travel lane along Century Boulevard between Avion Drive and Aviation Boulevard
- An additional lane in either direction along Aviation Boulevard between 98th Street and Arbor Vitae Street
- An additional southbound lane along La Cienega Boulevard between Arbor Vitae Street and 98th Street
- An additional lane in either direction along Arbor Vitae Street between La Cienega Boulevard and the Metro Crenshaw/LAX Line at-grade crossing; an additional lane in the westbound direction along Arbor Vitae Street between the Metro Crenshaw/LAX Line at-grade crossing and Airport Boulevard.

These improvements, along with consolidation of facilities with access directly off of the I-405 Freeway as well as these improved arterials, are designed to minimize cut-through traffic and neighborhood traffic intrusion and would improve traffic conditions. See Section 4.12.2.7 of the Draft EIR for a summary of the improved traffic conditions. For details, see Tables 24A 24B, 25, 26A, 26B, 27, 28A, 28B, and 29 on pages 208 - 237 of Appendix O, Off-Airport Traffic Study, of the Draft EIR, and on Figures 43A and 43B (pages 270 and 271), Figures 48A and 48B (pages 279 and 280), Figures 53A and 53B (pages 288 and 289). And Figures 58A and 58B (pages 297 and 298) of Appendix O, Off-Airport Traffic Study, of the Draft EIR. Also, please see pages 8 - 10 of Appendix O, Off-Airport Traffic Study, of the Draft EIR for a discussion of the number of intersections that would realize improved conditions compared to Without Project conditions.

The Draft EIR made reasonable assumptions regarding trip distribution, as discussed in Section 4.12.2.2.3. More detailed information was also included in Draft EIR Appendix O as well as Appendix D to Appendix O. See also Responses to Comments LAMP-AL00002-12 and LAMP-AL00002-13 regarding the traffic modeling performed as part of the Draft EIR analysis. The traffic model assigns traffic based on a minimum time path algorithm and therefore the assignment of trips along the freeway system or the arterial street system reflects the level of congestion predicted to occur along a trip's alternative routes to/from their destinations. The model does not ""underassign" trips to one segment of the roadway system (freeway vs. arterial), but rather

assigns trips to the system based on the travel times that result from the predicted future levels of congestion.

**LAMP-PC00031-10**

**Comment:** In addition, funding for construction of the mitigation measures for the area freeways is not identified. In the event that LAWA is not permitted by law to fund these mitigation measures itself, funding from state agencies including Cal Trans and from surrounding cities must be specified. The new dedicated off-ramps from Interstate 405 are very important to the use of the ITF and CONRAC, and therefore, the funding of such improvements needs to be clarified. Can LAWA fund such improvements, or must other entities, such as the California Highway Department, participate? If so, to what extent is their participation expected? It would be pointless to identify mitigation measures that cannot be funded.

**Response:** Please see Responses to Comments LAMP-AL00002-5 and LAMP-AL00002-14 regarding LAWA's fair-share contribution to the funding of improvements to address significant freeway impacts. The Draft EIR documents the effectiveness of each of the fair share improvements in reducing significant traffic impacts, and LAWA has committed to paying its fair share of these improvements. Also, please note that some freeway improvements, such as the improvements to the I-405 La Cienega ramps north of Century Boulevard and the I-105 ramps at Aviation and Imperial Boulevards are part of the proposed Project, and as such would be funded by LAWA as a Project cost.

**LAMP-PC00031-11**

**Comment:** In addition, there is no reason to delay the implementation of those traffic mitigation measures that pertain to traffic generated by LAX employees and contractors. They should be implemented as soon as possible.

**Response:** LAWA is proud of its efforts to reduce employee trips to LAX through its existing rideshare, vanpool, and FlyAway programs. As the commentor notes, LAWA is proposing as part of the LAX Landside Access Modernization Program, to implement a Transportation Demand Management (TDM) Program, identified as Mitigation Measure MM-ST (LAMP)-6 on pages 4.12-179 and 4.12-180 in Section 4.12.2.9.1 of the Draft EIR, which would widen the scope of its trip reduction efforts and offer employees more choices on how to get to and from work. LAWA is examining ways to implement a TDM Program soon after project approval.

The Draft EIR's construction traffic mitigation measures would be implemented in time to mitigate significant construction traffic impacts. LAWA is examining ways to implement a TDM Program early in the project stages.

As noted in Section 4.12.3, Construction Surface Transportation, of the Draft EIR, construction shifts are timed so that construction employees are on the job-site prior to the start of the a.m. peak hour (7:00 a.m. to 8:00 a.m.) and have departed the job-site prior to the start of the p.m. peak hour (4:00 p.m. to 5:00 p.m.). See Section 4.12.2.2.5, page 4.12-209 of the Draft EIR. Additionally, LAWA enforces designated truck delivery hours and designated truck routes to minimize the effect of construction traffic on the surrounding communities. See Mitigation Measure MM-ST (LAMP)-1 on page 4.12-238 in Section 4.12.3.8 of the Draft EIR.

**LAMP-PC00031-12**

**Comment:** Construction Impacts

As neighbors of LAX, our committee members will be greatly impacted by the long-term construction that the LAMP will necessitate, and which the DEIR finds are "significant and unavoidable." We are pleased that the DEIR includes methods and procedures to ensure strict enforcement of all directives for controlling air pollution, noise, dust, hours of operation, construction workers' parking and transportation, truck hauling routes, equipment and materials staging and storing areas, and disturbance to neighboring communities. Please ensure that the construction permits provide for strict enforcement to mitigate the problem of fugitive dust and particulate matter spreading into nearby residential areas from construction sites.

**Response:** Please see Response to Comment LAMP-PC00021-11 which describes the Project Task Force that would be established to develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction of the proposed Project.

As discussed on pages 4.2-7, 4.2-9, 4.2-23, and 4.2-33 in Section 4.2.1, Air Quality, of the Draft EIR, the proposed Project would comply with South Coast Air Quality Management District Rule 403, Fugitive Dust, to control construction generated fugitive dust emissions. In addition, Standard Control Measure (Mitigation Measure) LAX-AQ-1, Construction-Related Air Quality Control Measures, on pages 4.2-53 through 4.2-56 of the Draft EIR contains numerous measures to reduce fugitive dust emissions during construction (see Measures 1a, 1b, 1c, and 1f). Implementation of these measures and compliance with SCAQMD Rule 403 are effective approaches to reducing Project-related fugitive dust emissions.

Regarding enforcement of fugitive dust control measures, “Project Requirements” (PRs) specific to each construction project at LAX, which are a required element of the construction contract for the Project, would include the integration of environmental mitigation requirements set forth in the Mitigation Monitoring and Reporting Program (MMRP) to be adopted for the proposed Project. Those requirements would include, but not be limited to, mitigation measures related to the control of fugitive dust emissions. Compliance with such mitigation requirements would be monitored by full-time staff and enforced through LAWA construction contract compliance requirements, as administered primarily by LAWA’s Inspection Division in coordination with the LAWA project manager and construction manager assigned to each project, as well as LAWA senior management when necessary.

**LAMP-PC00031-13**

**Comment:** We do not see in the DEIR any discussion of the impacts to all the surrounding communities caused by the reduction of CTA passenger parking during construction. We fully expect that passengers will increase their parking on residential streets during this construction, and the EIR should mandate mitigation measures to minimize that.

**Response:** As part of the Project, a public parking study was performed to estimate the required number of public parking spaces needed to facilitate future demand. It was concluded that adequate capacity would be provided via on-Airport and private public parking facilities throughout the duration of the Project. Additionally, adequate way-finding and signage would be provided to direct passengers to all available parking facilities. Also, as shown in Table 2-15 of the Draft EIR, LAWA would try and open the western half of the West ITF parking garage before demolition/reconstruction of Parking Garage P2A. Parking Garage P2B would not be closed until Parking Garage P2A has re-opened; similarly, Parking Garage P5 would not be closed until

Parking Garage P2B has re-opened. LAWA will strive to keep open at least the number of existing public parking spaces that exists today.

Also, please note that parking impacts are generally not physical environmental impacts that must be addressed in CEQA documents. (See *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656.)

**LAMP-PC00031-14**

**Comment:** In addition, Imperial Highway is currently serving as a main hauling route during construction, and is in dire need of improvement. The EIR must include mitigation measures to improve and maintain this important thoroughfare both during and after construction, and must identify funds for such work.

**Response:** This comment is similar to comment LAMP-PC00021-8; please see Response to Comment LAMP-PC00021-8.

**LAMP-PC00031-15**

**Comment:** We also are concerned about the 80 homeless individuals who the DEIR states are living in the Belford and Manchester Square areas who would "likely be absorbed into the nearby surrounding communities" (4.10.3.2.2), and the inadequate proposals which the DEIR suggests will shelter such people. Displacement of such people is not a "less than significant" impact (page 1072), and merely coordinating with other government agencies is inadequate. The final EIR should specify that LAWA assist financially with the construction of replacement housing for such people.

**Response:** The content of this comment is similar to comment LAMP-AL00002-7; please refer to Response to Comment LAMP-AL00002-7.

**LAMP-PC00031-16**

**Comment:** Finally, we hope that LAWA would implement a plan to communicate with the surrounding communities regarding construction impacts using both traditional and social media outlets.

**Response:** Please see Response to Comment LAMP-PC00021-11 which describes the Project Task Force that would be established to develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction of the proposed Project.

**LAMP-PC00031-17**

**Comment:** Other Issues

The DEIR envisions the addition of 10 million square feet of airport facilities, yet the DEIR does not discuss the obvious need for additional police and fire department resources to serve such new facilities.

**Response:** The content of this comment is similar to comments LAMP-PC00030-16, LAMP-PC00030-17, and LAMP-PC00030-18; please refer to Responses to Comments LAMP-PC00030-16, LAMP-PC00030-17, and LAMP-PC00030-18.

**LAMP-PC00031-18**

**Comment:** The relocation of the USO facility to the Theme building (Section 2.5.3) would not be easily accessible to service members because they will need to go to unsecured areas to access the USO facility. As it currently stands, many service members do not use the USO facility because it is too inconvenient for them to leave the secured area of their terminals for the USO facility. We do not see the proposal as an improvement, and recommend that the EIR propose moving the USO facility into a secured location accessible to all terminals.

**Response:** The comment does not appear to be related to significant environmental issues to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c). However, as the commentor notes, the USO is currently located in a non-secure area of the Airport. Providing the USO in a central location of the Airport is preferable to one located in the secure area of a terminal, since the terminals are not all connected. There is currently no way to walk from Terminal 1 to Terminal 8 after going through TSA screening; service members in one terminal would have to exit security and then go back through security to access the USO. Additionally, the Theme Building is located almost in the exact middle of the Airport, providing good access from any terminal; no terminal could provide the same convenience for all service members. LAWA has negotiated with the USO for a new location for their facility and is in the process of executing an agreement for the USO to relocate into the ground floor of the Theme Building, which is in close proximity to the current location of the USO.

**LAMP-PC00031-19**

**Comment:** In conclusion, we again compliment LAWA on focusing its efforts on improving the passenger experience at LAX and we look forward to the implementation of these plans. Please let us know if you have any questions regarding our views on the DEIR.

**Response:** The comment is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the LAX Landside Access Modernization Program.

## LAMP-PC00032 Schneider, Denny Alliance for a Regional Solution to Airport Congestion 11/15/2016

**LAMP-PC00032-1**

**Comment:** ARSAC has had no interest in filing suit against the Landside Access Modernization Project (LAMP). We then formally agreed in our 2016 Memorandum of Understanding with Los Angeles World Airports (LAWA) and the City of Los Angeles (MOU) that ARSAC will not file suit over the draft Environmental Impact Report (EIR) or aspects of this project. Pursuant to our rights under the MOU, we submit these comments to the LAMP DEIR.

ARSAC has participated in several briefings from LAWA and voiced concern over some aspects of this project but, in the totality, supports reduction of traffic in surrounding communities and Central Terminal Area (CTA) traffic via development of improved multimodal access into LAX and establishment of an effective network of regional airports. The following topics of concern are provided in accordance with the MOU to document our concerns and comments so that we may ultimately achieve the best possible project result.

**Response:** Please see Responses to Comments LAMP-PC00032-2 through LAMP-PC00032-25 below regarding the concerns of the commentor on the LAX Landside Access Modernization Program Draft EIR.

**LAMP-PC00032-2**

**Comment:** Controlling Document Policy Changes

- Reverse the changes made during the previous Master Plan effort that modified the City General Plan to instruct constituents of the Westchester Playa Del Rey Plan to discover details of the LAX Plan and LAWA Plans from LAWA which would have precedence over their community rather than for LAWA to understand the existing WPDR Plan and to coordinate or plan accordingly.

**Response:** The comment, as written, is unclear and does not appear to be related to significant environmental issues to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c). However, the modifications proposed to the Westchester-Playa del Rey Community Plan as part of the LAX Landside Access Modernization Program are described in Section 2.8.1.2 of Chapter 2, Description of the Proposed Project, of the Draft EIR. These changes consist solely of boundary modifications to reflect property that LAWA would purchase as part of the LAX Landside Access Modernization Program, or would remove from the LAX Plan.

The changes proposed to the LAX Plan are described in Section 2.8.1.1 of Chapter 2, Description of the Proposed Project; Chapter 7, Evaluation of Amendments to the LAX Plan and the LAX Specific Plan; and Appendix C of the Draft EIR. These changes include updating the Vision for LAX; updating the goals and objectives to reflect the proposed Project; adding a description of a new Airport Landside Support Area; updating policies to reflect the proposed Project and other programs; and removing text regarding projects that are no longer relevant. These proposed changes to the plans would not affect how the plans work or how LAWA coordinates with the surrounding communities.

**LAMP-PC00032-3**

**Comment:** - Removal of regional cooperation requirement should not be done. The EIR Goals and Objectives (P.7-2) fails to recognize that removal of regionalization statements eliminates the requirement to consider context within all network of airports instead of the narrower focus on only LAX.

**Response:** The comment does not appear to be related to significant environmental issues to which CEQA requires LAWA to respond. (CEQA Guidelines § 15088(c). However, the LAX Plan is the City's community plan for the LAX area; it is not a regional plan. As stated on page 7-2 in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, the ground access goal would be revised to focus on LAX, the only airport to which the LAX Plan is applicable, rather than referencing improvements at other regional airports. The proper planning document to discuss regionalization is the Southern California Association of Governments' Regional Transportation Plan[1], which does discuss regionalization issues associated with the Southern California commercial airports. SCAG has discussed putting an airport regionalization committee together to discuss these issues, and LAWA has agreed to participate on this committee.

[1] Southern California Association of Governments, Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility,

Accessibility, Sustainability and a High Quality of Life, Adopted April 7, 2016, Available: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

**LAMP-PC00032-4**

**Comment:** - Removal of reference to the "Fly Away" Program, an on-going successful program, should not be removed.

**Response:** As noted on page 7-2 in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, LAWA intends to fulfill its obligations to the FlyAway program pursuant to previously adopted mitigation for other LAX projects, and removing references to the FlyAway program in the LAX Plan would provide LAWA increased long-term flexibility to reduce airport trips by the most effective and efficient means available. Additionally, LAWA is proposing to modify the LAX Plan to include a goal to relieve congestion in the Central Terminal Area (CTA) and on the surrounding street system by developing a flexible transportation system that provides alternative travel options. LAWA has no intention of discontinuing the successful FlyAway routes; it just does not believe that the LAX Plan should specify an exact number of FlyAway routes when other options are available that may be more effective at reducing traffic congestion.

**LAMP-PC00032-5**

**Comment:** - The new Appendix A is to provide for Monitoring and Reporting annually, but eliminates some requirements for mitigation efforts. This change is in conjunction with elimination of Specific Plan requirements because "LAWA does not intend to initiate any new LAX Master Plan projects." This "no new projects" could be changed after these requirements are removed. LAWA currently, in good faith, intends to provide regular reporting of impacts but new management could change this if the requirement is removed.

**Response:** As noted on pages 7-6 and 7-7 in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, LAWA is proposing changes to Section 7, LAX Specific Plan Compliance Review, of the LAX Specific Plan. Revisions to this section would include the removal of subsection G, Monitoring and Reporting, and subsection H, Additional Study Requirements. Portions of these requirements would be consolidated into proposed Appendix A, as discussed below. Requirements regarding the preparation of a Specific Plan Amendment Study would be removed from the LAX Specific Plan as the LAX Landside Access Modernization Program EIR fulfills that requirement as described in Section 2.8.2 of the Draft EIR.

As noted on page 7-9 in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, a new Appendix A, Monitoring and Reporting, would be included to provide additional guidance on monitoring and reporting for LAX projects. Under this revision, LAWA would be required to prepare and submit annual reports regarding traffic generation, aviation activity analyses, and mitigation monitoring and reporting. These reports are currently required under Section 7.G of the LAX Specific Plan; however, the reporting requirements are specific to LAX Master Plan projects. As LAWA does not intend to initiate any new LAX Master Plan projects, this revision would make these reporting requirements standard practice for all projects.

Note that the requirement to provide regular reporting of impacts would still be contained in the LAX Specific Plan; it would just be moved to an appendix, consistent with how other specific plans in the City of Los Angeles are written.

**LAMP-PC00032-6**

**Comment:** - P7-10 (section 7.3) removes language regarding off airport parking, number of gates, and flyaways. It should instead include the ARSAC-LAWA MOU requirements.

**Response:** The commentor requests that unspecified requirements contained in a separate Memorandum of Understanding between LAWA and ARSAC should be included in the LAX Plan and/or the LAX Specific Plan. The LAX Specific Plan establishes the development standards consistent with the LAX Plan for the Airport and surrounding area. It is the principal mechanism by which the goals and objectives of the LAX Plan are achieved and the policies and principles are implemented. There is no requirement in the MOU that any of its provisions be incorporated into the LAX Plan or the LAX Specific Plan.

**LAMP-PC00032-7**

**Comment:** - P7-11 (section 7.3.2) references some of the mitigation requirements but not all. All mitigations should be included.

**Response:** The discussion in Section 7.3.2 of the Draft EIR mentions several mitigation measures that would supplement LAWA's existing FlyAway service and reduce traffic-related air quality impacts and congestion in the LAX Central Terminal Area. Complete listings of all proposed mitigation measures for air quality and traffic impacts are provided in Sections 4.2.1, Air Quality, and 4.12, Transportation/Traffic, of the Draft EIR, respectively. These measures will be replicated in the Mitigation Monitoring and Reporting Plan (MMRP)[1] for the LAX Landside Access Modernization Program Project. A complete listing of these mitigation measures does not need to be included in Section 7.3.2.

[1] Pursuant to Public Resources Code Section 21081.6(a), LAWA would adopt an MMRP in connection with the approval of the LAX Landside Access Modernization Program Project. The MMRP would define what agency is responsible for each adopted mitigation measure, when that measure would be implemented, and what criteria would be used to determine whether the measure is being implemented and is effective. The MMRP is a means to ensure compliance with mitigation measures during Project implementation.

**LAMP-PC00032-8**

**Comment:** It also refers to air pollution reviews that should be based on actual data in subsequent years, not an assumed amount with no increase.

**Response:** The comment refers to a discussion on the FlyAway program contained on page 7-11 in Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR. In particular, the Draft EIR states, "The proposed Project includes mitigation that would supplement the existing FlyAway service, including Standard Control Measure (Mitigation Measure) LAX-AQ-2, Transportation-Related Air Quality Control Measures (see Section 4.2.1, Air Quality), as well as the Travel Demand Management (TDM) Program (see Mitigation Measure MM-ST (LAMP)-6 in Section 4.12.2.9.1) thus, air pollutant emissions are not anticipated to increase."

The air quality impact analysis is presented in Section 4.2.1, Air Quality, of the Draft EIR. As shown in Table 4.2.1-10 (page 4.2-37) and Table 4.2.1-11 (page 4.2-38) of the Draft EIR, regional air pollutant emissions are anticipated to decrease with implementation of the proposed Project before mitigation is implemented. Table 4.2.1-30 on page 4.2-62 of the Draft EIR identifies the mitigated operational emissions in 2035, which are all less than the 2035 Without Project

condition. These emission calculations do not include incorporation of Mitigation Measure MM-ST (LAMP)-6.

As stated in Response to Comment LAMP-PC00032-4, LAWA is not eliminating the FlyAway service. LAWA recognizes the need to provide options to LAX passengers and employees on how to access the Airport and to reduce congestion and air pollutant emissions. It has replaced the goals specifically referring to the FlyAway service with a broader goal to relieve congestion in the CTA and on the surrounding street system by developing a flexible transportation system that provides travel options to passengers, Airport employees, and Airport-related vendors. LAWA also added a goal to provide new access options including a direct connection to transit. These goals fulfill the same purpose as the goals referencing the FlyAway service; however, they provide LAWA more flexibility in achieving these goals rather than focusing solely on the FlyAway service.

**LAMP-PC00032-9**

**Comment:** Further, LAWA should be documenting PM 0.1 micron particle size as well as the "required" sizes. It is well documented that the smaller particles are more dangerous to breathe and that the correlation with larger sizes does not exist. This additional data should be required to create history until CARB or other agencies determines acceptable levels and the make up of particles.

**Response:** The commentor requests that LAWA document $PM_{0.1}$ particle sizes as well as "required" sizes (i.e., $PM_{10}$ and $PM_{2.5}$), until acceptable ambient levels of these particles can be developed by regulatory agencies. Particles that fall in the 0.1 micrometer size fraction are typically referred to as ultrafine particles (UFP). No federal or state ambient air quality standards have been set for PM 0.1. The Draft EIR Air Quality discussion discusses $PM_{10}$ and $PM_{2.5}$, which are inclusive of smaller diameter particles, including ultrafine particles. As noted in Section 4.2.1.1 of the Draft EIR "Six criteria pollutants were evaluated for the proposed Project… and fine particulate matter or particulate matter with an aerodynamic diameter *less than or equal to 2.5 micrometers* ($PM_{2.5}$)." (Emphasis added.) $PM_{2.5}$ includes 'particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometer,' which includes ultrafine/black carbon particles.

Similar arguments were also recently raised and rejected by the Court of Appeal in *No Wetlands Landfill Expansion v. County of Marin* (December 2015, 1st App. Dist. Case No. A137459):

> "Particulate matter may be measured in microns (a micron is one one-millionth of a meter, a micrometer). (Id. at pp. 1231-1232.) Particulate matter made up of particles that are 10 micrometers or less in diameter (PM-10) is considered an air pollutant. (Ibid.; 40 C.F.R. § 50.6(c) (2014).) PM- 10 "can be further subclassified into fine particles, which are 2.5 micrometers or less in diameter" (PM-2.5). (California Unions, at p. 1232; 40 C.F.R. §§ 50.7, 50, appen. L (2014).) The federal Clean Air Act requires the Environmental Protection Agency to prescribe national ambient air-quality standards. (42 U.S.C. § 7409(a), (b).) Separate standards for PM-10 and PM-2.5 have been established (40 C.F.R §§ 50.5(a), 50.7), and areas that fail to meet those standards are designated as nonattainment areas. (42 U.S.C. § 7407(d).) Although the EIR here identified national standards for both types of particulate matter, it did not separately assess the significance of PM-2.5 and PM-10. Instead, it explained that PM-10 includes PM-2.5, and it analyzed only PM-10, explaining that all PM-2.5 was also PM-10. [¶] This approach of analyzing PM-10, without separately analyzing PM-2.5, was consistent with CEQA guidelines prepared in 1999 by the Bay Area Air Quality Management District (BAAQMD), which regulates air quality in the area and at the landfill. BAAQMD "is the agency primarily responsible for assuring that national and State ambient air quality standards are attained and maintained in the San Francisco Bay Area." Its

> responsibilities include adopting and enforcing rules and regulations concerning air-pollutant sources and monitoring ambient air-quality conditions. Its 1999 CEQA guidelines for preparing EIRs provided threshold significance levels for PM-10, but not separately for PM-2.5…
>
> 3. The EIR's Treatment of PM-2.5 Was Not an Abuse of Discretion.
>
> We first address the trial court's ruling on the EIR's approach to PM-2.5. Redwood and the Marin County entities argue that the trial court failed to appreciate that the standards the court cited were for ambient air-quality standards and not thresholds of significance to be used for EIRs prepared under CEQA. (E.g., *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal.App.4th 327, 334 [where increases in air pollutants are below significance criteria, they are considered to have no significant impact on ambient-air quality].) We agree it was improper for the trial court to set aside an EIR based on its independent research of air quality standards. "[O]ur Supreme Court has cautioned reviewing courts against performing our own scientific critiques of environmental studies, a task for which we have neither resources nor scientific expertise." (*Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 372, citing *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 393.) "Our duty is not to pass on the validity of the conclusions expressed in the EIR, but only on the sufficiency of the report as an informative document." (*Eureka Citizens*, at p. 372.) We cannot say that the EIR's approach in evaluating PM-2.5 was an abuse of discretion since the EIR relied on BAAQMD guidelines in effect at the time the EIR was prepared. (Rialto Citizens, supra, 208 Cal.App.4th at p. 933 & fn. 15 [EIR's analysis of air quality reasonable in light of approach recommended by agency responsible for attaining state and federal clean-air standards in region].)"

Furthermore, LAWA funded and oversaw completion of the LAX Air Quality and Source Apportionment Study (AQSAS) in 2013 which included measurements of UFP number concentration and particle size distributions at several locations around the Airport.[1] However, it is not LAWA's role to monitor and document air pollutant concentrations on a continuous basis, especially for a pollutant that has no specific regulatory limit or threshold – that is the role of the South Coast Air Quality Management District (SCAQMD), the California Air Resources Board (CARB), and the U.S. Environmental Protection Agency (USEPA). "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters." (CEQA Guidelines § 15204.)

[1] Los Angeles World Airports. LAX Air Quality and Source Apportionment Study, Volumes 1 – 3. June 18, 2013. Available at: http://www.lawa.org/airQualityStudy.aspx?id=7716. Last accessed December 15, 2016.

**LAMP-PC00032-10**

**Comment:** Extension of MTA Metrorail

- Ensure that future rail designs can be extended in the into the Northside Development and north up either Sepulveda or Lincoln Boulevards. Although out of the scope of this project, also make it possible to accommodate transit south into the South Bay as well.

**Response:** The LAX Landside Access Modernization Program considers the project elements described in Chapter 2, Description of the Proposed Project, of the Draft EIR. It does not include Los Angeles

County Metropolitan Transportation Authority (Metro) projects, nor does LAWA have any authority to plan Metro facilities. If Metro determines a need for future rail into the LAX Northside or South Bay area, LAWA will cooperate and coordinate with Metro to evaluate alignment options that would traverse LAWA property. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

**LAMP-PC00032-11**

**Comment:** Automated People Mover (APM) and Central Terminal Area (CTA) improvements

- Accommodate luggage check as early as possible to minimize impacts on travelers with more than one bag or bulky items, children, elderly, or disabled.

**Response:** As discussed in Chapter 2, Description of the Proposed Project, of the Draft EIR, each ITF "would be designed to include airport amenities, which may include valet parking, waiting areas, commercial amenities such as dining and concession services, baggage check facilities, and ticketing/information kiosks to make these facilities attractive and convenient alternatives to the CTA. Some of these amenities may be available when the ITFs open, while other amenities such as baggage check-in facilities may not occur until future years and is subject to FAA and TSA approvals." (see page 2-75 of the Draft EIR). No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

**LAMP-PC00032-12**

**Comment:** - Within CTA ensure commercial and emergency vehicles are not impeded along with effective evacuation routes for vehicles and people.

**Response:** During construction of the Automated People Mover (APM) and associated Central Terminal Area (CTA) improvements, LAWA would ensure that access is maintained to existing terminals throughout the duration of the construction activities. LAWA would require contractors to establish minimal traffic congestion standards which must be maintained throughout the construction period. LAWA and the construction contractors would also collaborate to define Maintenance of Traffic (MOT) plans and associated traffic mitigation measures to minimize impacts to traffic flow both accessing and circulating within the CTA. Commercial and emergency vehicles would continue to access and operate within the CTA in a manner similar to their current operations with adjustments as necessary to accommodate construction activities. Emergency service providers would continue to stage personnel and vehicles within the CTA in order to continue providing rapid first responder services as warranted, pursuant to the mitigation measures discussed in the next paragraph.

Section 4.12.3.7.4, Temporary Traffic, Access, and Transit Impacts during Construction, of the Draft EIR discusses potential impacts to traffic and access during construction. To address significant construction-related traffic and access impacts, including impacts on Los Angeles Fire Department (LAFD), Los Angeles World Airports Police Division (LAWAPD), and Los Angeles Police Department (LAPD) emergency response activities, LAWA has proposed Mitigation Measures MM-ST (LAMP)-1, Construction Traffic Project Task Force, MM-ST (LAMP)-2, Maintenance of Traffic, MM-ST (LAMP)-3, Worksite Traffic Control Plans, MM-ST (LAMP)-4, Roadway Closure Restrictions, and MM-ST (LAMP)-5, Traffic Maintenance During Construction (see Sections 4.11.1.7, 4.11.2.7, and 4.12.3.8 of the Draft EIR). As stated in Sections 4.11.1.8

and 4.11.2.8 of the Draft EIR, with implementation of these mitigation measures, the proposed Project's significant impacts on fire protection and law enforcement emergency services during construction would be reduced to a level that is less than significant. Please see Responses to Comments LAMP-PC00030-16, LAMP-PC00030-17, and LAMP-PC00030-18 for further discussion of impacts to emergency services associated with construction and operation of the proposed Project.

**LAMP-PC00032-13**

**Comment:** - The proposed above grade APM must be convenient for both arrival and departing levels and for transferring passengers between terminals.

**Response:** Please see Response to Comment LAMP-PC00012-3 which describes the transition and flow of passengers between the APM stations and the terminals. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

**LAMP-PC00032-14**

**Comment:** - Ensure the design will all for changes in service into each terminal along curbside or gates instead of locking in the few stops up the middle of the parking lots which require extended travel to the curbside before going to the gates.

**Response:** LAWA considered numerous operational characteristics during the planning of the APM system, including turning radii of proposed APM alignments, effect on APM operations and travel times, and traffic and pedestrian circulation, as well as walk distances. Due to the physical constraints of the CTA and the close proximity of the terminals, a spine alignment with APM stations located approximately equidistant between the north and south terminals best met LAWA's operational criteria for the system.

One of the APM alignments considered by LAWA was a loop alignment within the CTA, with multiple station stops either at each terminal or shared between terminals. Due to space constraints within the CTA, a loop alignment is not technically or operationally feasible – the APM trains would not be able to physically make the turning radii required at the west end of the CTA in front of the Tom Bradley International Terminal. Additionally, a loop alignment would result in greater impacts to the Theme Building. As noted in Section 4.4.5.1.1 of the Draft EIR, after construction of the proposed APM guideway and elevated walkway, the expressive form and design of the Theme Building would no longer be fully discernible when viewed from the east, north and west, which would result in a substantial adverse change to the Theme Building. A loop alignment would worsen this effect, as it would encase the Theme Building on all 4 sides, resulting in a greater impact. The evaluation of an APM loop alignment also determined that the terminals are too closely spaced to allow for adequate headways between terminals to have stations located at every terminal or between every terminal. A discussion of LAWA's evaluation of an APM loop alignment has been added to Section 5.4.1.1.1, as shown in Chapter 3, Corrections and Additions to the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

**LAMP-PC00032-15**

**Comment:** General Comments

P 6-8 of the LAMP DEIR states "…based on the above analysis,…would not directly or indirectly induce LAX passenger growth." This is contrary to earlier studies. Congestion and inconvenience does impact growth at one airport or another when alternatives are available. A prior study showed that roadway capacity and gate constraints limited ultimate growth rather than current runway capacity. An anology is: if a group uses an quart pitcher to serve drinks and is satisfied then if a two gallon pitcher is substituted there will be more to serve as needed by a larger group. A comprehensive assessment of capacity constraints has not been completed. We expect "Natural" increased demand from population and economic growth to have as big an impact as the LAMP improvements so that congestion may remain after the project is complete.

**Response:** The comment quotes an excerpt from a sentence in the Draft EIR. The complete text of that sentence states "In summary, based on the above analysis, reduced traffic congestion in the CTA associated with the proposed Project would not directly or indirectly induce LAX passenger growth." Please see the complete text of Section 6.3.2 of the Draft EIR for a discussion of the rationale for the conclusion that projected future increases in passenger activity levels forecasted by the Federal Aviation Administration (FAA) and the Southern California Association of Governments (SCAG) are anticipated to be realized with or without the proposed Project. Please also see Response to Comment LAMP-AL00008-2 regarding projected passenger and operations growth and capacity at LAX.

As it relates to "natural increased demand from population and economic growth" cited by the commentor, as discussed on page 6-6 in Section 6.3.2, Growth in LAX Passenger Activity Levels, of the Draft EIR, the Federal Aviation Administration (FAA) Terminal Area Forecast (TAF)[1] relied upon by the Draft EIR analyses includes "projected demand for air transportation considering local and national economic conditions."

Section 4.12.1, On-Airport Transportation, and Section 4.12.2, Off-Airport Transportation, assess traffic conditions in 2024 and 2035, which includes the growth in population, employment, and housing anticipated to occur in the area as forecast by the Southern California Association of Governments (SCAG), and includes the growth in aviation activity forecast by both the FAA and SCAG for LAX. Thus, the Draft EIR analyzes traffic conditions in the future with or without the proposed Project.

[1] Federal Aviation Administration, APO Terminal Area Forecast 2014, January 2015.

**LAMP-PC00032-16**

**Comment:** The assumed passenger capacity and expected vehicle counts need clarification. LAWA has stated that it is based on the FAA estimates of 850K operations; whereas LAWA repeatedly has used a 2035 estimate of 96 MAP as the basis for estimating flight passengers to be used to serviced and as a basis for estimating for numbers of vehicles. The two numbers appear inconsistent. Attachment A is backup material for this capacity review in which we calculated the annual ratio of millions of annual passengers

(MAP)/100,000 flight operations using the annual flight operations/passengers information reports provided on the LAWA website. .

**Attachment A Evaluation of the Passenger Capacity at LAX**

Here is year over year comparisons the last 10 using data from the LAWA.org website:

| year | ops (000) | MAP | MAP/100K ops |
|---|---|---|---|
| 2004 extrap | 800 | 78.9 | 0.099 |
| 2008 | 558.4 | 59.8 | 0.107 |
| 2009 | 503 | 56.5 | 0.112 |
| 2010 | 520.7 | 59 | 0.113 |
| 2011 | 547.9 | 61.9 | 0.113 |
| 2012 | 549.9 | 63.7 | 0.116 |
| 2013 | 559.1 | 66.7 | 0.119 |
| 2014 | 578 | 70.7 | 0.122 |
| 2015 | 587.6 | 74.9 | 0.127 |
| 2035 | 850 | 96 | 0.113 |

*plugged in 96 MAP for 2035 estimate given by LAWA.

In 2004 (yr of the initial settlement) LAWA was limited to 78.9 Million Annual Passengers MAP) this was a ratio of .099. This ratio increases every year since 2008 due to the introduction of larger aircraft and a higher load factor of more completely filled aircraft.

The last complete year, 2015, was 0.127. We would expect this to continue to increase as the load factors approach full and the aircraft coming to LAX grow in size. This is NOT the case of the LAWA estimate used of 96 MAP and 850,000 operations.

This leads to a conclusion that the flight mix used for numbers of aircraft is questionable.

The total number of passengers is important on LAMP because it's the basis on estimating the number of vehicles entering the CTA and thereby impacting pollution and traffic counts. Given this number of operations assumed and the current load factor/size of aircraft would result in 107 MAP in 2035.

One or both of the numbers assumed are wrong...

**Response:** The comment includes calculations of annual ratios of million annual passengers (MAP) per 100,000 flight operations and suggests there may be inconsistencies in the numbers, as further discussed in Attachment A of the commentor's letter.

As discussed on pages 4.12-29, 4.12-33 and 6-6 of the Draft EIR, as input into the traffic analyses, LAWA's expert aviation consultants developed two peak month average day (PMAD) flight schedules based on the numbers of passengers and operations published in the FAA's TAF[1] and documented in a report entitled *LAX 2024 and 2035 Passenger Flight Schedules Development Report*.[2,3] As documented on page 1 in Table 1 of the report, the Draft EIR analyses assumed 860,987 annual operations for the proposed Project horizon year of 2035. This activity level is based upon the results of the FAA 2014 TAF. For the purposes of the Draft EIR analyses, the 2030 passenger activity levels from the FAA 2014 TAF were held constant to 2035 to be consistent with the results of the Southern California Association of Governments' (SCAG's) Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy,[4] and by association so were the projected number of operations.

It appears that "Attachment A" to the comment letter uses the Volume of Air Traffic (VOAT) reports published by LAWA as a source for the numbers of passenger operations between 2008

and 2015. Accordingly, in 2015, LAX recorded 587,638 operations (including scheduled, commuter, and charter passenger operations).[5]

However, the inconsistencies cited by the commentor are a result of the commentor's use of 850,000 operations in 2035 in its calculated ratio. It is unclear which source the commentor used to determine the 850,000 projected operations in 2035. As discussed in the *LAX 2024 and 2035 Passenger Flight Schedules Development Report*, the FAA 2014 TAF estimated that the LAX operation activity levels would reach 860,987 total operations in 2030 (which was subsequently held to 2035, as discussed in Response to Comment LAMP-AL00008-2.) It is important to note that the 860,987 operations assumed for 2035 includes all operations, not just scheduled, commuter, and charter passenger operations necessary to calculate the ratio discussed by the commentor. Based on current ratios, the number of scheduled, commuter, and charter passenger operations commensurate to 860,987 total operations would be 771,776 operations (i.e., approximately 89.6 percent).[6] The ratio of MAP to 100,000 operations for 2035 should then be 0.124, which is very similar to that calculated by the commentor for 2015 at 0.127. Therefore, the commentor's concern that there are inconsistencies in the numbers used in the Draft EIR analyses is unwarranted.

[1] Federal Aviation Administration, APO Terminal Area Forecast 2014, January 2015.

[2] Ricondo & Associates, Inc., LAX 2024 and 2035 Passenger Flight Schedules Development Report, August 2016.

[3] As indicated on pages 1-17 and 8-10 of the LAX Landside Access Modernization Program Draft EIR, all documents referenced in the Draft EIR, including the FAA 2014 TAF and Ricondo & Associates, Inc., LAX 2024 and 2035 Passenger Flight Schedules Development Report, were available for public inspection at the following location during the public review period for the Draft EIR: Los Angeles World Airports, One World Way, Room 218, Los Angeles, CA 90045. These documents continue to be, and will remain, available for public inspection until after final consideration of the proposed Project and Final EIR by the Los Angeles City Council.

[4] Southern California Association of Governments' (SCAG's) Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life, Adopted April 7, 2016, Available: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

[5] City of Los Angeles, Los Angeles World Airports, Statistics – Volume of Air Traffic, LAX Traffic Comparison Report for December 2008 through 2015, Available: http://www.lawa.org/LAXStatistics.aspx; accessed December 8, 2016.

[6] To estimate the number of scheduled, commuter, and charter passenger operations commensurate to 860,987 total operations assumed for 2035, a ratio of the scheduled, commuter, and charter passenger operations over the total operation was calculated for 2015. Based on LAWA's Volume of Air Traffic (VOAT) and Traffic Comparison (TCOM) reports for December 2015, the number of scheduled, commuter, and charter passenger operations was 587,638 in 2015, compared to a total number of operations of 655,564, resulting in a ratio of approximately 89.6 percent. That ratio was then applied to the assumed number of total operations in 2035 (i.e., 860,987) to derive 771,776 scheduled, commuter, and charter passenger operations in 2035. (Source: City of Los

Angeles, Los Angeles World Airports, Statistics – Volume of Air Traffic, LAX Traffic Comparison Report and Volume of Air Traffic Report for December 2015, Available: http://www.lawa.org/LAXStatistics.aspx; accessed December 8, 2016).

**LAMP-PC00032-17**

**Comment:** When the 2004 when Master Plan Alternative D was created it was expected that 153 gates would limit LAX capacity to 78.9 MAP (which coinsidently was the estimate for the limiting factor due to vehicles into the CTA). A changed flight mix with larger aircraft holding more passengers per flight operation and airline efficiency passenger load factors increases voids that assumption. This calculated ratio increased steadily from 2004 through 2015 (the last complete year available). The MAP increases yearly until the 2035 figure. The 2015 ratio calculates a 2035 estimate of 108 MAP, not 96. We would expect other limitations to stop LAX growth and cause the additional unconstrained growth sent to regional airports.

**Response:** See Response to Comment LAMP-PC00032-16 which explains that the ratio calculated by the commentor for 2035 was incorrect, and therefore, that the commentor's concern that there are inconsistencies in the numbers used in the Draft EIR analyses is unwarranted. As discussed in Response to Comment LAMP-AL00008-2, a number of factors affect the capacity of an airport, including airfield facilities and configuration, as well as terminal configurations and aircraft gates. As noted on page 6-8 in Chapter 6 of the Draft EIR, SCAG identifies the airfield as the limiting factor of capacity at LAX, based on the existing runway configuration.

**LAMP-PC00032-18**

**Comment:** Additional comments

1. ARSAC had asked in its comment letter on the NOP to include other feasible APM configurations in the Central Terminal Area as a part of the range of alternatives. ARSAC's suggestions for APM alignments were created with passenger convenience in mind by going to all terminals with a minimum of walking distance between APM stations and the passenger terminals. Why was this analysis not done?

**Response:** Pursuant to CEQA, "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." (CEQA Guidelines § 15126.6(a).) "An EIR need not consider every conceivable alternative to a project. Rather it must include a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation." (Ibid.) None of the APM configurations identified in ARSAC's comments on the NOP would feasibly attain most of the basic objectives of the LAX Landside Access Modernization Program and also avoid or substantially lessen any of the significant effects of the proposed Project. Therefore, they were not carried forward for analysis in the Draft EIR. Please see Response to Comment LAMP-PC00012-2 for a discussion of APM alignment alternatives considered, which include the concepts identified in ARSAC's NOP letter, specifically APM alignments over the terminals, over the roadway, and over the CTA parking garages. As noted in the Response to Comment LAMP-PC00012-2, these alternatives would require the reconstruction of the terminals, upper level roadway, and/or CTA parking garages. Reconstruction of each terminal would be tremendously costly and severely impact access to the passenger terminals and aircraft gates during construction. Therefore, due to the severe impact to Airport operations, this alignment option was considered infeasible. An alignment over the roadway would result in the permanent removal of up to two roadway lanes for the placement of APM support columns. Removal of these lanes would severely impact vehicular access to the passenger terminals within the CTA. Therefore, due to the severe impact to Airport

operations, this alignment option was considered infeasible. Construction of an APM alignment over the CTA parking garages would require substantial structural changes to the existing parking garages within the CTA. During construction of this alternative, the already constrained existing parking capacity within the CTA would decrease by approximately 40 percent. Therefore, because of the substantial demolition required and the temporary reduction in CTA parking, this alignment option was considered infeasible.

ARSAC's NOP letter also identified personal rapid transit (PRT) alternatives, which were discussed and dismissed in the Draft EIR (see Section 5.4.1.1.3 of the Draft EIR).

Also, please refer to Response to Comment LAMP-PC00032-14 for a discussion of the operational characteristics LAWA considered during the planning of the APM system. As noted in that response, an APM loop alignment would result in greater impacts to the Theme Building than the proposed Project. As mentioned therein, a discussion of LAWA's evaluation of an APM loop alignment has been added to Section 5.4.1.1.1, as shown in Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-PC00032-19**

**Comment:** 2. In proposing a "spinal" APM alignment in the CTA, it appears that LAWA has engaged in "pre-determination" of an alternative. The other alternatives included in the DEIR do not offer other APM alignments; it is as though the alteratives presented were "straw men" rather than feasible alternatives. Please explain how this selection of alternatives meets CEQA requirements?

**Response:** Please refer to Response to Comment LAMP-PC00032-18 for a discussion of CEQA's requirements for consideration and discussion of alternatives in an EIR. There is no evidence presented in the comment, or elsewhere in the record, that LAWA has "predetermined" to implement any alternative. EIRs are predicated on a lead agency identifying a "proposed project" for EIR evaluation. Proposing a particular project is simply part of the City's planning process and is permitted by CEQA. The range of alternatives presented in the Draft EIR is reasonable and complies with CEQA.

The Draft EIR also explained why other alignment alternatives were considered, but not selected for detailed EIR evaluation. Please see Response to Comment LAMP-PC00012-2 for a discussion of APM alignment alternatives considered. Please refer to Response to Comment LAMP-PC00032-14 for a discussion of the operational characteristics LAWA considered during the planning of the APM system. As mentioned therein, a discussion of LAWA's evaluation of an APM loop alignment has been added to Section 5.4.1.1.1, as shown in Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-PC00032-20**

**Comment:** 3. ARSAC requests that LAWA consider building in a wye (three point train switch track) at the east end of the APM alignment in the CTA. The purpose of the wye would be to allow for LAWA to construct a future loop or double loop APM route in the CTA where the APM could be routed to all passenger terminals.

**Response:** Please see Response to Comment LAMP-PC00012-2 for a discussion of APM alignment alternatives considered. Please refer to Response to Comment LAMP-PC00032-14 for a discussion of the operational characteristics LAWA considered during the planning of the APM system, including a loop alignment. As mentioned therein, a discussion of LAWA's evaluation of an APM loop alignment has been added to Section 5.4.1.1.1, as shown in Chapter 3, Corrections and Additions to the Draft EIR.

**LAMP-PC00032-21**

**Comment:** 4. Historic Preservation- Theme Building. ARSAC agrees that the Theme Building be protected as a landmark. ARSAC encourages LAWA to find a new concessionaire to re-open the Theme Building as a restaurant and to have the observation deck open to the public.

a. Why was Flight Path Learning Center & Museum listed as potential Theme Building tenant?

b. Who at Flight Path did LAWA consult with before including a potential move to the Theme Building in this DEIR?

**Response:** As identified in Mitigation Measure LAX-HR (LAMP)-1,[1] Preservation of Historic Resources: Theme Building and Setting (see Section 4.4.7.1 of the Draft EIR), LAWA is committed to preserving the Theme Building as a historic resource and rehabilitating it for a new use that maintains controlled public access to the building's atrium, lobby and former restaurant space. The mitigation measure states that potential new uses for the Theme Building include, but are not limited to, a restaurant, the relocated Flight Path Learning Center and Museum, or a meeting/event space.

Please note that these are potential uses; it does not mean that the Flight Path Learning Center and Museum would be relocated to the Theme Building. However, a public use such as a museum or learning center would be suitable. No further response is required to the questions in the comment regarding potential Theme Building tenants or consultation with the Flight Path because they do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

[1] A typographical error in the Draft EIR pertaining to the title of this mitigation measure has been corrected as follows to clarify that this mitigation measure is specific to the proposed Project and is not a LAWA Standard Control Measure applicable to all LAX projects: ~~LAX~~ *MM*-HR (LAMP)-1, Preservation of Historic Resources: Theme Building and Setting Mitigation Measure. This typographical error has been corrected throughout the text of the Draft EIR (See Chapter 3, Corrections and Additions to the Draft EIR).

**LAMP-PC00032-22**

**Comment:** 5. Historic Preservation- 1961 Control Tower. ARSAC agrees that the original "Jet Age" airport control tower should be preserved. As a part of this preservation, will LAWA reinstall the metal louvers that once clad the control tower to return the tower to its 1961 appearance?

**Response:** As identified in Mitigation Measure MM-HR (LAMP)-2, Protection of 1961 Airport Traffic Control Tower (see Section 4.4.7.1 of the Draft EIR), LAWA is committed to protecting the 1961 Airport Traffic Control Tower as a historic resource. As noted on page 28 in Appendix J, LAX Preservation Plan, of the Draft EIR, LAWA will prepare a Historic Structure Report (HSR) on the 1961 Airport Traffic Control Tower. The HSR shall provide complete documentary, graphic, and physical information about the building's history, significance, and existing condition. The report shall outline a recommended scope of work for mothballing and exterior rehabilitation, and include recommendations for appropriate treatment and maintenance of existing historic fabric, and replication of missing exterior features. Page 29 of Appendix J of the Draft EIR notes that rehabilitation shall include the restoration of the Tower's exterior metal louvers if feasible.

**LAMP-PC00032-23**

**Comment:** 6. Paleontological Survey. In Appendix A, PDF page 140, it is written, "Some areas were fenced-off and inaccessible during the survey; therefore, PCR could not thoroughly inspect these areas but they could be viewed from a distance."

a. Why did the survey team not get access to the areas they needed to view? What efforts were made to make certain that access was granted?

b. Why did LAWA pay for a report that was not complete where the survey team only looked through a fence and actually examined the soil of the subject properties?

c. Does LAWA feel that the survey is adequate for CEQA compliance purposes? Or will LAWA have the survey updated before the Final EIR?

**Response:** In January 2015, PCR Services Corporation (PCR) conducted an archaeological and paleontological assessment for the LAX Landside Access Modernization Program (included in both Appendix A [starting on page 132 of the PDF] and also as Appendix I of the Draft EIR). The scope of work for the assessment included conducting records searches, review of historic aerials from the National Environmental Title Research (NETR) Online, Native American consultation, and a pedestrian survey of the study area. As part of the pedestrian survey, PCR investigated areas where the ground surface was exposed and where the likelihood of surface resources was possible. These included areas in Manchester Square, where properties that have been acquired are currently fenced-off until acquisition of the entire area is complete, as well as private property. The limited space of these properties allowed the survey team to view the entire area, even though a pedestrian survey on the property was not conducted. However, these areas have all been previously disturbed and it is unlikely that they contain archeological or paleontological resources.

As noted in the Draft EIR (see page 4.4-48), while discovery of paleontological resources in artificial fill deposits within the Project area is unlikely, proposed excavations that would occur below the fill levels could impact intact paleontological resources that have not been disturbed or displaced by previous development. Since the proposed Project would include excavations of varying depths across portions of the Project area, including excavations at depths where native soils would be encountered, the proposed Project could impact previously unknown buried unique paleontological resources. The Draft EIR recognizes that there could be buried paleontological resources; however, the likelihood of surficial paleontological resources that would be discovered in a pedestrian survey is low. As noted on page 11 of the January 2015 archaeological and paleontological report by PCR (PDF page 144 in Appendix A and PDF page 14 of Appendix I of the Draft EIR), according to the Natural History Museum of Los Angeles County (NHMLAC), the study area is comprised of surficial deposits consisting of older Quaternary Alluvium derived as fluvial deposits composed from older Quaternary dune sands located in the western portion of the study area, roughly west of Sepulveda Boulevard and surficial deposits consisting of older Quaternary Alluvium, derived primarily from the Windsor Hills to the north and the Rosecrans Hills to the east of the study area. Both of these types of sedimentary deposits typically do not contain paleontological resources in the uppermost layers; however, these deposits are conducive to retaining paleontological resources at depth. Based on the above information, the survey conducted in 2015 of the Project area is sufficient to determine the likely effects of the proposed Project on paleontological resources.

Furthermore, as discussed in Section 4.4.3.1.3 in Section 4.4, Cultural Resources, of the Draft EIR, LAWA has developed an Archaeological Treatment Plan (ATP) and a Paleontological Management Treatment Plan (PMTP) outlining procedures for previously unidentified resources

encountered during construction that are applicable to all LAX projects. As indicated in Sections 4.4.7.2 and 4.4.7.3 of the Draft EIR, conformance with LAWA's ATP and PMTP are proposed as mitigation measures for the LAX Landside Access Modernization Program to reduce impacts to previously unidentified archaeological and paleontological resources to a level that is less than significant.

**LAMP-PC00032-24**

**Comment:** 7. Upper Level and Lower Level Roadway user changes. At a recent BOAC meeting, staff had presented moving hotel shuttle buses and TNC's to the lower level. Other users would be confined to either upper or lower levels and a few could go to both. How does this proposal fit into LAMP if at all?

**Response:** The implementation of single-level busing at LAX was initiated on January 23, 2017 and includes restricting of private off-Airport parking shuttles to the departures levels roadway and hotel shuttles to the arrivals level roadways for passenger pick-up and drop-off operations. This action was taken to reduce existing traffic congestion that results from shuttle buses re-circulating between the departures and arrivals level of the terminal roadway system, and is independent of the proposed Project.

The Draft EIR assumes, under the Without Project scenario for both future conditions (2024 and 2035) as described in Section 4.12.1.6, On-Airport Transportation System Improvements, that for more efficient operations throughout the CTA, single-level busing would be implemented. Private parking shuttles would be relegated to the upper level, while hotel shuttles would use the lower level.

**LAMP-PC00032-25**

**Comment:** We look forward to your responses.

**Response:** Please see Responses to Comments LAMP-PC00032-1 through LAMP-PC00032-24 above.

## LAMP-PC00033 Tamaki, Kevin — Valley Industry & Commerce Association — 10/4/2016

**LAMP-PC00033-1**

**Comment:** The Valley Industry and Commerce Association (VICA) supports the proposed Los Angeles International Airport (LAX) Landside Access Modernization Program (LAMP), which would enhance vehicular and pedestrian access to the airport.

As one of the largest international airports in the United States, we must ensure that passengers and visitors have convenient, affordable and reliable access to the airport facilities. Unfortunately, due to increasing demand, access to areas around the Central Terminal Area (CTA) have become severely congested. With LAX serving as the largest international gateway on the West Coast, VICA supports the proposed LAMP to improve passenger quality-of-service and provide world-class facilities for its customers.

In order to transform the airport into a modern airport, Los Angeles World Airports (LAWA) is committed to redeveloping ground access to the airport. We believe these improvements will provide seamless connections to major highway and public transit systems, easing traffic and congestion for all Angelinos. Without a direct connection to Metro, a consolidated car rental

facility and alternative modes of transit access to the CTA – businesses and local residents will continue to face heavy traffic congestion.

Since 2004, LAWA has sought to address these concerns by proposing new facilities, infrastructure and system improvements to provide new options for passengers and employees accessing the passenger terminal areas. The DEIR represents years of collaboration and hard work to advance and transform LAX's access system. This plan will provide more certainty, reduce traffic congestion and improve air quality around the airport.

The project components – including the access to the Automated People Mover (APM), Intermodal Transportation Facilities (ITFs), Consolidated Rental Car Center (CONRAC) and a direct connection to Metro – will strengthen the region's economic standing and promote business growth throughout Southern California. By removing the number of vehicles within the CTA, LAWA anticipates improved traffic flow throughout surrounding areas of the airport.

LAX was created as a portal for economic investments throughout California. In 2015, LAX handled 655,564 aircraft landings and takeoffs. By enhancing the passenger experience with new access for all modes of transportation, Southern California is securing its place as an economic leader. Our local businesses rely on LAX to provide a connection to domestic and foreign markets around the world.

VICA is proud to support the LAX Landside Access Modernization Program as presented in the September 15, 2016 Draft Environmental Impact Report (DEIR). We believe LAWA has made a good-faith effort to communicate with effected stakeholders, mitigate potential negative impacts and put forward a strong proposal to ease traffic around LAX and promote economic growth.

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

## LAMP-PC00034 Cully, Mark None Provided 11/5/2016

### LAMP-PC00034-1

**Comment:** Appendix J of your DEIR fails to include the former NIKE site, located at the intersection of Westchester Parkway and Pershing Drive. The remaining portion of the site houses the Jet Pets business, however these buildings, along with silos formerly located in the area where Westchester Parkway intersects Pershing Drive, helped form a significant missile defense system during the post-WWII Cold War era. This site is worth review, inclusion and preservation. Thank you.

**Response:** The commentor is referring to the property at 9111 Falmouth Avenue, currently occupied by Jet Pets, Inc. 9111 Falmouth Avenue is located at the northwest edge of the LAX property, approximately 8,000 feet from the closest area potentially affected or disturbed by the proposed LAX Landside Access Modernization Program. Because there would be no potential impact to 9111 Falmouth Avenue, it was not included in discussions of historic resources in Section 4.4, Cultural Resources, of the Draft EIR. As indicated on page 4.4-1 of the Draft EIR, on-site inspections of the Central Terminal Area (CTA) were conducted in February 2015 and on-site inspections of developed areas outside of the CTA were conducted in May, June, November, and December 2015. Fieldwork focused on the assessment of historic integrity and the identification of character-defining features for structures located in areas affected or adjacent to the Automated People Mover (APM) guideway and stations, APM Maintenance and Storage Facility

(MSF), parcels comprising the Intermodal Transportation Facility (ITF) and Consolidated Rental Car Facility (CONRAC) sites, and parcels that could be affected by other components of the proposed Project including roadway improvements and enabling projects. As the proposed Project would have no effect on the former NIKE site, it was not evaluated as part of the proposed Project.

## LAMP-PC00035 Kooklanfar, Peymon None Provided 11/7/2016

**LAMP-PC00035-1**

**Comment:** Would like to know more about the impact on the adjacent neighborhood.

**Response:** All impacts associated with the LAX Landside Access Modernization Program, including those on neighborhoods adjacent to LAX, are discussed in the Draft EIR. The Draft EIR is available for review at the locations listed below. Review dates and times vary by location. The documents can also be reviewed at www.connectinglax.com.

| | | |
|---|---|---|
| Westchester-Loyola Village Branch Library<br>7114 W. Manchester Avenue<br>Los Angeles, CA 90045 | Dr. Mary McLeod Bethune Regional Branch Library<br>3900 S. Western Avenue<br>Los Angeles, CA 90062 | Culver City Library<br>4975 Overland Avenue Culver City, CA 90230 |
| El Segundo Library<br>111 W. Mariposa Avenue<br>El Segundo, CA 90245 | Hawthorne Library<br>12700 Grevillea Avenue<br>Hawthorne, CA 90250 | Inglewood Library<br>101 W. Manchester Boulevard<br>Inglewood, CA 90301 |

## LAMP-PC00036 Mass, Andrew None Provided 10/31/2016

**LAMP-PC00036-1**

**Comment:** Thanks! Any chance you can cut down the NOISE! Esp. early in the morning.

**Response:** The LAX Landside Access Modernization Program addresses ground access improvements. The proposed Project would not cause any changes to aircraft operations; departures and arrivals runway utilization; or runway configuration. Therefore, noise from aircraft operations would not be affected by the proposed Project and was not addressed in the Draft EIR.

As discussed in Section 4.9.3.2 of the Draft EIR, ambient noise measurements were undertaken to establish existing noise levels at various locations in proximity to construction activity associated with the proposed Project. Noise measurement locations represent the noise-sensitive receptors that would most likely be affected by construction noise.

As stated in Section 4.9.3.5 of the Draft EIR, the daily transportation of construction workers and the hauling of materials would cause increases in noise levels along study area roadways, including Imperial Highway. Construction-related trucks would be restricted to designated routes ensuring these vehicles utilize the nearby freeways and major arterials around the Airport, avoiding minor arterials and local streets (see Figure 2-50 in Chapter 2, Description of the Proposed Project). A doubling of sound energy results in a 3 dB(A) increase, which means that a doubling of sound wave energy (e.g., doubling the volume of traffic on a roadway) would result in a barely perceptible change in sound level. Given these haul routes would be traveling along freeways and major arterials, such as Imperial Highway, that already are high-volume routes,

construction traffic would not double or triple the existing traffic volumes along these routes. As such, impacts related to construction traffic noise would be less than significant because noise increases would be less than 3 dB(A) Leq(h).

The Draft EIR road traffic noise analysis accounts for all of the trips on the roadways associated with passenger activity levels in 2024 and 2035 based on the traffic model output identified in Section 4.12.2.2.5, Methodology and Modeled Scenarios, of Section 4.12.2, Off-Airport Transportation, of the Draft EIR. The traffic model accounted for growth in population, housing, employment, and passengers for both 2024 and 2035, as captured in the Southern California Association of Governments (SCAG) regional model. Section 4.9.2.5 of Section 4.9, Noise, of the Draft EIR identifies the road traffic noise associated with the proposed Project in both 2024 and 2035.

Los Angeles World Airports (LAWA) is committed to minimizing noise impacts in neighboring communities from aircraft operating at LAX. Since 1959, LAWA has developed and implemented noise abatement programs, sought partnership-based solutions and worked with stakeholders in a cooperative and collaborative manner. In particular, LAWA has worked proactively with the Federal Aviation Administration (FAA) for many years to implement various noise abatement procedures.

For more information about LAWA's noise abatement programs and related information, please go to www.lawa.org/laxnoise.

## LAMP-PC00037 Long, Domenica Rose None Provided 10/31/2016

**LAMP-PC00037-1**

**Comment:** How about nosies factor on the north side of airport?

**Response:** As discussed in Response to Comment LAMP-PC00036-1, noise from aircraft operations would not be affected by the proposed Project and was not addressed in the Draft EIR.

For purposes of this response, the north side of the Airport is considered to be north of Westchester Parkway and west of S. Sepulveda Boulevard.

Section 4.9, Noise, of the Draft EIR addresses operational and construction noise associated with the proposed Project, including road traffic noise, construction traffic and equipment noise and vibration, and transit noise and vibration. The proposed Project addresses ground access improvements; as the proposed Project would not cause any changes to aircraft operations; departures and arrivals runway utilization; or runway configuration, noise from aircraft operations would not be affected by the proposed Project and is not addressed in this section. (See Chapter 2, Description of the Proposed Project, of the Draft EIR).

Road traffic noise impacts were evaluated using the methods described in Section 4.9.2.2, Methodology, and considered factors for traffic (roadway) noise. This included the use of the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) to predict traffic-related noise in the Project area, including the areas north of the Airport. In addition, the Draft EIR utilized other modeling techniques (SoundPLAN) to address noise impacts that were within the more immediate proximity of the Project site.

As shown in Figure 4.9.2-1 of the Draft EIR, several monitoring locations were identified to assess Project-related noise impacts both on areas north and south of the Airport, as well as at

other locations in nearby communities and neighborhoods. With regards to areas north of the Airport, 20-minute measurements were taken to determine existing (ambient) noise levels at locations RT1 (northern corner of Centinela Avenue and Culver Boulevard), RT2, (northeast corner of Sepulveda Boulevard and Slauson Avenue), RT3 (southeast corner of Lincoln Boulevard and Jefferson Boulevard), and RT4 (northeast corner of Sepulveda Boulevard and Manchester Avenue). As noted in Table 4.9.2-3 of the Draft EIR, the ambient noise levels at the locations north of the Airport was determined to be 73.1 dB(A)[1] at RT1, 72.9 dB(A) at RT2, 72.5 dB(A) at RT3, and 72.2 dB(A) at RT4.

Section 4.9.2.5 of the Draft EIR evaluated the potential increase in noise that would result from the operation of the proposed Project from traffic-related roadway noise.

Noise modeling was completed to predicted road traffic noise levels for existing baseline (Year 2015) and future cumulative (2024 and 2035) conditions, which include cumulative traffic, to identify roadways most likely to experience increased traffic due to the proposed Project (see Sections 4.9.2.5 and 4.9.2.6). As shown in Figure 4.9.2-2 of the Draft EIR, major arterial intersections to the north of the Airport that would be potentially impacted by the proposed Project include study intersection 23 (Lincoln Boulevard and La Tijera Boulevard), study intersection 62 (La Tijera Boulevard and Sepulveda Boulevard), and study intersection 63 (Westchester Parkway and S. Sepulveda Boulevard).

As shown in Table 4.9.2-4, compared to baseline (2015) conditions, roadway noise levels would decrease 0.2 dB(A) at study intersection 23 (Lincoln Boulevard and La Tijera Boulevard), decrease 0.4 dB(A) at study intersection 62 (La Tijera Boulevard and Sepulveda Boulevard), and increase 1.5 dB(A) at study intersection 63 (Westchester Parkway and S. Sepulveda Boulevard) after implementation of the proposed Project. As discussed in Section 4.9.2.5 of the Draft EIR, under this comparison, the traffic noise levels at each of the adjacent and surrounding roadways, including areas to the north of the Airport, would not exceed the 3 dB(A) CNEL[2] threshold over ambient conditions; therefore road traffic noise impacts would be less than significant.

As shown in Table 4.9.2-6, when comparing future (2024) Without Project to future (2024) With Project conditions, roadway noise levels would increase 0.2 dB(A) at study intersection 23 (Lincoln Boulevard and La Tijera Boulevard), decrease 0.6 dB(A) at study intersection 62 (La Tijera Boulevard and Sepulveda Boulevard), and decrease 0.1 dB(A) at study intersection 63 (Westchester Parkway and S. Sepulveda Boulevard). As discussed in Section 4.9.2.6 of the Draft EIR, under this comparison, the traffic noise levels at each of the adjacent and surrounding roadways, including areas to the north of the Airport, would not exceed the 3 dB(A) CNEL threshold over ambient conditions; therefore road traffic noise impacts would be less than significant.

As shown in Table 4.9.2-7, when comparing future (2035) Without Project to future (2035) With Project conditions, roadway noise levels would increase 0.2 dB(A) at study intersection 23 (Lincoln Boulevard and La Tijera Boulevard), decrease 0.2 dB(A) at study intersection 62 (La Tijera Boulevard and Sepulveda Boulevard), and decrease 0.2 dB(A) at study intersection 63 (Westchester Parkway and S. Sepulveda Boulevard). As discussed in Section 4.9.2.6 of the Draft EIR, under this comparison, the traffic noise levels at each of the adjacent and surrounding roadways, including areas to the north of the Airport, would not exceed the 3 dB(A) CNEL threshold over ambient conditions; therefore road traffic noise impacts would be less than significant.

Section 4.9.3 of the Draft EIR evaluated the potential increase in noise that would result from Project-related construction traffic and equipment noise and vibration. As discussed on page 4.9-47 in Section 4.9.3.5 of the Draft EIR, the closest noise-sensitive receptor north of the Airport

during construction would be the residential development (RT4) north of Westchester Parkway during the Lot C reconfiguration. This residential development would be approximately 600 feet from the closest point of construction-related operations. Based on an existing ambient noise level of 72.2 dB(A) CNEL in that area (refer to Table 4.9.2-3 of the Draft EIR), the distance at which construction equipment noise would result in a 5 dB(A) increase over the existing ambient noise level (the threshold of significance) would be approximately 190 feet or less. Given the distance to the closest sensitive receptor is greater than 190 feet, construction equipment noise impacts on sensitive receptors north of the Airport from construction activities at Lot C would be less than significant because construction activities would not exceed ambient exterior noise level by 5 dB(A) at a noise-sensitive use.

Section 4.9.4 of the Draft EIR evaluated noise and vibration impacts associated with operation of transit systems included in the proposed Project, specifically, the Automated People Mover (APM) and associated components. As shown in Table 4.9.4-1 of the Draft EIR, transit noise levels would result in a maximum increase of 0.6 dB(A) approximately 100 feet from the APM guideway. Given that the noise-sensitive uses north of the Airport are located more than 100 feet from the proposed APM, transit noise levels would further be reduced and ambient noise levels to the north of the Airport would not exceed the 3 dB(A) or more in CNEL within the "normally unacceptable" or "clearly unacceptable" category, or the 5 dB(A) threshold over ambient conditions. As such, noise and vibration impacts from the proposed APM system would be less than significant.

Section 4.9.5 of the Draft EIR, evaluated the cumulative changes that would result from the combination of road traffic, transit, and construction noise levels. It is likely that there would be some overlap in noise impacts from operation (including road traffic noise and transit noise) during construction between 2024 and 2035. As described in Section 4.9.5 of the Draft EIR, the largest contributor to combined cumulative noise impacts is construction equipment noise. With regard to areas to the north of W. Arbor Vitae Street/Westchester Parkway, the closest construction activities would take place approximately 600 feet from the closest noise-sensitive receptor, which would also be the closest receptor to any construction activity north of Westchester Parkway. As stated above, construction related activity would not exceed the ambient exterior noise level by 5 dB(A) at the noise-sensitive receptors north of the Airport.

[1] A-Weighted Sound Pressure Level (dB(A)): The decibel (dB) is a unit used to describe sound pressure level. When expressed in dB(A), the sound has been filtered to reduce the effect of very low and very high frequency sounds, much as the human ear filters sound frequencies. Without this filtering, calculated and measured sound levels would include events that the human ear cannot hear (e.g., dog whistles and low-frequency sounds, such as the groaning sounds emanating from large buildings with changes in temperature and wind). With A-weighting, calculations and sound-monitoring equipment approximate the sensitivity of the human ear to sounds of different frequencies.

[2] Community Noise Equivalent Level (CNEL): CNEL, expressed in dB(A), is the standard metric used in California to represent cumulative noise exposure. The metric provides a single-number description of the sound energy to which a person or community is exposed over a period of 24 hours. CNEL includes penalties applied to noise events occurring after 7:00 p.m. and before 7:00 a.m., when noise is considered more intrusive. The penalized time period is further subdivided into evening (7:00 p.m. through 9:59 p.m.) and nighttime (10:00 p.m. to 6:59 a.m.). When a noise event occurs in the evening, a penalty of 4.77 dB(A) is added to the nominal sound level (equivalent to a threefold increase in aircraft

operations). A 10 dB(A) penalty is added to nighttime noise events (equivalent to a tenfold increase in aircraft operations).

## LAMP-PC00038 Rojas, Hugo None Provided 10/31/2016

**LAMP-PC00038-1**

**Comment:** Issue: 1. Freeway Access. 2. Will there be new exit/entrance to fwy.

**Response:** Information regarding freeway ramp improvements as part of the LAX Landside Access Modernization Program is found in Chapter 2, Description of the Proposed Project, (see page 2-132) and Chapter 4.12.2, Off-Airport Traffic, (see page 4.12-97) of the Draft EIR. Further detailed information regarding traffic impacts for the freeway access ramps are provided in Appendix O of the Draft EIR.

**LAMP-PC00038-2**

**Comment:** 3. Eminent domain.

**Response:** Property acquisition, including the use of eminent domain, is discussed in Chapter 2, Description of the Proposed Project, of the Draft EIR (see pages 2-161 through 2-168). Impacts related to eminent domain are discussed in Section 4.10, Population and Housing, of the Draft EIR (see pages 4.10-29 and 4.10-30).

## LAMP-PC00039 Diewock, Liz None Provided 10/31/2016

**LAMP-PC00039-1**

**Comment:** This plan is long overdue

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

## LAMP-PC00040 Williamsen, Ralph None Provided 10/31/2016

**LAMP-PC00040-1**

**Comment:** I STRONGLY SUPPORT THE IMPROVEMENTS! I APPRECIATE THE YEARS OF WORK THAT HAVE GONE INTO THE PRELIMINARY PLAN.

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

## LAMP-PC00041 Hammett, Lovely None Provided 10/31/2016

**LAMP-PC00041-1**

**Comment:** I would like more information on the Automated People Mover System and Consolidated Rental Car Facility. Thanks!

**Response:** As part of the LAX Landside Access Modernization Program, LAWA intends to construct several ground access facilities, including an APM and CONRAC facility. Details of both facilities are included in Chapter 2, Description of the Proposed Project, of the Draft EIR. Section 2.4.1 of the Draft EIR details the physical and operational components of the APM system (see pages 2-21 through 2-73); Section 2.4.3 of the Draft EIR details the individual elements of the CONRAC facility (see pages 2-109 through 2-129).

All impacts associated with the LAX Landside Access Modernization Program are discussed in the Draft EIR. The Draft EIR is available for review at the locations listed below. Review dates and times vary by location. The documents can also be viewed at www.connectinglax.com.

| | | |
|---|---|---|
| Westchester-Loyola Village Branch Library<br>7114 W. Manchester Avenue<br>Los Angeles, CA 90045 | Dr. Mary McLeod Bethune Regional Branch Library<br>3900 S. Western Avenue<br>Los Angeles, CA 90062 | Culver City Library<br>4975 Overland Avenue Culver City, CA 90230 |
| El Segundo Library<br>111 W. Mariposa Avenue<br>El Segundo, CA 90245 | Hawthorne Library<br>12700 Grevillea Avenue<br>Hawthorne, CA 90250 | Inglewood Library<br>101 W. Manchester Boulevard<br>Inglewood, CA 90301 |

## LAMP-PC00042 Sauschuck, Richard None Provided 10/31/2016

**LAMP-PC00042-1**

**Comment:** Thank you
were are the Car Rentals going to be?

**Response:** As part of the LAX Landside Access Modernization Program, LAWA intends to develop a new Consolidated Rental Car Facility (CONRAC). The proposed CONRAC would provide a centralized location for rental car agencies serving LAX. A CONRAC is a facility or complex that hosts multiple rental car agencies in one location. The CONRAC would be located on a 69-acre site in the northeast corner of Manchester Square. Specifically, the facility would be south of W. Arbor Vitae Street, west of S. La Cienega Boulevard (and just west of I-405), north of W. Century Boulevard, and east of Aviation Boulevard. As discussed in Section 2.4.3.1 in Chapter 2, Description of the Proposed Project, of the Draft EIR, the CONRAC would have a footprint of approximately 2.1 million sq. ft. with dimensions of 1,800 feet in length (north-south) and approximately 1,400 feet in width (east-west). Figure 2-38 in Chapter 2, Description of the Proposed Project, of the Draft EIR shows the location and proposed site plan for the CONRAC.

## LAMP-PC00043 Plukas, Andrew None Provided 11/1/2016

**LAMP-PC00043-1**

**Comment:** Put A Park where your planning to Move The Golf Course and Just as Big!!!

**Response:** The Westchester Golf Course is located within the LAX Northside Subarea[1] of the Airport property and is not located within the proposed Project site or part of the proposed Project. As indicated on page 4.8-29 in Section 4.8, Land Use and Planning, of the LAX Landside Access Modernization Program Project Draft EIR, the LAX Landside Access Modernization Program Project site does not extend into the LAX Northside Subarea. Further, as stated in the LAX Northside Plan Update EIR, "[t]he existing Westchester Golf Course would remain at its current location and configuration."[2]

[1] As stated on page 4.8-25 in Section 4.8, Land Use and Planning, of the LAX Landside Access Modernization Program Draft EIR, permitted uses in the LAX Northside Subarea would generally include community/civic, office/research and development, recreation/open space, commercial, airport support, and landscaped buffer. The development of the LAX Northside Subarea would allow a total floor area of 2.32 million square feet of commercial, recreational, and airport-related industrial land uses on approximately 340 acres.

[2] City of Los Angeles, Los Angeles World Airports, Draft Environmental Impact Report for Los Angeles International Airport (LAX) Northside Plan Update, May 2014, page 2-20. The Board of Airport Commissioners approved the LAX Northside Plan Update and certified the Final LAX Northside EIR on March 12, 2015.

## LAMP-PC00044 Klein, Ellen None Provided 11/1/2016

**LAMP-PC00044-1**

**Comment:** We like the program. Please keep surrounding community in mind as work starts.

**Response:** Please see Response to Comment LAMP-PC00021-11 which describes the Project Task Force that would be established to develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction of the proposed Project.

## LAMP-PC00045 Reno, M Debra None Provided 11/1/2016

**LAMP-PC00045-1**

**Comment:** Doubt anyone listens to locals – but would be good to know impacts on PDR & Westchester as well as property value devaluations

**Response:** The Draft EIR identifies and analyzes the proposed Project's physical environmental impacts, including impacts on surrounding neighborhoods and communities. In particular, Section 4.2 discusses and analyzes the potential air quality and human health risk effects of the proposed Project and Section 4.12 discusses and analyzes the potential off-Airport traffic impacts. As noted on Figure 2-2 in Chapter 2, Description of the Proposed Project, the proposed Project would affect areas directly east of LAX; it would not change or affect the number of aircraft

operations or any flight paths. A project's economic and social effects, including potential impacts on property values, are not treated as effects on the environment under CEQA. (See Section 15131(a) of the State CEQA Guidelines, stating "economic or social effects of a project shall not be treated as significant effects on the environment.") Although factors other than environmental impacts will be considered by the decision-makers, the purpose of an EIR is to focus on a project's physical environmental effects as required by CEQA. Accordingly, CEQA does not require an analysis of project impacts on property values.

## LAMP-PC00046 Mendola, Ildiko None Provided 11/2/2016

**LAMP-PC00046-1**

**Comment:** TO MUCH NOISE, TO MUCH FLYOVER TO CLOSE OR ABOVE HOUSES

**Response:** The LAX Landside Access Modernization Program addresses ground access improvements. The proposed Project would not cause any changes to aircraft operations; departures and arrivals runway utilization; or runway configuration. Therefore, noise from aircraft operations would not be affected by the proposed Project and was not addressed in the Draft EIR.

Los Angeles World Airports (LAWA) is committed to minimizing noise impacts in neighboring communities from aircraft operating at LAX. Since 1959, LAWA has developed and implemented noise abatement programs, sought partnership-based solutions and worked with stakeholders in a cooperative and collaborative manner. In particular, LAWA has worked proactively with the Federal Aviation Administration (FAA) for many years to implement various noise abatement procedures.

For more information about LAWA's noise abatement programs and related information, please go to www.lawa.org/laxnoise.

## LAMP-PC00047 Bergna, Louis None Provided 11/2/2016

**LAMP-PC00047-1**

**Comment:** Interested in the specific roadway improvements around the airport and when all the runway improvements will be complete

**Response:** The LAX Landside Access Modernization Program would include improvements to roadways serving the Central Terminal Area (CTA) and the new proposed Intermodal Transportation Facilities (ITFs) and Consolidated Rental Car Facility (CONRAC). Proposed improvements would include, among others, new roadway segments, additional lanes, realignment of segments of some existing roads, restriping, new or realigned driveways, roadway closures, streetscape improvements, landscaping, and intersection improvements. A summary of new roadways and roadway improvements included as part of the proposed Project is included in Table 2-7 on page 2-130 in Chapter 2, Description of the Proposed Project, of the Draft EIR. The locations of the roadway improvements for the proposed Project are shown on Figures 2-41, 2-42, and 2-43 in Chapter 2, Description of the Proposed Project, of the Draft EIR.

Construction of the proposed Project would occur in two separate phases. The first phase would be constructed over approximately 6 years, beginning at the end of 2017 and finishing in approximately 2023. Most of the roadway improvements to the east of the CTA would be completed within the first phase of construction (see page 2-181 and Figure 2-48 in Chapter 2, Description of the Proposed Project, of the Draft EIR). The second phase of construction would

mainly include the remaining roadway improvements at the intersection of Sepulveda Boulevard and W. Century Boulevard (see Figure 2-49). Construction of these elements would begin in approximately 2025 and be completed by approximately 2035.

The LAX Landside Access Modernization Program addresses ground access improvements. The proposed Project would not cause any changes to aircraft operations; departures and arrivals runway utilization; or runway configuration or runway improvements. LAWA completed runway improvements as part of the Runway 6R-24L Runway Safety Area project in late 2016 and is now implementing improvements as part of the Runway 7L-25R Runway Safety Area project. Table 3-1, in Chapter 3, Overview of Project Setting, of the Draft EIR lists the current and anticipated runway projects at LAX and their estimated timeframe.

## LAMP-PC00048 Charette, Ed None Provided 11/3/2016

**LAMP-PC00048-1**

**Comment:** How will LAMP affect traffic on Westchester Parkway?

**Response:** An analysis of the traffic-related impacts on area roadways, including Westchester Parkway, during construction and operation of the proposed LAX Landside Access Modernization Program is provided in Section 4.12.3, Construction Surface Transportation, and Section 4.12.2, Off-Airport Transportation, of the Draft EIR, respectively.

As discussed on page 4.12-47 of the Draft EIR, and described in more detail in Chapter 2, Description of the Proposed Project, of the Draft EIR, the proposed LAX Landside Access Modernization Program Project represents a major change in the ground access system used by passengers and employees to access LAX. The proposed Project consists of both physical improvements and transportation operating system policy changes affecting how people choose to access LAX. Physical improvements include development of an automated people mover (APM) system, Intermodal Transportation Facilities (ITFs), a consolidated rental car facility (CONRAC), pedestrian walkway connections to the passenger terminals within the Central Terminal Area (CTA), and roadway improvements. In addition, LAWA proposes to implement changes to its policies and procedures in regards to commercial vehicle operations and plans to establish and enhance programs to encourage airport and other employees to use alternative means of transportation. In addition, to the physical improvements and transportation operating system policy changes, the proposed Project includes Future Potential Related Development on land owned by LAWA located adjacent to the new proposed ground transportation facilities, as further described in Section 2.7 in Chapter 2, Description of the Proposed Project, of the Draft EIR.

**Traffic Impacts to Westchester Parkway During Project Construction**

The proposed construction haul routes for the LAX Landside Access Modernization Program are shown on Figure 2-50 in Chapter 2, Description of the Proposed Project, of the Draft EIR. As shown on the figure, the portion of Westchester Parkway between Airport Boulevard and Sepulveda Boulevard may be used as an alternative haul route during construction of the proposed Project. However, the primary haul routes, shown on Figure 4.12.3-3 in Section 4.12.3 of the Draft EIR, identify that most of the construction deliveries would occur via Aviation Boulevard and Century Boulevard to Airport Boulevard. Westchester Parkway would only be used for local trips and would not be a primary haul route. Construction of the proposed Project would occur between October 2017 through December 2035, with peak Project construction activities occurring in January 2020 and peak cumulative construction activities (i.e., construction traffic of the proposed LAX Landside Access Modernization Program plus traffic from construction

of other projects at/adjacent to LAX) occurring in November 2019 (see pages 4.12-193 and 4.12-220 of the Draft EIR).

As indicated on pages 4.12-204 and 4.12-205 of the Draft EIR, in order to determine the changes in traffic conditions that would result from the construction of the proposed Project, a total of 29 intersections were selected for analysis. Two of the 29 intersections evaluated include intersections along Westchester Parkway: Intersection 24. Westchester Parkway and Pershing Drive, and Intersection 25. Sepulveda Boulevard and Westchester Parkway.

As shown in Table 4.12.3-7 on page 4.12-233 of the Draft EIR, when comparing the peak Project traffic plus baseline (2015) traffic measured against the baseline, no significant impacts would occur at any of the 29 intersections evaluated, including Intersections 24 and 25.

As shown in Table 4.12.3-8 on page 4.12-236 of the Draft EIR, when comparing the peak cumulative traffic volumes with the baseline levels of service, Intersection 25. Sepulveda Boulevard and Westchester Parkway would experience a significant cumulative impact during both the a.m. and p.m. peak periods. However, as shown in Table 4.12.3-8, the contribution of the LAX Landside Access Modernization Program construction traffic to this significant cumulative impact would not be considerable and, therefore, no mitigation measures are required.

Please also note that, as specified in Section 4.12.3.8 of the Draft EIR, LAWA has proposed numerous mitigation measures that would reduce traffic impacts during construction of the proposed LAX Landside Access Modernization Program.

**Traffic Impacts to Westchester Parking During Project Operation**

As indicated on pages 4.12-47 through 4.12-54, in order to determine the changes in traffic conditions that would result from the ground access system improvements proposed under the proposed Project, a total of 183 intersections were selected for analysis. Five of the 183 intersections evaluated include intersections along Westchester Parkway: Intersection 8. Pershing Drive and Westchester Parkway, Intersection 63. Sepulveda Boulevard and Westchester Parkway, Intersection 75. Sepulveda Eastway and Westchester Parkway, Intersection 77. Jenny Avenue and Westchester Parkway, and Intersection 81. Airport Boulevard and Arbor Vitae Street/Westchester Parkway.

As shown in Table 4.12.2-16 on pages 4.12-99 through 4.12-101 of the Draft EIR, under the 2015 With Project scenario, no significant impacts would occur at any of these five intersections. Similarly, as shown in Table 4.12.2-18 on pages 4.12-113 through 4.12-115, under the 2024 Future With Project compared to 2024 Without Project scenario, no significant impacts would occur at any of these five intersections. Further, the intersection level of service (LOS) with the proposed Project in 2024 would improve at Intersection 63. Sepulveda Boulevard and Westchester Parkway during the midday and p.m. peak periods and at Intersection 81. Airport Boulevard and Arbor Vitae Street/Westchester Parkway during the p.m. peak period.

As shown in Table 4.12.2-20 on pages 4.12-125 through 4.12-127 under the 2035 Future With Project compared to 2035 Without Project scenario, no significant impacts would occur at any of the five intersections. Further, the intersection LOS with the proposed Project in 2035 would improve at Intersection 81. Airport Boulevard and Arbor Vitae Street/Westchester Parkway during the midday and p.m. peak periods.

As shown in Table 4.12.2-31 on pages 4.12-155 through 4.12-157 under the 2035 Future With Project and Potential Future Related Development compared to 2035 Without Project scenario, there would be one significant impact: at Intersection 63. Sepulveda Boulevard and Westchester

Parkway during the a.m. peak period. Further, the intersection LOS with the proposed Project and Potential Future Related Development in 2035 would improve at Intersection 81. Airport Boulevard and Arbor Vitae Street/Westchester Parkway during the midday and p.m. peak periods.

To address the significant impact at Intersection 63. Sepulveda Boulevard and Westchester Parkway during the a.m. peak period, LAWA has proposed Mitigation Measure MM-ST (LAMP)-8 which includes signal system upgrades via installation of Closed Circuit TV (CCTV) cameras at various intersections where significant impacts would occur, including Intersection 63 (see page 4.12-181 of the Draft EIR). As shown in Table 4.12.2-40 on page 4.12-191 of the Draft EIR, implementation of Mitigation Measure MM-ST (LAMP)-8 would reduce the impact at Intersection 63 during the a.m. peak period to a level that is less than significant.

## LAMP-PC00049 Morrison, Michael None Provided 11/3/2016

**LAMP-PC00049-1**

**Comment:** I support any effort to improve LAX and bring it up to world class standards (SIN, ICN, HRG, NRT, etc.)

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

## LAMP-PC00050 Pastores, Gabriela None Provided 11/4/2016

**LAMP-PC00050-1**

**Comment:** I WORK IN TBIT/LAX. MOST PASSENGERS COMPLAIN ABOUT THE DIFFICULTY OF GETTING INTO LAX. THIS SHOULD BE ADDRESSED IMMEDIATELY.

**Response:** The proposed Project is a transportation improvement project involving provision of consolidated facilities connected to and from the Central Terminal Area by an Automated People Mover system offering time-certain travel and roadway improvements. With the Project, as shown in Tables 19-21 of Appendix O, the net vehicular trip generation during peak periods would be reduced in comparison to conditions without the Project. Thus, the proposed Project would ease congestion and improve access to LAX.

## LAMP-PC00051 Scott, Mel None Provided 11/5/2016

**LAMP-PC00051-1**

**Comment:** Do whatever it takes to resolve the traffic nightmare of LAX. I live 5 mins away & am ready to use Burbank.

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

## LAMP-PC00052 Brunelle, Belinda None Provided 11/7/2016

**LAMP-PC00052-1**

**Comment:** The website info and drawings are extremely helpful.

**Response:** No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Landside Access Modernization Program Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

## LAMP-PC00053 Gibbs, Paul Crowne Plaza Los Angeles Int'l Airport 11/15/2016

**LAMP-PC00053-1**

**Comment:** We are submitting this comment letter to Los Angeles World Airports ("LAWA") regarding the above-referenced Draft Environmental Impact Report ("DEIR") for the Landside Access Modernization Program ("LAMP").

The Crowne Plaza Los Angeles International Airport is located in the "Landside" area, at *5985 West Century Boulevard*.

We have concerns about and provide comments on the following issue:

Shuttle Issues:

We currently operate a shuttle into the Central Terminal Area ("CTA") to serve our customers and guests. Under the EIR with the implementation of "LAMP," it appears that we will no longer be allowed to pick up and drop off in the CTA, but instead will be limited to the Intermodal Transportation Facility West ("ITF West").

If the goal under LAMP implementation is to restrict vehicles within the CTA to reduce traffic congestion, it seems contrary to common sense that our shuttle buses - which hold scores of passengers - would be restricted from CTA access, while private cars, taxis, Lyft, Uber, limousines, which often carry only one or two passengers, would still be allowed access to the CTA.

Our comment and request is that LAWA reconsider this restriction to our shuttle access to the CTA under the LAMP implementation. Our shuttles are "aggregators" of passengers, whereas taxis, Lyft, Uber and limousines typically transport only one or two passengers per trip.

**Response:** The comment is the same as comment LAMP-PC00024-1; please refer to Response to Comment LAMP-PC00024-1.

**LAMP-PC00053-2**

**Comment:** In the EIR's Table 17 of Appendix O of the Off-Airport Traffic Study, the table contains vehicle occupancy numbers during peak travel times that appear to be too low. Our shuttles are quite full during peak travel periods, despite what Table 17 reflects. Our comment and request is that LAWA re-examine these vehicle occupancy assumptions for shuttles during peak periods, and clarify or correct Table 17, which appears to be flawed.

**Response:** The comment is identical to comment LAMP-PC00024-2; please refer to Response to Comment LAMP-PC00024-2.

**LAMP-PC00053-3**

**Comment:** The EIR indicates that private shuttles must *only* use the ITF West. Our comment and request is that private shuttles be allowed access to both of the ITFs, as well as to the CTA. If the goal is to reduce traffic congestion, then if one facility is full or congested, the shuttle buses should be allowed the flexibility of dropping off and picking up at any of these facilities.

**Response:** The comment is identical to comment LAMP-PC00024-3; please refer to Response to Comment LAMP-PC00024-3.

## LAMP-PC00054 Bassett, Charles A. L&R Group of Companies 11/15/2016

**LAMP-PC00054-1**

**Comment:** We are submitting this comment letter to Los Angeles World Airports ("LAWA") regarding the above-referenced Draft Environmental Impact Report ("DEIR") for the Landside Access Modernization Program ("LAMP").

Our properties are located in the "Landside" area, at the addresses listed below.

- WallyPark, 9700 Bellanca Avenue, Los Angeles, CA 90045
- Airport Center, 5959 West Century Blvd., Los Angeles, CA 90045
- Joe's Airport Parking, 6151 West Century Blvd., Los Angeles, CA 90045
- WallyPark Express, 9600 South Sepulveda Blvd., Los Angeles, CA 90045

We have concerns about and provide comments on these issues:

Shuttle Issues:

We currently operate a shuttle into the Central Terminal Area ("CTA") to serve our customers and guests. Under the EIR with the implementation of "LAMP," it appears that we will no longer be allowed to pick up and drop off in the CTA, but instead will be limited to the Intermodal Transportation Facility West ("ITF West").

If the goal under LAMP implementation is to restrict vehicles within the CTA to reduce traffic congestion, it seems contrary to common sense that our shuttle buses – which hold scores of passengers - would be restricted from CTA access, while private cars, taxis, Lyft, Uber, limousines, which often carry only one or two passengers, would still be allowed access to the CTA.

Our comment and request is that LAWA reconsider this restriction to our shuttle access to the CTA under the LAMP implementation. Our shuttles are "aggregators" of passengers, whereas taxis, Lyft, Uber and limousines typically transport only one or two passengers per trip.

**Response:** The comment is the same as comment LAMP-PC00024-1; please refer to Response to Comment LAMP-PC00024-1.

**LAMP-PC00054-2**

**Comment:** In the EIR's Table 17 of Appendix O of the Off-Airport Traffic Study, the table contains vehicle occupancy numbers during peak travel times that appear to be too low. Our shuttles are quite full during peak travel periods, despite what Table 17 reflects. Our comment and request is that LAWA re-examine these vehicle occupancy assumptions for shuttles during peak periods, and clarify or correct Table 17, which appears to be flawed.

**Response:** The comment is identical to comment LAMP-PC00024-2; please refer to Response to Comment LAMP-PC00024-2.

**LAMP-PC00054-3**

**Comment:** The EIR indicates that private shuttles must *only* use the ITF West. Our comment and request is that private shuttles be allowed access to both of the ITFs, as well as to the CTA. If the goal is to reduce traffic congestion, then if one facility is full or congested, the shuttle buses should be allowed the flexibility of dropping off and picking up at any of these facilities.

**Response:** The comment is identical to comment LAMP-PC00024-3; please refer to Response to Comment LAMP-PC00024-3.

## LAMP-PC00055 Milliron, Hayden None Provided 11/29/2016

**LAMP-PC00055-1**

**Comment:** I understand that for the Landside Access Modernization Program project, CEQA clearance is scheduled for Fourth Quarter 2016 and NEPA clearance is scheduled for Third Quarter 2017. When are acquisitions expected to begin for this project? If there is a better contact for this information, please let me know.

**Response:** Acquisition of property and relocation of residents by federally-funded airports such as LAX is governed by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (codified as amended at 42 USC 4601-4655), its implementing regulations (49 CFR Part 24), and FAA Order 5100.37B Land Acquisition and Relocation Assistance for Airport Projects. The statute and its implementing regulations are referred to jointly as the Uniform Act.

Section 2.5.19 in Chapter 2, Description of the Proposed Project, of the Draft EIR discusses the existing relocation program for the Manchester Square area, part of the Aircraft Noise Mitigation Program (ANMP) Relocation Plan for the Belford and Manchester Square areas. The ANMP would continue with or without implementation of the proposed Project. As noted on page 4.10-30 in Section 4.10, Population and Housing, of the Draft EIR, if the land acquisition under the existing ANMP Relocation Plan for the Belford and Manchester Square areas is not completed by commencement of construction of the proposed Project, LAWA and the City of Los Angeles may be required to exercise the use of eminent domain to acquire these remaining properties. The acquisition of these properties would displace existing housing, but would be done so in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as well as California Government Code §7260, which establishes a uniform policy for the fair and equitable treatment of persons displaced as a direct result of programs or projects undertaken by a public entity. Note that the relocation of remaining Belford and Manchester Square residents would not displace substantial numbers of people that would necessitate the construction of replacement housing elsewhere. Impacts would be less than significant.

LAWA will continue its efforts to acquire the property located in the Belford and Manchester Square areas that are needed for the LAX Landside Access Modernization Program under the voluntary ANMP. Figure 2-47 in Chapter 2, Description of the Proposed Project, shows the property to be acquired for the proposed Project. Property located outside of the Belford and Manchester Square areas would be required for portions of the APM right-of-way and some roadway improvements. LAWA would acquire these properties after CEQA and NEPA approvals are obtained (scheduled for the end of 2017). At the time of Final EIR preparation, the schedule for CEQA clearance was the first quarter of 2017 and for NEPA clearance the fourth quarter of 2017.

## LAMP-PC00056 Capo, Helen None Provided 11/14/2016

**LAMP-PC00056-1**

**Comment:** How will this effect/affect El Segundo?

**Response:** All impacts associated with the LAX Landside Access Modernization Program, including those on neighboring communities such as El Segundo, are discussed in the Draft EIR. The Draft EIR is available for review at the locations listed below. Review dates and times vary by location. The documents can also be reviewed at www.connectinglax.com.

| | | |
|---|---|---|
| Westchester-Loyola Village Branch Library<br>7114 W. Manchester Avenue<br>Los Angeles, CA 90045 | Dr. Mary McLeod Bethune Regional Branch Library<br>3900 S. Western Avenue<br>Los Angeles, CA 90062 | Culver City Library<br>4975 Overland Avenue Culver City, CA 90230 |
| El Segundo Library<br>111 W. Mariposa Avenue<br>El Segundo, CA 90245 | Hawthorne Library<br>12700 Grevillea Avenue<br>Hawthorne, CA 90250 | Inglewood Library<br>101 W. Manchester Boulevard<br>Inglewood, CA 90301 |

Please also see responses to comments for the comment letter LAMP-AL00008, submitted by Shute, Mihaly & Weinberger on behalf of the City of El Segundo.

## LAMP-PC00057 Guzman, Debra None Provided 11/18/2016

**LAMP-PC00057-1**

**Comment:** I hope this will not add more noise & congestion to the neighborhood.

**Response:** The underlying purposes of the LAX Landside Access Modernization Program are to improve access to LAX and relieve congestion on Airport and surrounding roadways, including local neighborhoods. The Project would relieve congestion by developing a flexible transportation system that provides alternatives to the Central Terminal Area (CTA) for passengers, airport and other employees, and airport-related vendors accessing LAX. See Section 4.13 of the Draft EIR for a full evaluation of traffic impacts.

Operational and construction noise impacts, including road traffic noise, construction traffic and equipment noise and vibration, and transit noise and vibration, were evaluated in Section 4.9 of the Draft EIR. The proposed Project addresses ground access improvements and would not cause any changes to aircraft operations; departures and arrivals runway utilization; or runway

configuration. Therefore, noise from aircraft operations would not be affected by the proposed Project and was not addressed in the Draft EIR.

## LAMP-PC00058 Paquin, Wendy None Provided 11/12/2016

**LAMP-PC00058-1**

**Comment:** I live extremely close to the north side of LAX facing the golf course to the west. I am being pushed out of my home because the noise is now unbearable.

**Response:** Please see Response to Comment LAMP-PC00037-1 for a discussion on the noise factors and the analysis of potential noise impacts north of the Airport that were included in the Draft EIR.

The LAX Landside Access Modernization Program addresses ground access improvements. The proposed Project would not cause any changes to aircraft operations; departures and arrivals runway utilization; or runway configuration. Therefore, noise from aircraft operations would not be affected by the proposed Project and was not addressed in the Draft EIR.

Los Angeles World Airports (LAWA) is committed to minimizing noise impacts in neighboring communities from aircraft operating at LAX. Since 1959, LAWA has developed and implemented noise abatement programs, sought partnership-based solutions and worked with stakeholders in a cooperative and collaborative manner. In particular, LAWA has worked proactively with the Federal Aviation Administration (FAA) for many years to implement various noise abatement procedures.

For more information about LAWA's noise abatement programs and related information, please go to www.lawa.org/laxnoise.

## LAMP-PC00059 Moore, William None Provided 11/15/2016

**LAMP-PC00059-1**

**Comment:** Would like to learn more about traffic mitigation on Sepulveda and Century Blvd 2 level traffic.

**Response:** Section 2.4.4 of the Draft EIR provides a detailed description of the transportation system improvement at the Sepulveda Boulevard and Century Boulevard two-level interchange. Table 2-7 in Section 2.4.4 of the DEIR provides a listing of the various changes proposed to the access and circulation system at the subject interchange. Figure 2-41 in the Draft EIR provides a graphical representation of the changes that would occur at the Sepulveda and Century interchange providing access and egress opportunities for Airport traffic. It is recommended that each movement into and out of the Central Terminal Area (CTA) via Century Boulevard and Sepulveda Boulevard ramps be followed in the Figure 2-41 to get a complete understanding of the changes proposed as part of the LAX Landside Access Modernization Program Project.

The improvements proposed would substantially improve the traffic flow along Sepulveda Boulevard, particularly in the tunnel as well as within the CTA where the signalized intersection at World Way and Center Way would be removed and a number of at-grade signalized pedestrian crossings at the arrival level (lower level) roadway would be reduced. The ramps to and from Sepulveda Boulevard and Century Boulevard would be re-configured to reduce the number of conflicts, weaving and merges and traffic would be able to flow smoothly with these improvements.

# 3. Corrections and Additions to the Draft EIR

## 3.1 Introduction

As provided in the State CEQA Guidelines § 15088(d), responses to comments may take the form of a revision to a Draft EIR or may be a separate section in the Final EIR. This chapter complies with the latter of these two guidelines and provides changes as a result of clarifications to, and comments received on, the Draft EIR for the LAX Landside Access Modernization Program. In addition, it includes minor revisions to the Draft EIR resulting from minor corrections or updates to Draft EIR information. The following revisions are hereby made to the text of the Draft EIR. Changes in the text are signified by strikeouts where text is removed and shown with italics and underline where text is added, unless otherwise noted. These changes do not add significant new information to the EIR that would require Draft EIR recirculation under State CEQA Guidelines Section 15088.5. For example, they do not disclose or suggest new or substantially more severe significant environmental impacts of the proposed Project, or a new feasible mitigation measure or alternative considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed Project's significant effects.

## 3.2 Corrections and Additions to the Draft EIR

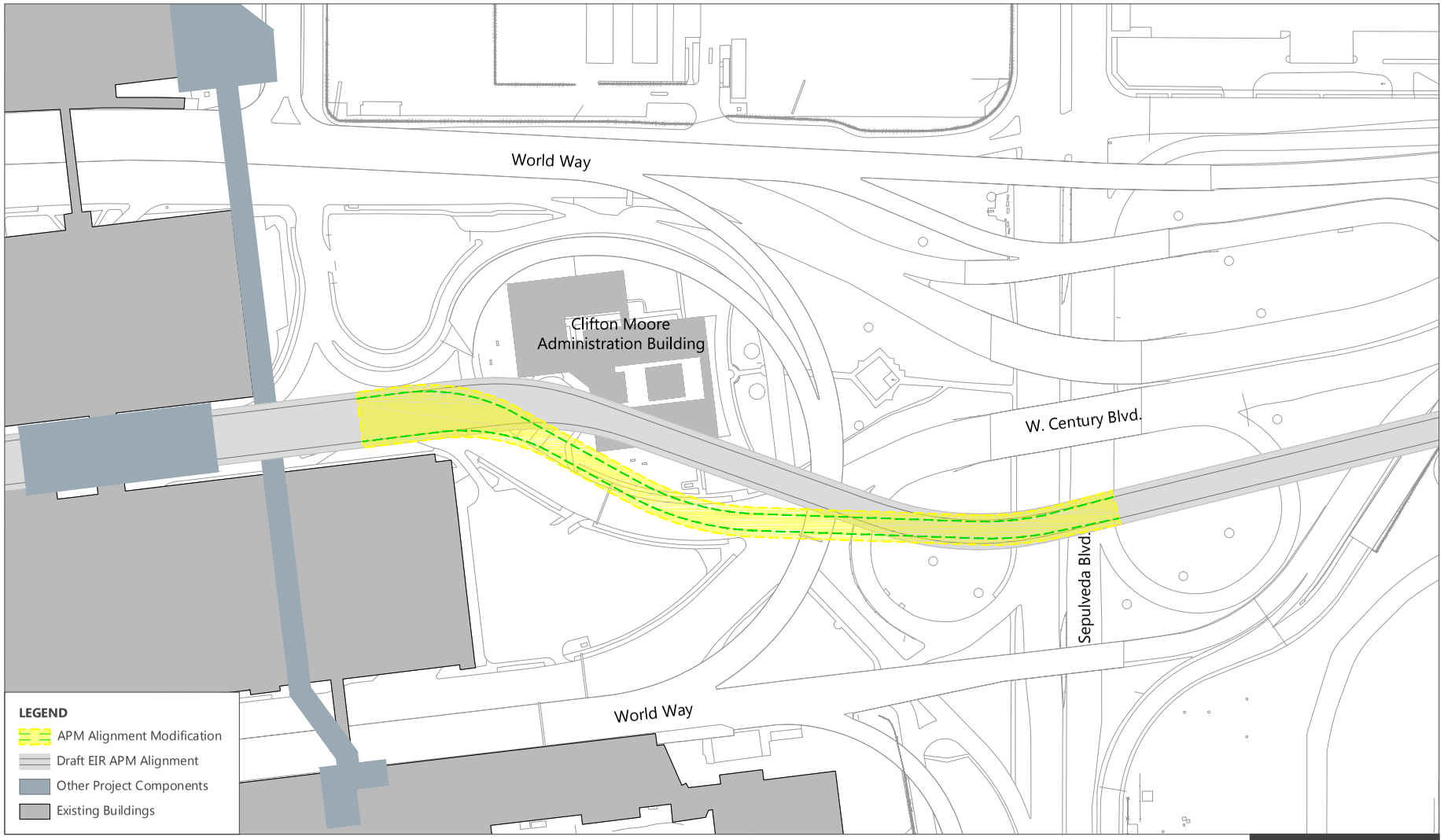
### General Corrections

1. The Draft EIR references the Los Angeles County Metropolitan Transportation Authority (Metro) rail lines in the vicinity of LAX. This reference was always intended to be inclusive and representative of both the Crenshaw/LAX Line and the Metro Green Line. This correction applies on the following pages of the Draft EIR: 1-5, 2-4, 2-25, 2-90, 4.1-11, 4.2-69, 4.8-47, 4.12-6. Specific text revisions have been identified in the respective Draft EIR section headings below.

2. Continuing planning efforts since the release of the Draft EIR has resulted in a proposed shift of the APM alignment. As shown in **Figure 1**, an approximately 1,000-foot segment of the APM guideway, generally between Sky Way and Sepulveda Boulevard, would be shifted approximately 85 feet to the south to avoid demolition of the Clifton Moore Administration Building.[1] The minor shift to the APM alignment, as well as the delayed demolition of the Clifton Moore Administration Building would not substantially change any of the analyses or conclusions with respect to aesthetics, cultural resources, hazards and hazardous materials, hydrology, land use and planning, public services, or traffic (on-Airport, off-Airport, and construction surface traffic), or utilities. Similarly, results to the air quality, human health risk assessment, and greenhouse gas emissions analyses would not substantially change as construction of the APM and demolition of the Clifton Moore Administration Building would still occur, and therefore has been accounted for in the analyses. Transit noise as a result of the APM alignment shift would not materially change as the APM guideway would be shifted away from the closest noise-sensitive receptor (the Hyatt Regency Los Angeles International Airport located at 6225 W. Century Boulevard). Therefore, the new proposed geometry for the APM alignment, as well as the delayed demolition of the Clifton Moore Administration Building would not impact any new existing or proposed facilities, or result in any new or more severe significant impacts. The proposed APM alignment shift would apply to Figures 1-2, 2-3, 2-4, 2-5, 2-41, 2-48, 2-55, 4.1-25, 4.1-26, 4.7-4, 4.7-9, 4.7-10, 4.9.4-2, 5-4, and 5-7 of the Draft EIR. The APM modification would also apply to the applicable figures within the appendices.

3. To address the South Coast Air Quality Management District (SCAQMD) comment letter on the Draft EIR (Comment LAMP-AR00001), as well as correct an assumption regarding parking structures in the modeling, assumptions for air quality, human health risk assessment, and greenhouse gas emissions were modified and the analyses were updated. Corrected assumptions, calculations, and results have been identified in the respective Draft EIR section headings below (see corrections to Section 4.2.1, Air Quality, Section 4.2.2, Human Health Risk Assessment, and Section 4.5, Greenhouse Gas Emissions). Updated calculations and assumptions are also identified in Appendix F and included in **Attachment 2**. These corrections would not result in any new or more severe significant impacts. In fact, Project-related localized constructions impacts to $PM_{10}$ (24-hour) would be reduced to a level that is less than significant (see revised Table 4.2.1-27 below).

[1] Demolition of the Clifton Moore Administration Building is still anticipated as part of the proposed Project in conjunction with the roadway improvements under Phase 2. Therefore, the phasing for this enabling project would be shifted from Phase 1 to Phase 2.




NOTE: Improvements depicted are conceptual only and do not represent engineered design.
SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016.
PREPARED BY: Ricondo & Associates, Inc., February 2017.

NORTH 0 200 ft.

**FIGURE 1**

## APM Alignment Modification

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## Chapter 1 Introduction and Executive Summary

1. The first sentence of the third paragraph under the heading 1.1.1.2 Proposed LAX Landside Access Modernization Program on page 1-5 of the Draft EIR is hereby revised as follows:

   Metro is independently working on a connection to the airport along the Metro Crenshaw/LAX light rail line *and the Metro Green Line* at their proposed Airport Metro Connector (AMC) 96th Street Transit Station to be located at Aviation Boulevard and 96th Street, about 1.5 miles east of the entry to the CTA.

2. The following bullet is hereby added under the heading Section 1.1.4 Project Characteristics on page 1-11 of the Draft EIR:

   - *Amendments to plans regulating land use in the area, including the City of Los Angeles General Plan and the LAX Specific Plan, zone changes, and the reconfiguration of existing parcels.*

3. The third sentence of the first paragraph under the heading 1.4.1.4 Cultural Resources on page 1-24 of the Draft EIR is hereby revised as follows:

   However, as discussed in Section 4.4, *Cultural Resources*, Mitigation Measure ~~LAX~~ *MM*-HR (LAMP)-1, Preservation of Historic Resources: Theme Building and Setting, would be implemented to guide the preservation and future use of the Theme Building and to ensure that it is visually distinguished from the proposed new construction to maximize its level of visual prominence in the CTA.

4. The seventh sentence of the first paragraph under the heading 1.4.1.11.3 Schools on page 1-30 of the Draft EIR is hereby revised as follows:

   However, LAWA would implement mitigation measure ~~LAX~~ *MM*-PS (LAMP)-1 – School Relocations, to provide moving assistance to these two schools as part of any relocation effort.

5. The second line under the heading **Air Quality** in Table 1-3 on page 1-34 of the Draft EIR is hereby revised as follows:

**Table 1-3: (1 of 2) Significant Impacts of the Potential Future Related Development**

| RESOURCE CATEGORY | PROPOSED PROGRAM (BEFORE MITIGATION) | PROPOSED MITIGATION? | PROPOSED PROGRAM (AFTER MITIGATION) |
|---|---|---|---|
| **Aesthetics** | | | |
| Visual Character | Less than Significant | No | Less than Significant |
| Shading | Less than Significant | No | Less than Significant |
| Light and Glare | Less than Significant | No | Less than Significant |
| | | | |
| **Air Quality** | | | |
| Construction | Significant ($NO_x$) | Yes | Less than Significant |
| Operations | Significant (VOC~~,~~ *and* $NO_x$~~, and $PM_{10}$~~) | Yes | Significant (VOC~~,~~ *and* NOx~~, and $PM_{10}$~~) |

6. The text under the heading 1.4.2.2.1 Air Quality on page 1-36 of the Draft EIR is hereby revised as follows:

   Section 4.2, *Air Quality and Human Health Risk*, examines air quality emissions that would result from construction and operations associated with the potential future related development. Prior to mitigation, the potential future related development would result in the following significant impacts:

   - Construction-related regional emissions of $NO_X$.
   - ~~Operations-related local concentrations of $PM_{10}$.~~
   - Operations-related regional emissions of VOC, and $NO_X$.
   - *Based on the regional emissions analysis, the potential future related development would exceed operations-related local concentrations thresholds for several pollutants.*

7. The first bullet on page 1-37 of the Draft EIR is hereby revised as follows:

   - Operations-related regional emissions of VOC~~,~~ *and* $NO_X$~~, and $PM_{10}$~~.

## Chapter 2 Description of the Proposed Project

1. The second sentence of the first paragraph under the 2.1.2 PROPOSED LAX LANDSIDE ACCESS MODERNIZATION PROGRAM heading on page 2-4 of the Draft EIR is hereby revised as follows:

   The LAX Landside Access Modernization Program ("Project") seeks to improve access options and the travel experience for passengers; shift the location where different modes of traffic operate within the CTA and on the surrounding street network; and provide a direct connection to the Metro *Crenshaw/LAX Line and Green Line* ~~rail~~ and *Metro* transit system.

2. The following bullet is hereby added under the heading Section 2.4 Project Characteristics on page 2-13 of the Draft EIR:

   - *Amendments to plans regulating land use in the area, including the City of Los Angeles General Plan and the LAX Specific Plan, zone changes, and the reconfiguration of existing parcels.*

3. The second sentence of the first paragraph on page 2-25 of the Draft EIR is hereby revised as follows:

   The station at the ITF East would provide a connection to the Metro rail *system, including the Crenshaw/LAX and Green Lines,* and bus transit systems at the proposed Metro AMC 96th Street Transit Station, an adjacent multi-modal/transit facility Metro proposes to construct at W. 96th Street/Aviation Boulevard.

4. The first paragraph under the 2.4.1.2.2 Stations, Pedestrian Walkways, and Vertical Circulation Cores heading on page 2-33 of the Draft EIR is hereby revised as follows:

Six stations would provide access to the APM: three within the CTA and three east of the CTA. Of the three stations located east of the CTA, two stations would serve the ITFs and associated ground transportation elements, and one station would serve the CONRAC; these APM stations are discussed with their associated facility (Section 2.4.2 for the ITFs and Section 2.4.3 for the CONRAC). *Although the proposed Project includes plans for six APM stations, it does not preclude additional APM stations in the future.*

5. The first sentence of the second paragraph on page 2-53 of the Draft EIR is hereby revised as follows:

   Approximately 25-foot-wide single-level pedestrian walkways would connect the Center CTA APM Station to Terminals 2, *3,* 5, and 6.

6. The fifth sentence of the second paragraph under the 2.4.2.2 ITF East heading on page 2-90 of the Draft EIR is hereby revised as follows:

   The proposed Metro AMC 96th Street Transit Station and the ITF East APM Station would be connected to each other via vertical circulation elements and would provide a seamless connection between the APM and the Metro rail *system, including the Crenshaw/LAX and Green Lines,* and bus transit system (see Figure 2-31).

7. Based on comments received on the Draft EIR, the proposed Project will now avoid demolition of Vicksburg Avenue between W. 98th Street and W. 96th Street. Instead, Vicksburg Avenue, south of W. 96th Street would be closed and converted to a cul-de-sac. This change would allow for continued access into properties adjacent to Project-related improvements. The change to this roadway would not substantially change any of the analyses or conclusions with respect to air quality, aesthetics, cultural resources, hazards and hazardous materials, human health risk assessment, hydrology, greenhouse gas emissions, land use and planning, noise, public services, traffic (on-Airport, off-Airport, and construction surface traffic), or utilities, or result in any new or more severe significant impacts.. To reflect these changes, the roadway improvement for Map Key ID #10 in Table 2-7 on page 2-130 of the Draft EIR is hereby revised as follows:

| | | |
|---|---|---|
| 10 | Vicksburg Avenue *Cul-de-Sac* ~~Demolition~~ | ~~Closure and demolition of~~ Vicksburg Avenue ~~between W. 98th Street and~~ *south of* W. 96th Street *would be closed and converted to a cul-de-sac*. |

8. Figure 2-41: Roadway Improvements – Central Terminal Area on page 2-133 of the Draft EIR is hereby revised to change the roadway improvement to Vicksburg Avenue between W. 96th Street and W. 98th Street (Map Key ID #10) per the correction above. Please see the following revised figure. This correction also applies to the following figures: 2-49, 4.12.1-7, 5-4, and 5-6.

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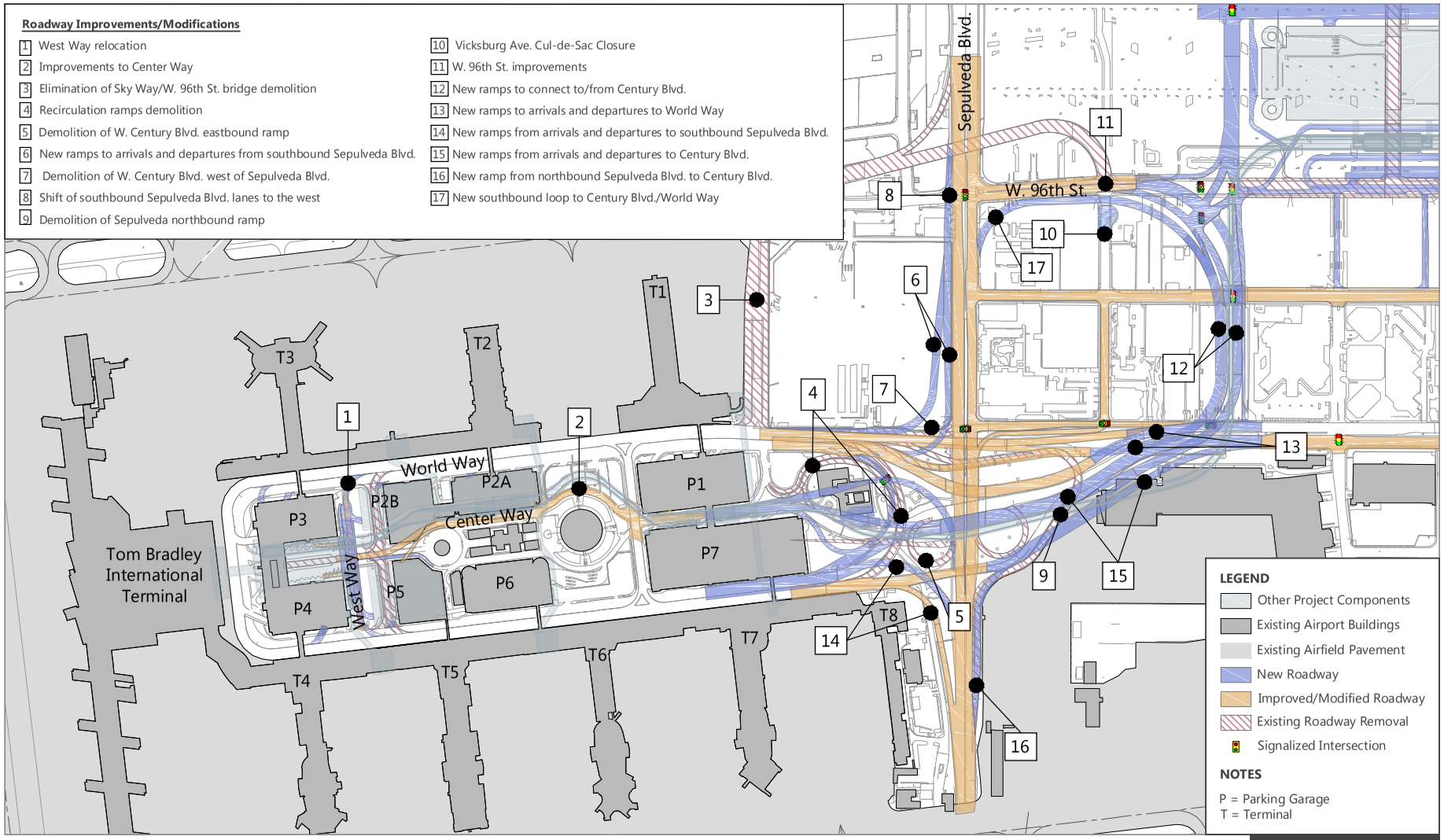


NOTE: Improvements depicted are conceptual only and do not represent engineered design.
SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016.
PREPARED BY: Ricondo & Associates, Inc., September 2016.

**FIGURE 2-41**

## Roadway Improvements
## Central Terminal Area

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9. The following text has hereby been added after the second paragraph on page 2-139 of the Draft EIR:

> *Additionally, LAWA will work with the Los Angeles Community College District regarding concerns of access to the West Los Angeles College (WLAC) property located at 9700 S. Sepulveda Boulevard. Access to the WLAC property would remain unchanged during Phase 1 of the proposed Project. With the proposed Project Phase 2 components, access to the WLAC property would continue to be off of 98th Street (both east and west); access to the adjacent lot would be provided off of 98th Street and Vicksburg Avenue. Specifics relative to access and circulation associated with the WLAC property would be coordinated at the time of final design when details relative to exact alignment, etc., would be available. Detailed coordination with landowners relative to site access and circulation considerations, both during construction and post-construction, would be conducted at the time of final design of the new roadways and facilities.*

10. Table 2-8: Project Dimensions for Streets (Page 2 of 2) on page 2-141 of the Draft EIR has been revised. Please see the following revised table.

11. Figure 2-44: Enabling Projects on page 2-151 of the Draft EIR is hereby revised to change the removal of Vicksburg Avenue between W. 96th Street and W. 98th Street (Map Key ID #15). Please see the following revised figure.

12. The second sentence of the paragraph under the heading 2.5.2 DEMOLITION OF THE CLIFTON MOORE ADMINISTRATION BUILDING on page 2-153 of the Draft EIR is hereby revised as follows:

> This two-story facility has a footprint of approximately 34,200 sq. ft. and ~~is located within the footprint of the proposed APM guideway. Therefore, this facility~~ would need to be demolished to enable construction *of Phase 2 roadway improvements under* the proposed Project.

13. The fourth sentence of the paragraph under the heading 2.5.5 DEMOLITION OF LAX CITY BUS CENTER on page 2-154 of the Draft EIR is hereby revised as follows:

> While some public transit buses would continue to board/de-board passengers in the vicinity of the ITF West, the primary functions of this facility would be relocated adjacent to Metro's ~~Aviation/Century Boulevard Station on the Metro~~ Crenshaw/LAX Line, currently under construction, adjacent to the proposed Metro AMC 96th Street Transit Station.

14. Figure 2-47: Properties to be Acquired on page 2-165 of the Draft EIR is hereby revised to indicate that the location of the Southwestern Metro Yard is for future Metro facilities. Please see the following revised figure.

## Table 2-8 (2 of 2): Project Dimensions for Streets

| | CURRENT DIMENSIONS[1/] (TYPICAL) | | | ~~PROPOSED~~ DESIGNATION PER CITY OF LOS ANGELES MOBILITY ~~ELEMENT~~ *PLAN* 2035[4/] | ~~PROPOSED~~ DIMENSIONS PER MOBILITY ~~ELEMENT~~ *PLAN* 2035[4/] ~~PROPOSED PER STREETSCAPE PLAN~~ | | | PROPOSED DIMENSIONS PER LAX LANDSIDE ACCESS MODERNIZATION PROGRAM ROADWAY PLAN | | |
|---|---|---|---|---|---|---|---|---|---|---|
| **STREET NAME** | **SIDEWALK[2/]** | **ROADWAY[3/]** | **ROW** | **(LAX DESIGN GUIDELINES PROPOSED DESIGNATION)** | **SIDEWALK[2/]** | **ROADWAY** | **ROW** | **SIDEWALK[2/]** | **ROADWAY[3/]** | **ROW[6/ 7/]** |
| ARBOR VITAE STREET<br>Aviation Blvd. to La Cienega Blvd. | 10′ | 55′<br>(excludes frontage road) | 75′ to 115′ | Boulevard II (Modified) | 15′ | 80′ | 110′ | 10′ to 25′[6/] | 80′ | 105′ |
| NEW 'A' STREET<br>98th St. to Westchester Parkway | N/A | N/A | N/A | New Street - (Avenue I) | N/A | N/A | N/A | 15′ | 70′ | 100′ |
| AIRPORT BLVD.<br>98th St. to W. Arbor Vitae St. | 10′ to 16′ West<br>10′ East | 72′ | 98′ | Boulevard II (Modified) | 15′ | 80′ | 110′ | 18′ | 104′ | 140′ |
| AVIATION BLVD.<br>98th St. to W. Arbor Vitae St. | 12′ | 102′ | 126′ | Boulevard II (Modified) | 15′ | 80′ | 110′ | ~~12′~~ *17′* to *24′* ~~25′~~ | 83′ to 89′ | 120′ to 129′ |

NOTES:

1/ The range indicated is the range of existing dimensions. All dimensions are approximate and should be field verified and should not be used for engineering purposes. City of Los Angeles, Department of Transportation signing and striping plans, GIS parcel maps, and Google aerials were used for pavement, sidewalk/pavement widths, and right-of-way.

2/ Includes both sidewalk and tree well or parkway area.

3/ Includes landscaped median.

4/ Adopted January 20, 2016.

5/ Includes 28′ frontage road and 4′ raised island.

6/ Easements required.

7/ Excluding easements.

SOURCE: MapLAX, July 2016.

PREPARED BY: Ricondo & Associates, Inc., August 2016*, as revised February 2017*.

**Facilities to be Removed**

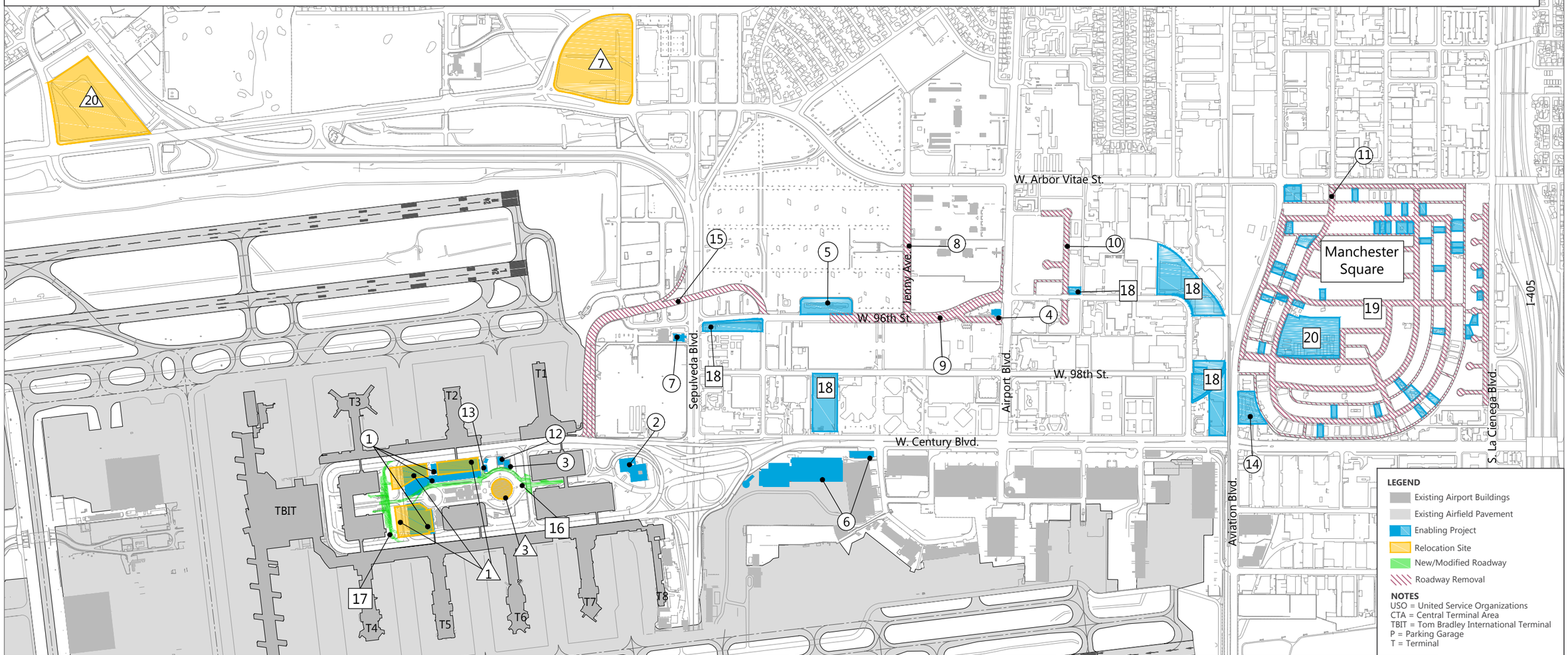
1. Parking garages P2A, P2B, and P5
2. Clifton Moore Administration Building (Admin East)
3. Bob Hope Hollywood USO
4. Restaurant building
5. LAX City Bus Center
6. Hangar Complex
7. Reliant Medical Center
8. Jenny Ave.
9. 96th Street between Vicksburg Ave. and Airport Blvd.
10. Belford Area secondary roadways
11. Manchester Square secondary roadways
12. Drug Enforcement Adminstration Building
13. Operations Trailers
14. Travelodge
15. SkyWay / 96th Street Bridge

**Facility Relocation Sites**

1. Replacement garages in CTA
3. Bob Hope Hollywood USO (multiple potential locations)
7. Reliant Medical Center (potential)
20. Stella Middle Charter Academy and Bright Star Secondary Charter Academy

**Other Enabling Projects**

16. Improvements to portions of Center Way within the CTA
17. West Way Relocation
18. Land acquisition
19. Completion of the Manchester Square acquisition program
20. Stella Middle Charter Academy and Bright Star Secondary Charter Academy




NOTE: Improvements depicted are conceptual only and do not represent engineered design.
SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016; Ricondo & Associates, Inc., September 2016.
PREPARED BY: Ricondo & Associates, Inc., September 2016.

NORTH 0 1,000 ft.

**FIGURE 2-44**

## Enabling Projects

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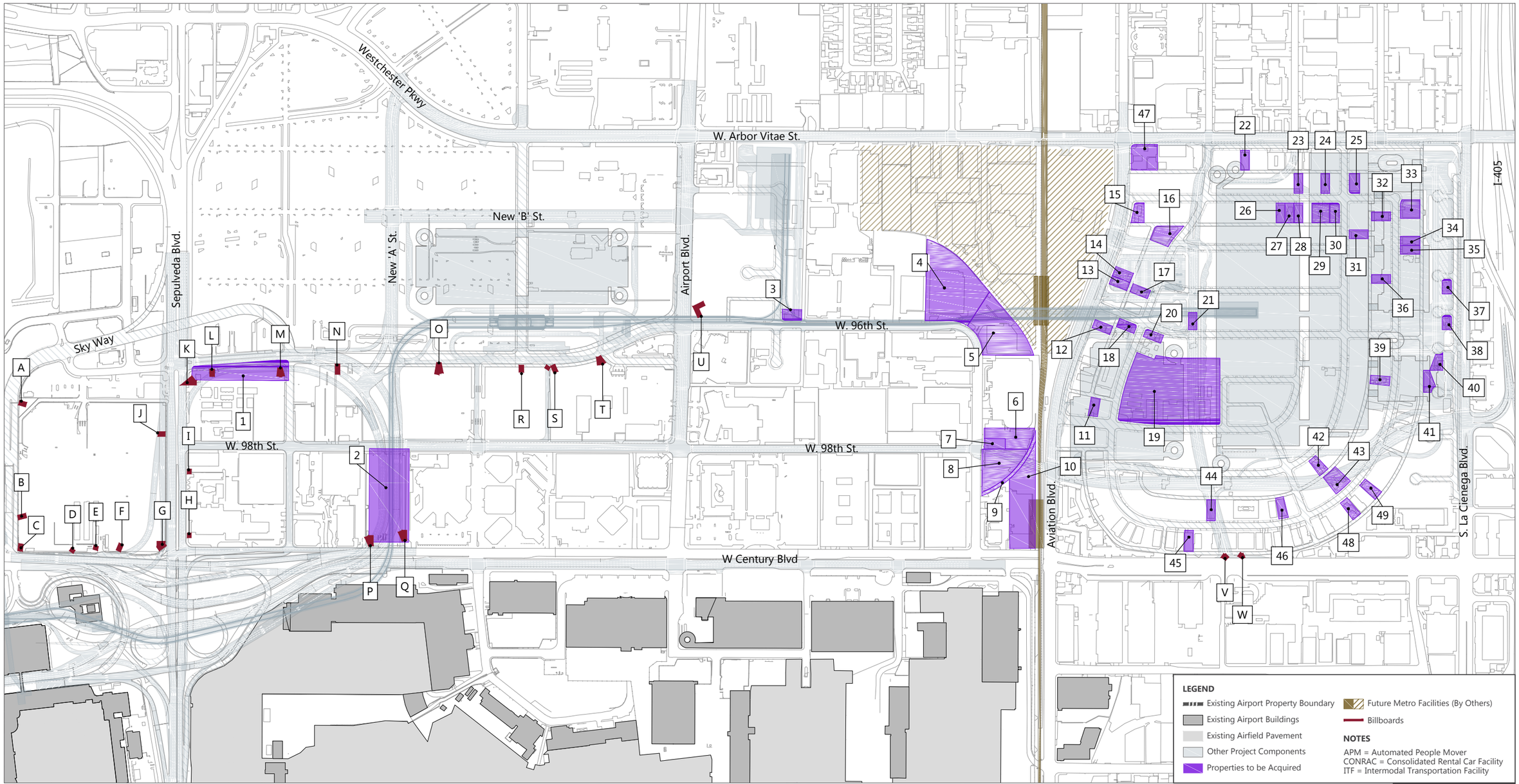


NOTE: Improvements depicted are conceptual only and do not represent engineered design.
SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016; Los Angeles World Airports, June 2016; Parsons Brinckerhoff, June 2016; Ricondo & Associates, December 2016.
PREPARED BY: Ricondo & Associates, Inc., February 2017.

NORTH 0 600 ft.

**FIGURE 2-47**

## Properties to be Acquired

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15. Table 2-15: Construction Phasing on page 2-179 of the Draft EIR has been revised to remove the Demolition of the Clifton Moore Administration Building. Demolition of this facility is now proposed to take place during the second phase of construction. Please see the following revised table.

16. Figure 2-52: Proposed LAX Plan Boundary Revisions on page 2-193 of the Draft EIR is hereby revised to change the existing designation of the Belford Area as "LAX Plan." Please see the following revised figure.

17. The following text has hereby been added after the second paragraph under the heading 2.8.1.3 Mobility Plan 2035 Amendment on page 2-195 of the Draft EIR:

    *As shown in Figure 2-53 (as revised in Chapter 3 of the Final EIR), updates to the City's Mobility Plan 2035 would include the reclassification of W. Century Boulevard between Aviation Boulevard and S. La Cienega Boulevard. This portion of W. Century Boulevard does not currently meet the standards of a Boulevard I of the Mobility Plan and would be included in amendments in order to correct the designation.*

18. Figure 2-53: Mobility Plan 2035 - Roadway Classification Revisions on page 2-197 of the Draft EIR is hereby revised to include a roadway classification revision for W. Century Boulevard between Aviation Boulevard and S. La Cienega Boulevard. Please see the following revised figure.

19. Figure 2-59: Proposed ITF West/Belford Area Tract Map on page 2-213 of the Draft EIR is hereby updated to the current tract map. Please see the following revised figure.

20. Figure 2-60: Proposed ITF East/CONRAC Tract Map on page 2-215 of the Draft EIR is hereby updated to the current tract map. Please see the following revised figure.

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**Table 2-15 (1 of 2): Construction Phasing**

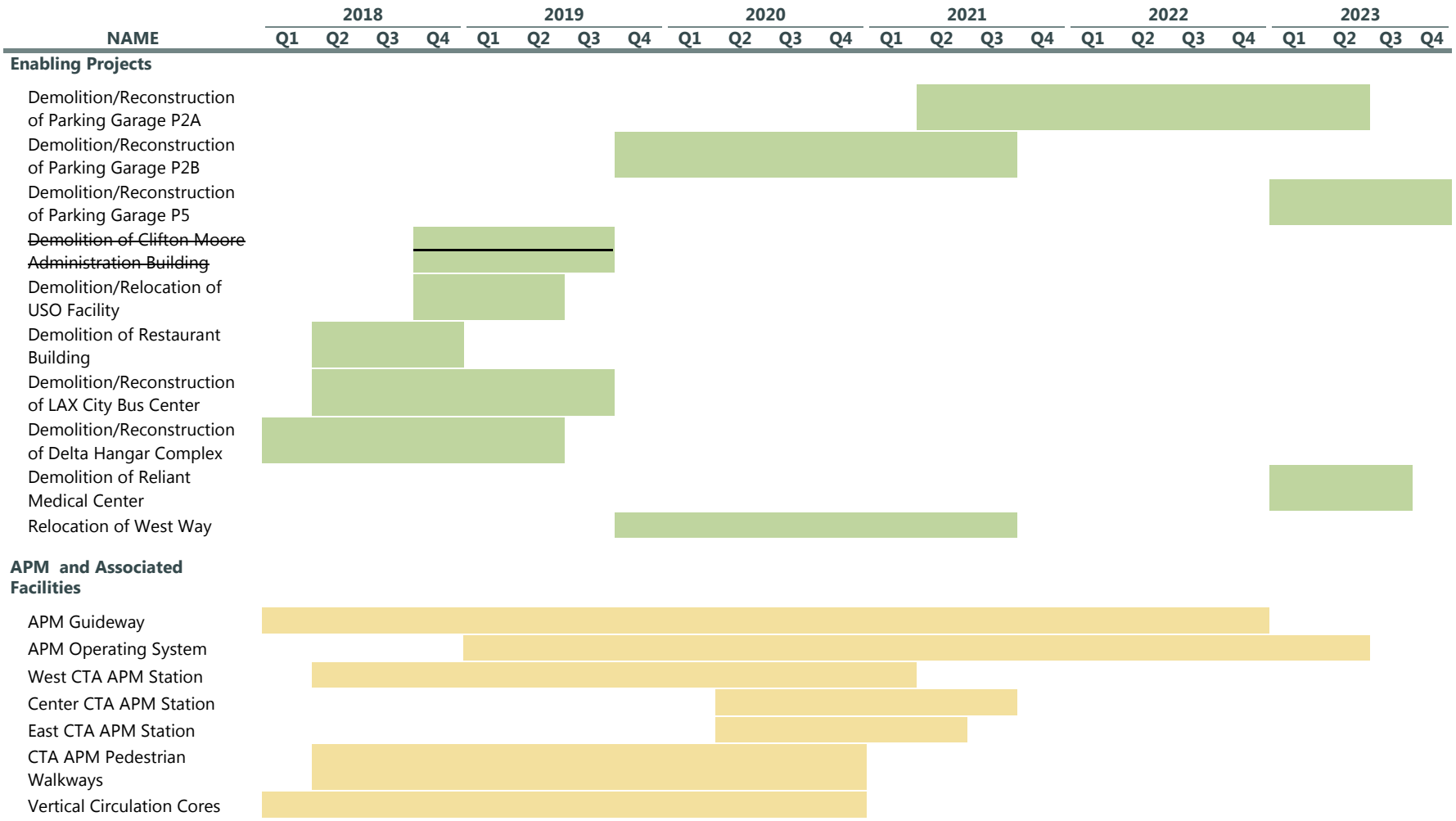
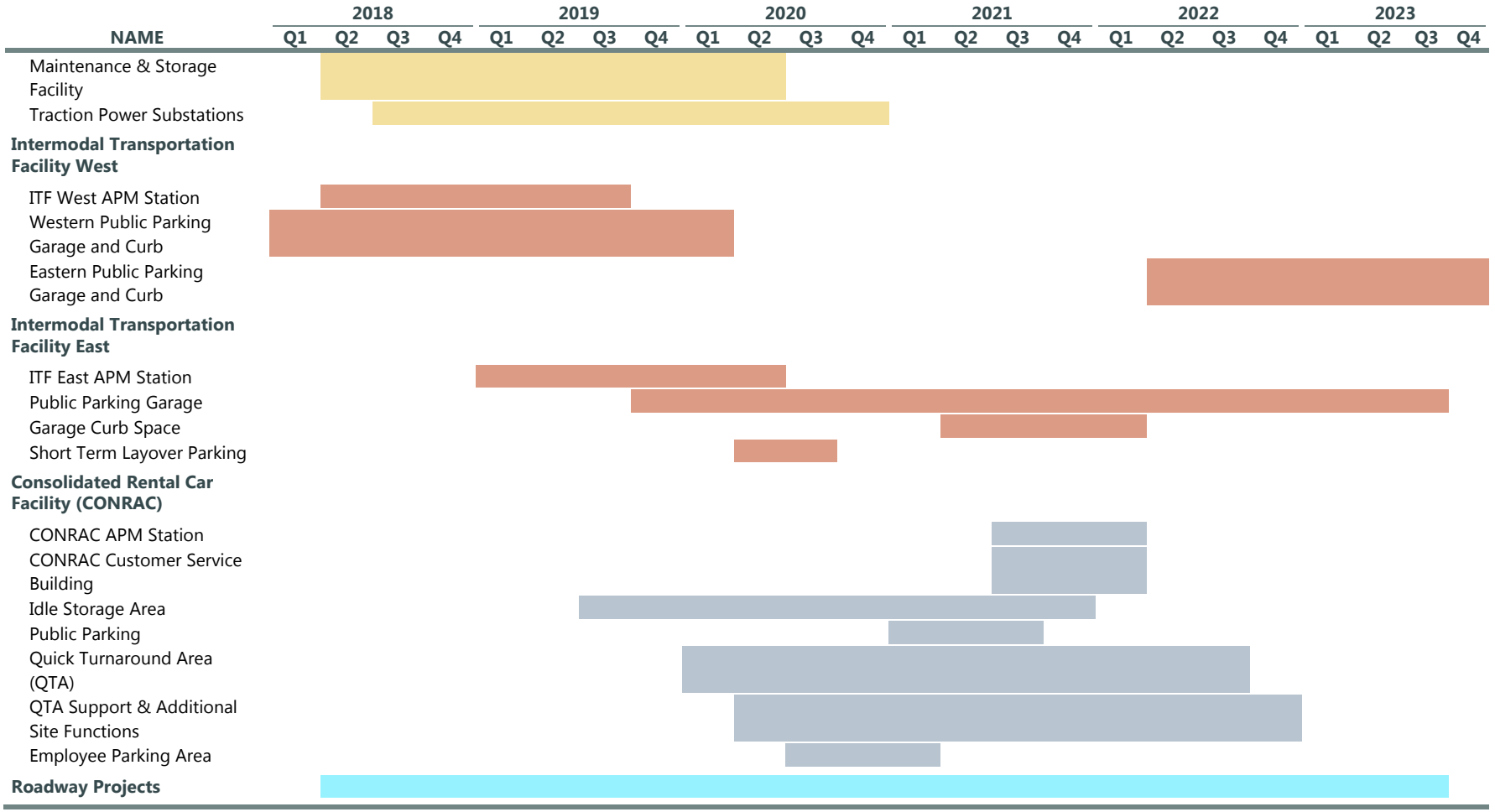
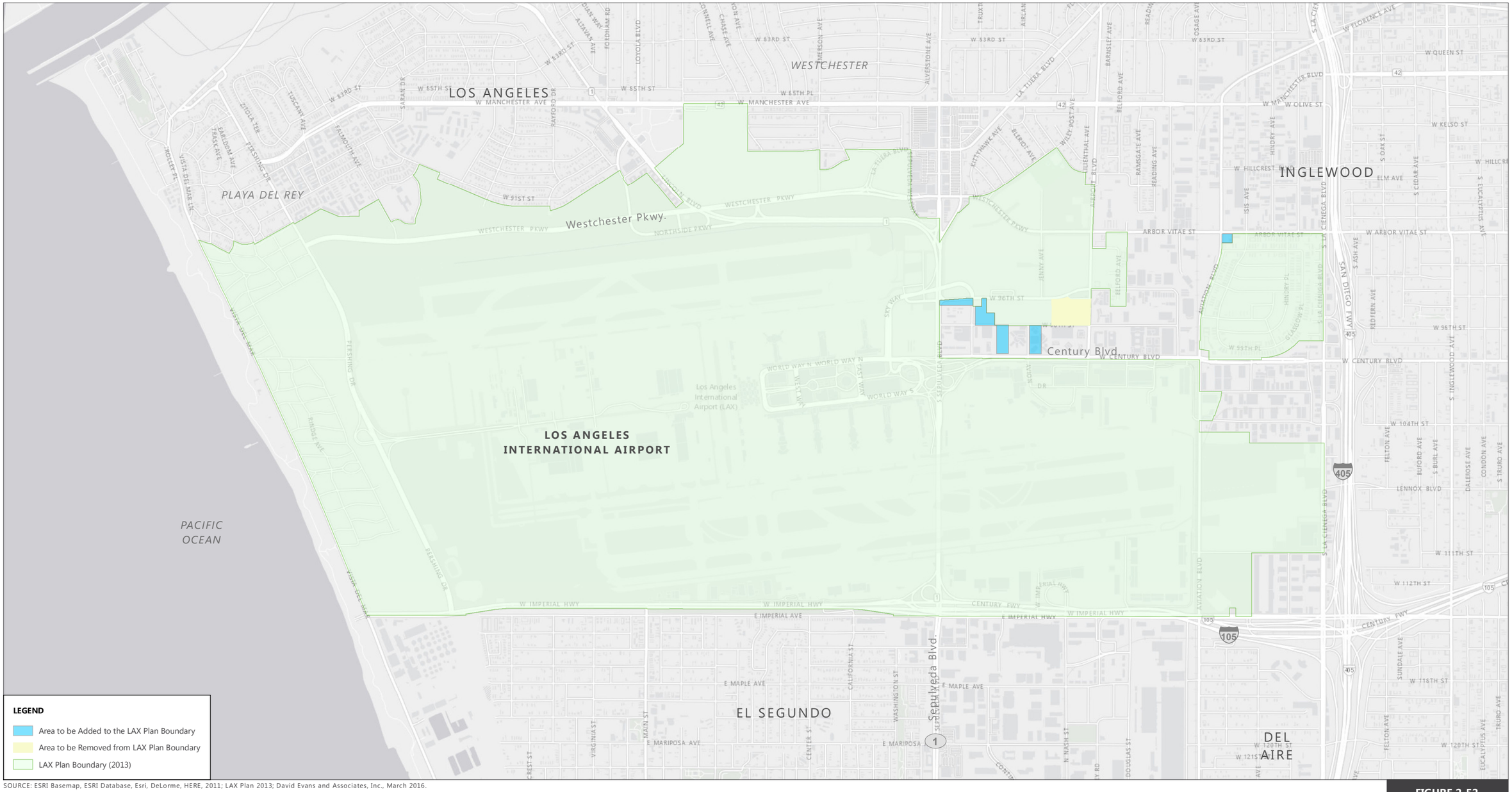


**Table 2-15 (2 of 2): Construction Phasing**




SOURCE: Connico, June 2016.
PREPARED BY: Ricondo & Associates, Inc., July 2016, *as revised February 2017*.




SOURCE: ESRI Basemap, ESRI Database, Esri, DeLorme, HERE, 2011; LAX Plan 2013; David Evans and Associates, Inc., March 2016.
PREPARED BY: Meridian Consultants, September 2016.

**FIGURE 2-52**

Proposed LAX Plan Boundary Revisions

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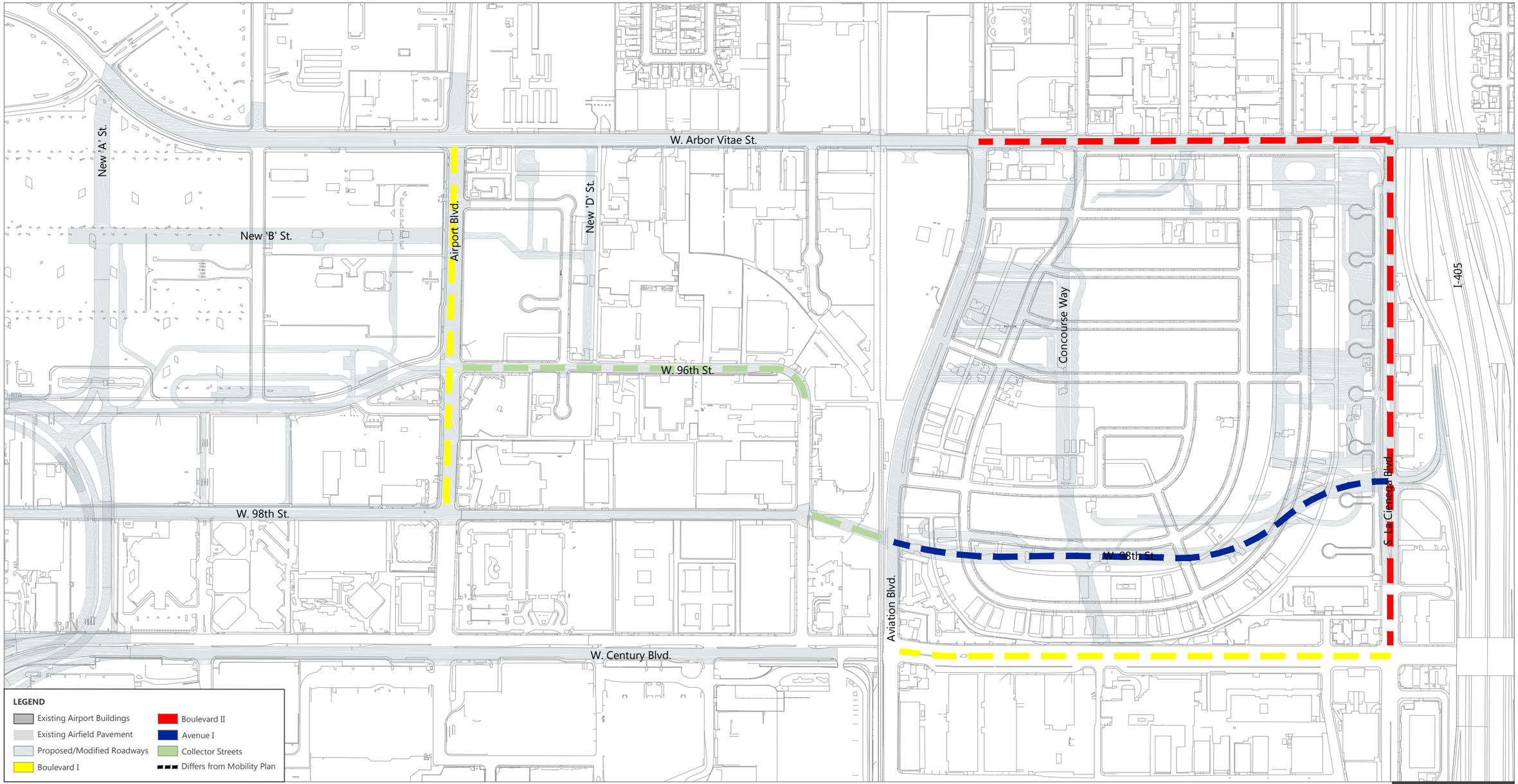


NOTE: Improvements depicted are conceptual only and do not represent engineered design.
SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016.
PREPARED BY: Ricondo & Associates, Inc., January 2017.

NORTH 0 500 ft.

**FIGURE 2-53**

Mobility Plan 2035
Roadway Classification Revisions

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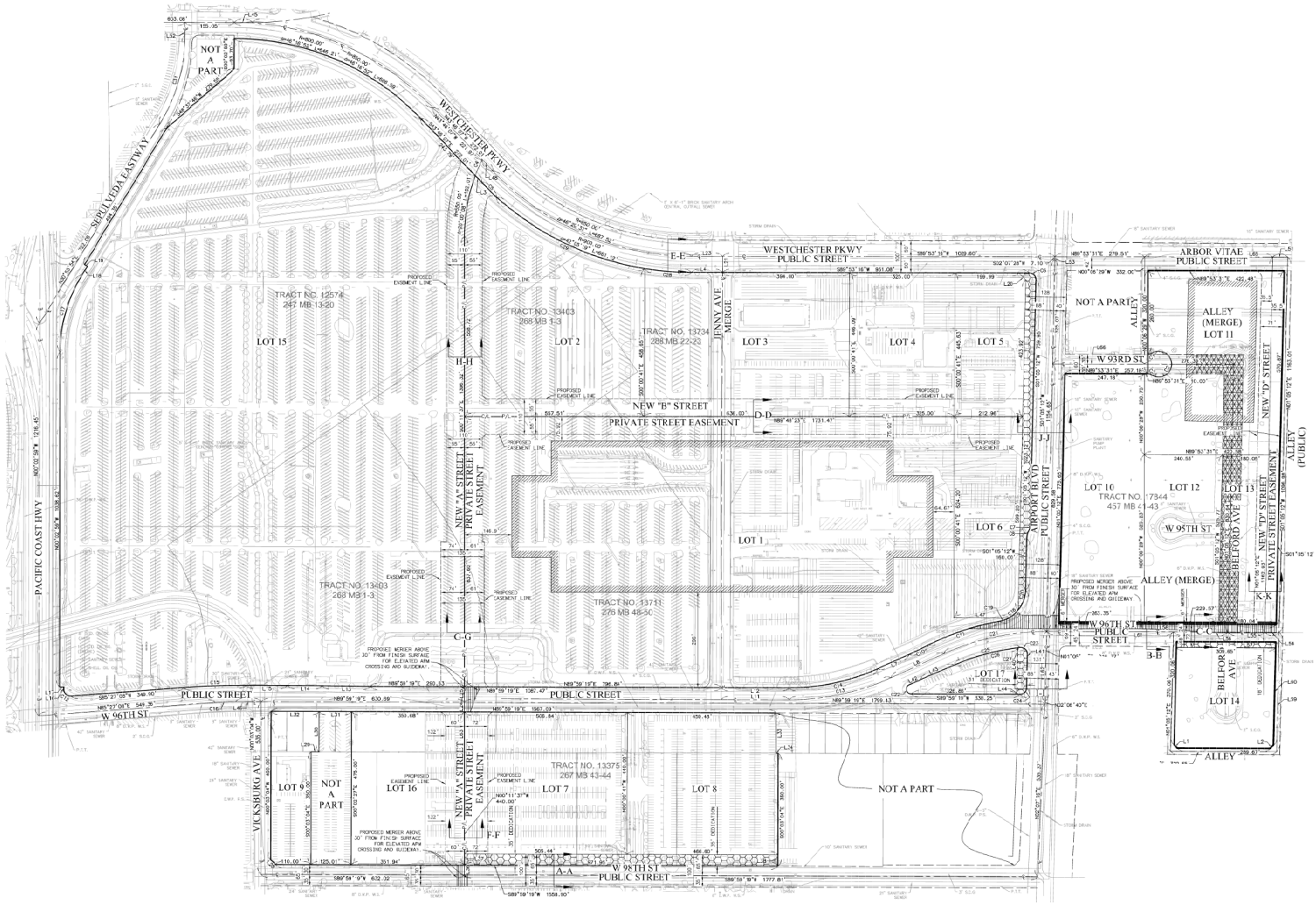


SOURCE: David Evans and Associates Inc., February 2017.
PREPARED BY: Ricondo & Associates, Inc., February 2017.

**FIGURE 2-59**

NORTH 0 Not To Scale

## Proposed ITF West/Belford Area Tract Map

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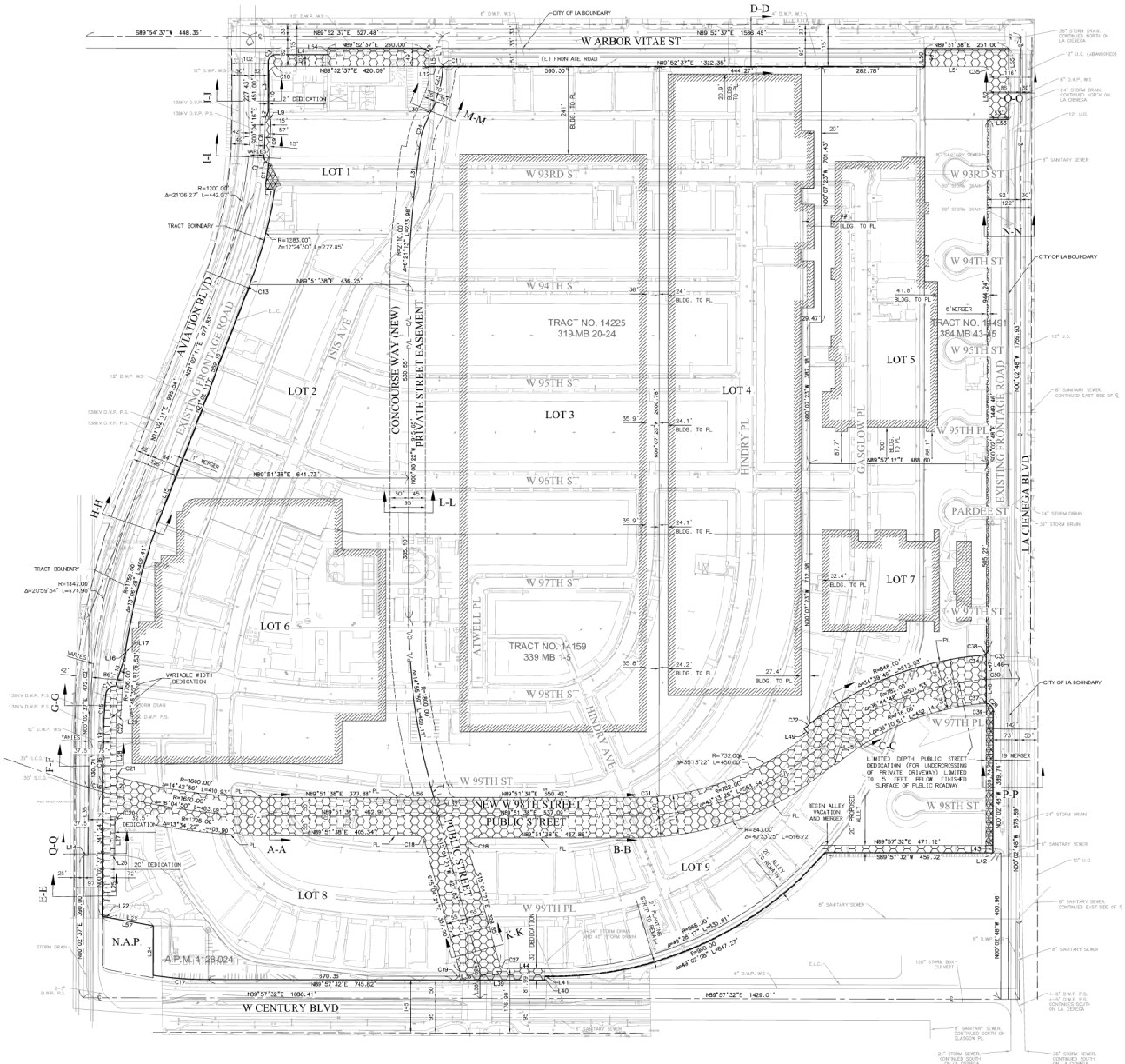


SOURCE: David Evans and Associates Inc., February 2017.
PREPARED BY: Ricondo & Associates, Inc., February 2017.

**FIGURE 2-60**

NORTH 0 Not To Scale

Proposed ITF East/CONRAC Tract Map

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## Chapter 3 Overview of Project Setting

1. Project 9 information in Table 3-1: Development Projects At/Adjacent to LAX (page 2 of 4) on page 3-10 of the Draft EIR is hereby revised as follows:

| | | | |
|---|---|---|---|
| 9*a* | Metro Crenshaw/LAX Transit Corridor *Project* ~~and Stations~~ | Jan 2015 – ~~2024~~ *2019* | The Los Angeles County Metropolitan Transportation Authority (Metro) is constructing the Crenshaw/LAX Transit Corridor Project, which includes an 8.5-mile light-rail transit line that will connect the existing Metro Green Line and the Metro Expo Line at Crenshaw and Exposition Boulevards. *As part of this project,* ~~Two~~ *a* station~~s are~~ *is* being constructed in proximity to LAX~~, one~~ near the intersection of Century Boulevard and Aviation Boulevard~~, and another proposed station at 96th Street and Aviation Boulevard, the Airport Metro Connector~~. |
| *9b* | *Airport Metro Connector (AMC) 96th Street Transit Station* | *2020 - 2023* | *Metro will be constructing a new multi-modal transportation center at 96th Street and Aviation Boulevard to connect LAX to the regional bus and transit system. Components of the AMC Station include three at-grade light rail transit (LRT) platforms, bus plaza, bicycle hub, pedestrian plaza, passenger vehicle pick-up and drop-off area and Metro transit center/terminal building ("Metro Hub") to connect passengers between the multiple transportation modes.* |

2. Project 20 information in Table 3-1: Development Projects At/Adjacent to LAX (page 3 of 4) on page 3-11 of the Draft EIR is hereby revised as follows:

| | | | |
|---|---|---|---|
| 20 | Secured Area Access Post (SAAP) Project | ~~March 2018 – March 2019~~ *October 2017 – April 2020* | Construction of a fully functional and all-encompassing access point onto the AOA on the west side of LAX. This will be the sole SAAP on World Way West to replace Post 5 which was taken out of service by the MSC project, and Post 21, which will be taken out of service by Phase 2 of the WAMA project. The proposed location of the new SAAP is parallel to, and south of, World Way West, near where the road will terminate at Coast Guard Road once the MSC is completed. |

3. Project information for the SoCal Metroplex in Table 3-1: Development Projects At/Adjacent to LAX (page 4 of 4) on page 3-12 of the Draft EIR is hereby revised as follows:

| | | | |
|---|---|---|---|
| N/A | Southern California Metroplex Aircraft Route and Airspace Management Structure Optimization (SoCal Project) | Proposed implementation in fall of 2016 | The FAA SoCal Project seeks to improve the efficiency of airspace in the Southern California Metroplex by optimizing aircraft arrival and departure procedures at Southern California airports. The FAA project may involve changes in aircraft flight paths and altitudes in certain areas, but would not result in any ground disturbance or increase the number of aircraft operations within the Southern California airspace. FAA published a ~~draft~~ *final* EA *and Finding of No Significant Impact* for the ~~proposed~~ SoCal Metroplex project in 201*6*~~5~~. |

4. Figure 3-1: Development Projects At/Adjacent to LAX on page 3-13 of the Draft EIR is hereby revised to reflect the change to Project 9 information in Table 3-1 shown above (to identify the Airport Metro Connector (AMC) 96th Street Transit Station as a separate project from the Metro Crenshaw/LAX Transit Project). Please see the following revised figure.

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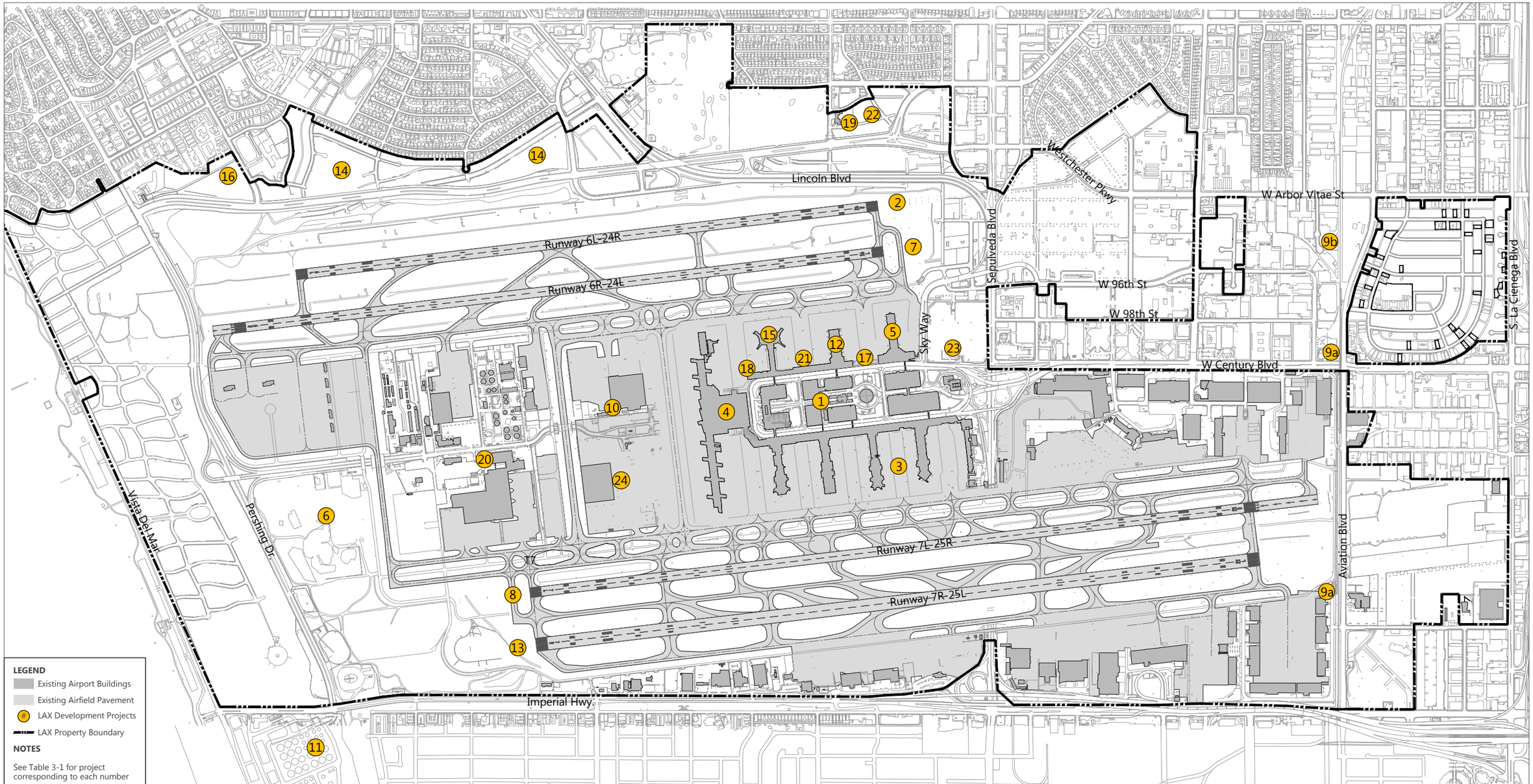


NOTE: Improvements depicted are conceptual only and do not represent engineered design.
SOURCE: Los Angeles World Airports; HNTB, July 2012; Historic Resources Group, LAX Landside Transportation Project Resources Assessment, January 2016; MapLAX, July 2016.
PREPARED BY: Ricondo & Associates, Inc., December 2016.

**FIGURE 3-1**

Development Projects At/Adjacent to LAX

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# Chapter 4 Environmental Impact Analysis

## Section 4.1 Aesthetics

1. Table 4.1-1: Shadow-Sensitive Uses within Proximity to the Project Site on page 4.1-6 of the Draft EIR is hereby revised as follows:

**Table 4.1-1: Shadow-Sensitive Uses within Proximity to the Project Site**

| NO. | SHADOW-SENSITVE USE | APPROXIMATEADDRESS |
|---|---|---|
| 1 | Concourse Hotel[1/] | 6225 W Century Blvd, Los Angeles |
| 2 | Courtyard LAX/Century Blvd. | 6161 W Century Blvd, Los Angeles |
| 3 | LAX Sheraton Gateway Hotel | 6101 W Century Blvd, Los Angeles |
| 4 | Crowne Plaza LAX | 5985 W Century Blvd, Los Angeles |
| 5 | Embassy Suites | 9801 Airport Blvd, Los Angeles |
| 6 | LAX Marriott | 5855 W Century Blvd, Los Angeles |
| 7 | Four Points Sheraton Hotel | 9750 Airport Blvd, Los Angeles |
| 8 | Renaissance LAX Hotel | 9620 Airport Blvd, Los Angeles |
| 9 | Super 8 LAX | 9250 Airport Blvd, Los Angeles |
| 10 | LAX Hilton | 5711 W Century Blvd, Los Angeles |
| 11 | Travelodge Hotel LAX | 5547 W Century Blvd, Los Angeles |
| 12 | The Westin LAX | 5400 W Century Blvd, Los Angeles |
| 13 | La Quinta Inn & Suites LAX | 5249 W Century Blvd, Los Angeles |
| 14 | Holiday Inn LAX | 9901 S La Cienega Blvd |
| 15 | Residential Development ~~1/~~ 2/ | Corner of Ramsgate Ave. and Morley St., Los Angeles |

NOTES:

1/ *At the time of preparation of the Draft EIR, the hotel at 6225 W. Century Boulevard was named the Concourse Hotel. In October 2016, the Concourse Hotel was renamed as the Hyatt Regency Los Angeles International Airport.*

~~1/~~ *2/* Location based on closest shadow-sensitive uses to the proposed Project components.

SOURCE: Meridian Consultants, August 2016.
PREPARED BY: Ricondo & Associates, Inc., August 2016*, as revised February 2017*.

2. The fifth sentence of the first paragraph under the 4.1.3.1.2 Century Boulevard Streetscape Plan heading on page 4.1-11 of the Draft EIR is hereby revised as follows:

> Other objectives of the plan include: (1) enhance and redefine the "Gateway to Los Angeles" by creating a sense of place; (2) enrich the pedestrian experience for the surrounding hotel guests and office employees; (3) create a high quality pedestrian environment where existing and future

businesses can thrive; and (4) improve the district's pedestrian connectivity to the regional Metro rail system, *including the Crenshaw/LAX and Green Lines,* local hotels and offices, and LAX.

## Section 4.2.1 Air Quality

1. The second sentence of the first paragraph on page 4.2-1 under the heading 4.2.1 AIR QUALITY of the Draft EIR is hereby revised as follows:

   The proposed Project would relieve traffic congestion within the Central Terminal Area (CTA) and the surrounding street network; improve access options and the travel experience for passengers; and provide a connection to the regional Los Angeles County Metropolitan Transportation ~~Agency~~ *Authority* (Metro) rail system.

2. Footnote 3 and the Sources in Table 4.2.1-2: South Coast Air Basin Attainment Status on page 4.2-22 of the Draft EIR are hereby revised as follows:

**Table 4.2.1-2: South Coast Air Basin Attainment Status**

| POLLUTANT | FEDERAL STANDARDS (NAAQS) [1/] | CALIFORNIA STANDARDS (CAAQS) [2/] |
|---|---|---|
| Ozone ($O_3$) | Nonattainment – Extreme | Nonattainment |
| Carbon Monoxide (CO) | Attainment – Maintenance | Attainment |
| Nitrogen Dioxide ($NO_2$) | Attainment – Maintenance | Attainment |
| Sulfur Dioxide ($SO_2$) | Attainment | Attainment |
| Respirable Particulate Matter ($PM_{10}$) | Attainment - Maintenance | Nonattainment |
| Fine Particulate Matter ($PM_{2.5}$) | Nonattainment [3/] | Nonattainment |
| Lead (Pb) | Nonattainment | Attainment |

NOTES:

1/ Status as of June 17, 2016.

2/ Effective December 2015.

3/ Classified as *attainment for 1997 NAAQS,* moderate nonattainment for 2012 NAAQS and serious nonattainment for 2006 NAAQS.

SOURCES: U.S. Environmental Protection Agency, *Green Book Nonattainment Areas*, Available: http://www3.epa.gov/airquality/greenbk/index.html, accessed May 24, 2016; California Air Resources Board, "Area Designations Maps/State and National," Available: http://www.arb.ca.gov/desig/adm/adm.htm, effective December 2015~~;~~ *U.S. Environmental Protection Agency. Federal Register vol. 81 No. 142 48350. Available: https://www.federalregister.gov/documents/2016/07/25/2016-17410/clean-data-determination-for-1997-pm25, effective August 24, 2016.*
Prepared by: CDM Smith, July 2016, *as revised February 2017*.

3. The last sentence at the bottom of page 4.2-24 and continuing to the top of page 4.2-25 of the Draft EIR is hereby revised as follows:

   The nearest representative monitoring station that monitors $PM_{2.5}$ is the South Coastal Los Angeles County 1 Station, which is located *at* 1305 E. Pacific Coast Highway (Long Beach).[44a]

[44a] *The use of the SCAQMD monitoring station calculating $PM_{2.5}$ concentrations nearest to the Project area is consistent with the CEQA guidelines governing SCAQMD, which directs that "[b]aseline information for the local air quality analysis should include information obtained from the nearest or most appropriate District air quality monitoring station ... " (South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993). Extrapolation of $PM_{2.5}$ concentrations to the immediate LAX vicinity is validated by the generally proportionate correlation to $PM_{10}$ concentrations measured at the SCAQMD monitoring station less than 0.5 mile from the northernmost runway at LAX.*

4. Table 4.2.1-7: Project Maximum Construction Emissions on page 4.2-34 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.2.1-7: Project Maximum Construction Emissions (lbs/day)**

| POLLUTANT | PEAK DAILY EMISSIONS | THRESHOLD | SIGNIFICANT? |
|---|---|---|---|
| Carbon monoxide, CO | *338* ~~340~~ | 550 | No |
| Volatile organic compounds, VOC | *88* ~~106~~ | 75 | **Yes** |
| Nitrogen oxides, $NO_X$ | *631* ~~654~~ | 100 | **Yes** |
| Sulfur dioxide, $SO_2$ | 2 | 150 | No |
| Respirable particulate matter, $PM_{10}$ | *43* ~~114~~ | 150 | No |
| Fine particulate matter, $PM_{2.5}$ | *29* ~~34~~ | 55 | No |

SOURCE: Appendix F of this EIR (*as revised February 2017)*
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

5. Table 4.2.1-8: Project Peak Construction Concentrations on page 4.2-35 of the Draft EIR has been revised. Please see the following revised table.

6. The first sentence under the Comparison of 2035 Future With Potential Future Related Development and 2015 Existing Conditions heading on page 4.2-49 of the Draft EIR is hereby revised as follows:

**Table 4.2.1-21** compares*, for informational purposes,* the 2035 Future With Project (including potential future related development) operational emissions to 2015 existing conditions.

7. Table 4.2.1-22: Cumulative Construction Projects Peak Quarter Emissions Estimates on pages 4.2-51 and 4.2-52 of the Draft EIR has been revised to correct addition errors. Please see the following revised table.

**Table 4.2.1-8: Project Peak Construction Concentrations ($\mu g/m^3$)**

| POLLUTANT | AVERAGING PERIOD [1/] | CONSTRUCTION ($\mu g/m^3$) | BACKGROUND ($\mu g/m^3$) | TOTAL ($\mu g/m^3$) | THRESHOLD ($\mu g/m^3$) [1/] | SIGNIFICANT? |
|---|---|---|---|---|---|---|
| CO | 1-hr CAAQS | 961 | 3,565 | 4,526 | 23,000 | No |
| | 8-hr CAAQS | 120 | 2,778 | 2,898 | 10,000 | No |
| $NO_2$ | 1-hr CAAQS | *124* ~~126~~ | 164 | *288* ~~290~~ | 339 | No |
| | 1-hr NAAQS | *201* ~~203~~ | --[2/] | *201* ~~203~~ | 188 | **Yes** |
| | Annual CAAQS | *19* ~~15~~ | 23 | *42* ~~38~~ | 57 | No |
| $SO_2$ | 1-hr CAAQS | 3 | 39 | 42 | 655 | No |
| | 1-hr NAAQS | 3 | 16 | 19 | 196 | No |
| | 3-hr NAAQS | 2 | 39 | 41 | 1,300 | No |
| | 24-hr CAAQS | 1 | 8 | 9 | 105 | No |
| | Annual NAAQS | 0 | 3 | 3 | 80 | No |
| $PM_{10}$ | 24-hr | *10.4* ~~16~~ | --[3/] | *10.4* ~~16.0~~ | 10.4 | **Yes** |
| | Annual | *1.6* ~~3~~ | --[3/] | *1.6* ~~3.0~~ | 1.0 | **Yes** |
| $PM_{2.5}$ | 24-hr | *3.6* ~~9~~ | --[3/] | *3.6* ~~9.0~~ | 10.4 | No |

NOTES:

CAAQS = California Ambient Air Quality Standard.

NAAQS = National Ambient Air Quality Standard.

1/ NAAQS and CAAQS often have the same averaging period, but usually have different standard values and may have different methods of determining compliance with each standard.

2/ The background 1-hour $NO_2$ values for the NAAQS analysis included 98th percentile concentrations for each hour-of-day by season (Winter, Spring, Summer, and Fall), 96 hourly values total, and these background $NO_2$ concentrations were included in the AERMOD runs so that the modeled concentration already included addition of background $NO_2$.

3/ $PM_{10}$ and $PM_{2.5}$ thresholds are project only values, therefore, are not added to background concentrations.

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016, *as revised February 2017*.

**Table 4.2.1-22 (1 of 2): Cumulative Construction Projects Peak Quarter Emissions Estimates (tons/quarter)**

| | CUMULATIVE DEVELOPMENT PROJECTS DURING CONSTRUCTION | CO | VOC | $NO_X$ | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|---|
| N/A | Landside Access Modernization Program [1/] | *9.7* ~~7.5~~ | *1.7* ~~2.1~~ | *17.7* ~~18.4~~ | <1 | *1.3* ~~1.8~~ | 0.9 |
| 1. | South Terminal Improvements | *0.6* ~~0.59~~ | *0.3* ~~0.25~~ | *0.8* ~~0.76~~ | *<1* ~~0.01~~ | *0.1* ~~0.10~~ | *0.1* ~~0.05~~ |
| 2. | LAX Bradley West Project | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] |
| 3. | Terminal 1 Improvements | 2.2 | 0.2 | 1.5 | <1 | 0.2 | 0.1 |
| 4. | West Aircraft Maintenance Area Project | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] |
| 5. | Runway 6R-24L Runway Safety Area Improvements-North Airfield | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] |
| 6. | Runway 7L-25R Runway Safety Area Improvements-South Airfield | 65.5 | 6.7 | 15.3 | 2.9 | 1.9 | 0.6 |
| 7. | Metro Crenshaw/LAX Transit Corridor and Station | 4.9 | 1.0 | 8.8 | <1 | 1.0 | 0.6 |
| 8. | LAX Midfield Satellite Concourse (MSC) North Project | 35.0 | 3.6 | 12.5 | <1 | 9.5 | 2.2 |
| 9. | Hyperion Treatment Plant Connector | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] |
| 10. | Miscellaneous Projects and Improvements | 23.9 | 6.4 | 32.3 | <1 | 4.2 | 1.7 |
| 11. | Terminal 2 Improvements | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] |
| 12. | Runway 7R-25L Rehabilitation | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] |
| 13. | MSC North Extension [3/] | 3.5 | 0.4 | 1.3 | <1 | 1 | 0.2 |
| 14. | Northside Development | 8.1 | 4.1 | 1.6 | <1 | 1.0 | 0.4 |
| 15. | Terminal 3 Improvements | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] |
| 16. | City Los Angeles Bureau of Sanitation Stormwater Infiltration and Treatment Facility | 11.3 | 1.0 | 6.0 | 0.0 | 1.5 | 0.7 |
| 17. | Terminal 1.5 | 1.0 | 1.5 | 1.2 | <1 | 0.3 | 0.2 |
| 18. | Terminal 3 (T-3) Connector | 0.5 | 0.2 | 0.6 | <1 | 0.1 | 0.0 |
| 19. | Canine Facility/Airport Police Department Range | --[6/] | --[6/] | --[6/] | --[6/] | -[6/] | --[6/] |
| 20. | Secured Area Access Post (SAAP) Project | 1.3 | 0.2 | 1.8 | <1 | 0.2 | 0.2 |
| 21. | Terminals 2 and 3 Modernization Project | 9.9 | 2.8 | 8.5 | <1 | 4.4 | 1.9 |
| 22. | Airport Police Station Relocation | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] | --[2/] |
| 23. | Concourse 0 [5/] | 2.3 | 0.5 | 5.6 | <1 | 2.6 | 0.4 |
| 24. | MSC South Project | 3.5 | 0.4 | 1.3 | <1 | 1 | 0.2 |
| 25. | North Airfield Safety Improvements [4/] | 6.8 | 1.4 | 16.3 | <1 | 10.9 | 1.5 |
| | Total from Other Construction Projects Emissions | *180.3* ~~86.8~~ | *30.7* ~~19.1~~ | *115.4* ~~81.4~~ | <1 | *39.9* ~~30.7~~ | *11.0* ~~7.4~~ |
| | **Total Cumulative Construction Project Emissions** | ***190.0*** **~~104.2~~** | ***32.4*** **~~24.0~~** | ***133.1*** **~~108.3~~** | **<1** | ***41.2*** **~~36.9~~** | ***11.9*** **~~10.2~~** |
| | SCAQMD Construction Emission Significance Thresholds | 24.75 | 2.5 | 2.5 | 6.75 | 6.75 | 2.5 |
| | Emissions Exceed SCAQMD Project-Level Threshold? | Yes | Yes | Yes | No | Yes | Yes |

NOTES:

1/ Project construction is estimated to occur from 2018 to 2030.

2/ Based on the anticipated construction schedule, this project is not anticipated to result in overlapping construction emissions with the Proposed Project during the estimated combined peak day.

3/ MSC North Extension peak day emissions estimated to be 10 percent of MSC North Project emissions.

4/ North Airfield Safety Improvements emissions were based on emissions estimated for LAX Specific Plan Amendment Study – Alternative 2 for construction elements: Center Taxiway for 24L, Runway 24L & South Parallel Taxiways, North CTA Aprons & Taxiways, and associated Support.

5/ Concourse 0 emissions were based on emissions estimated for LAX Specific Plan Amendment Study – Staff Recommended Alternative for construction elements: North CTA Concourses, North CTA Aprons & Taxiways, and associated Support.

6/ Canine Facility/Airport Police Department Range is accounted for in Northside Development.

SOURCES: City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse*, (SCH No. 2013021020), June 2014; City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Northside Plan Update*, (SCH 2012041003), December 2014; City of Los Angeles, Los Angeles World Airports, *Los Angeles International Airport (LAX) Terminal 1.5 Project Initial Study-Proposed Mitigated Negative Declaration*, July 2016; City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Specific Plan Amendment Study*, (SCH 1997061047), January 2013.
PREPARED BY: ~~Ricondo & Associates, Inc., July 2016.~~ *CDM Smith, September 2016, as revised February 2017*.

8. The second sentence of the first paragraph on page 4.2-53 of the Draft EIR is hereby revised as follows:

   However, the operational emissions associated with the potential future related development combined with proposed Project emissions would exceed the operational thresholds for ~~CO,~~ VOC~~,~~ and NOx~~, $PM_{10}$, and $PM_{2.5}$~~.

9. Mitigation Measure Number 1b of LAX-AQ-1 included in Table 4.2.1-23: Construction-Related Air Quality Control Measures on page 4.2-54 of the Draft EIR is hereby revised as follows:

   ~~Prior to final occupancy~~*During construction*, the contractor shall demonstrate that all ground surfaces are covered or treated sufficiently to minimize fugitive dust emissions.

10. Mitigation Measure Number 1e of LAX-AQ-1 included in Table 4.2.1-23: Construction-Related Air Quality Control Measures on page 4.2-54 of the Draft EIR is hereby revised as follows:

    All diesel-fueled equipment used for construction will be outfitted with the best available emission control devices, where technologically feasible, primarily to reduce emissions of diesel particulate matter (PM), including fine PM (PM2.5), and secondarily, to reduce emissions of NOx. This requirement shall apply to diesel-fueled off-road equipment (such as construction machinery), diesel-fueled on-road vehicles (such as trucks), and stationary diesel-fueled engines (such as electric generators). (It is unlikely that this measure will apply to equipment with Tier 4 engines*, as these engines typically already incorporate the best available emission control devices*.) The emission control devices utilized in construction equipment shall be verified or certified by California Air Resources Board or US Environmental Protection Agency for use in on-road or off-road vehicles or engines. For multi-year construction projects, a reassessment *of equipment availability, equipment fleet mixtures, and best available emissions control devices* shall be conducted annually *for equipment newly brought to the project site each year*~~to determine what constitutes a best available emissions control device~~.

11. Mitigation Measure Number 1g of LAX-AQ-1 included in Table 4.2.1-23: Construction-Related Air Quality Control Measures on page 4.2-54 of the Draft EIR is hereby revised as follows:

    To the extent feasible, have construction employees ~~work/~~commute during off-peak hours.

12. Measure Number 1q added to the measure listed on page 2 of Table 4.2.1-23: Construction-Related Air Quality Control Measures on page 4.2-55 of the Draft EIR is hereby revised as follows:

| MEASURE NUMBER | MEASURE | TYPE OF MEASURE |
|---|---|---|
| *1q* | The on-road haul truck and off-road construction equipment requirements set forth in Standard Air Quality Control Measures 1o and 1p above shall apply unless any of the following circumstances exist and the Contractor provides a written finding consistent with project contract requirements that:<br>o The Contractor does not have the required types of on-road haul trucks or off-road construction equipment within its current available inventory and intends to meet the requirements of the Measures 1o and 1p as to a particular vehicle or piece of equipment by leasing or short-term rental, and the Contractor has attempted in good faith and due diligence to lease the vehicle or equipment that would comply with these measures, but that vehicle or equipment is not available for lease or short-term rental within 120 miles of the project site, and the Contractor has submitted documentation to LAWA showing that the requirements of this exception provision (Measure 1q) apply.<br>o The Contractor has been awarded funding by SCAQMD or another agency that would provide some or all of the cost to retrofit, repower, or purchase a piece of equipment or vehicle, but the funding has not yet been provided due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and due diligence to lease or short-term rent the equipment or vehicle that would comply with Measures 1o and 1p, but that equipment or vehicle is not available for lease or short-term rental within 120 miles of the project site, and the Contractor has submitted documentation to LAWA showing that the requirements of this exception provision (Measure 1q) apply.<br>o Contractor has ordered a piece of equipment or vehicle to be used on the construction project in compliance with Measures 1o and 1p at least 60 days before that equipment or vehicle is needed at the project site, but that equipment or vehicle has not yet arrived due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and due diligence to lease or short-term rent a piece of equipment or vehicle to meet the requirements of Measures 1o and 1p, but that equipment or vehicle is not available for lease or short-term rental within 120 miles of the project, and the Contractor has submitted documentation to LAWA showing that the requirements of this exception provision (Measure 1q) apply.<br>o Construction-related diesel equipment or vehicle will be used on the project site for fewer than 20 calendar days per calendar year. The Contractor shall not consecutively use different equipment or vehicles that perform the same or a substantially similar function in an attempt to use this exception (Measure 1q) to circumvent the intent of Measures 1o and 1p.<br>o Documentation of good faith efforts and due diligence regarding the above exceptions shall include written record(s) of inquiries (i.e., phone log[s]) to at least three (3) leasing/rental companies that provide construction-related on-road trucks of the type specified in Measure 1o above (i.e., medium-duty and larger diesel-powered trucks with a gross vehicle weight rating of at least 14,001 pounds) or diesel-powered off-road construction equipment such as the types to be used by the Contractor, documenting the availability/unavailability of the required types of trucks/equipment. LAWA will, from time-to-time, conduct independent research and verification of the availability of such vehicles and equipment for lease/rent within a 120 mile radius of LAX, which may be used in reviewing the acceptability of the Contractor's good faith efforts and due diligence.<br>In any of the situations described above, the Contractor/ Subcontractor shall provide the next cleanest piece of equipment or vehicle as provided by the step down schedules in Table A for Off-Road Equipment and Table B for On-Road Equipment.<br>Nothing in the above shall require an emissions control device (i.e., VDECS) that does not meet OSHA standards. | |

13. The end of Table 4.2.1-23: Construction-Related Air Quality Control Measures on page 4.2-56 of the Draft EIR is hereby revised as follows:

~~NOTES:~~

~~NQ = Not Quantified~~

14. Mitigation Measure Number 2a of LAX-AQ-2 included in Table 4.2.1-24: Transportation-Related Air Quality Control Measures on page 4.2-57 of the Draft EIR is hereby revised as follows:

Provide ~~free parking and~~ preferential parking locations for ultra-low emission vehicles/super low emission vehicles/zero emission vehicles (ULEV/SULEV/ZEV) in all (including employee) LAX lots; provide free charging stations for ZEV; include public outreach to reduce air emissions from automobiles accessing airport parking.

15. Mitigation Measure MM-AQ (LAMP)-1 on page 4.2-58 of the Draft EIR is hereby revised as follows:

- **MM-AQ (LAMP)-1 – Preferential Use of Renewable Diesel Fuel.** LAWA will require the use of renewable diesel fuel in proposed Project construction off-road equipment and on-site, on-road trucks, *for at least 90 percent of diesel fuel demand* ~~to the extent feasible~~. Renewable diesel fuel is available locally *for fleetwide use* and has been shown to reduce criteria pollutant and greenhouse gas emissions from diesel engines.[55,55a]

[55] Neste Oil Corporation NEXBTL Renewable Diesel, 2014, Available: https://www.neste.com/sites/default/files/attachments/nexbtl_03032014.pdf, accessed August 23, 2016.

[55a] *Propel Fuels, 2016, Available: https://propelfuels.com/fleet_and_commercial, accessed August 23, 2016.*

16. The first full sentence on page 4.2-59 of the Draft EIR is hereby revised as follows:

~~Similarly, the mitigated off-road construction equipment fleet was assumed to be 30 percent USEPA Tier 3 compliant, 35 percent Tier 4 Interim compliant, and 35 percent Tier 4 Final compliant. Fifty percent of the USEPA Tier 3 compliant equipment was assumed to be fitted with Level 3 VDECS diesel particulate filters. Compliance with the USEPA Tier 3 and Tier 4 off-road emissions standards would also result in substantial reduction in emissions of VOC, NOx, $PM_{10}$ and $PM_{2.5}$ compared to fleet-wide average emissions for heavy-duty construction equipment. In addition, t~~*T*he use of renewable diesel fuel in the construction fleet also provides reductions in emissions of NOx, CO, $PM_{10}$, and $PM_{2.5}$. The estimated effect of these control measures are shown in the tables below.

17. Table 4.2.1-26: Project - Maximum Construction Emissions with Mitigation on page 4.2-59 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.2.1-26: Project - Maximum Construction Emissions (lbs/day), with Mitigation**

| POLLUTANT | PEAK DAILY EMISSIONS | THRESHOLD | SIGNIFICANT? |
|---|---|---|---|
| Carbon monoxide, CO | *292* ~~293~~ | 550 | No |
| Volatile organic compounds, VOC | *81* ~~83~~ | 75 | **Yes** |
| Nitrogen oxides, $NO_X$ | *341* ~~381~~ | 100 | **Yes** |
| Sulfur dioxide, $SO_2$ | 2 | 150 | No |
| Respirable particulate matter, $PM_{10}$ | *26* ~~84~~ | 150 | No |
| Fine particulate matter, $PM_{2.5}$ | *11* ~~16~~ | 55 | No |

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

18. Table 4.2.1-27: Project - Construction Peak Concentrations with Mitigation on page 4.2-60 of the Draft EIR has been revised to reflect updated modeling resulting from incorporation of recommended SCAQMD mitigation refinements and minor corrections to modeling. Please see the following revised table.

**Table 4.2.1-27: Project - Construction Peak Concentrations (µg/m$^3$), with Mitigation**

| POLLUTANT | AVERAGING PERIOD | CONSTRUCTION (µg/m$^3$) | BACKGROUND (µg/m$^3$) | TOTAL (µg/m$^3$) | THRESHOLD (µg/m$^3$) | SIGNIFICANT? |
|---|---|---|---|---|---|---|
| $NO_2$ | 1-hr NAAQS | *182* ~~185~~ | --[1/] | *182* ~~185~~ | 188 | No |
| $PM_{10}$ | 24-hr | *5.9* ~~13~~ | --[2/] | *5.9* ~~13.0~~ | 10.4 | *No* ~~**Yes**~~ |
| | Annual | *1.1* ~~3~~ | --[2/] | *1.1* ~~2.8~~ | 1.0 | **Yes** |

NOTES:

1/ The background 1-hour $NO_2$ values for the NAAQS analysis included 98$^{th}$ percentile concentrations for each hour-of-day by season (Winter, Spring, Summer, and Fall), 96 hourly values total, and these background $NO_2$ concentrations were included in the AERMOD runs so that the modeled concentration already included addition of background $NO_2$.

2/ PM10 thresholds are project only values, therefore, are not added to background concentrations.

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

19. The first paragraph on page 4.2-60 of the Draft EIR is hereby revised as follows:

> As shown in Table 4.2.1-27, by incorporating measures included in Standard Control Measure (Mitigation Measure) LAX-AQ-1 and Mitigation Measure MM-AQ (LAMP)-1, significant $NO_2$ impacts, specifically impacts associated with the 1 hour NAAQS standards, *and $PM_{10}$ impacts, specifically associated with 24-hour NAAQS standards,* would be mitigated to a level that is less than significant. Construction-related annual concentrations of $PM_{10}$ would remain significant.

20. The fifth sentence of the first paragraph under the Mitigated Local Operational Pollutant Concentration Impacts heading on page 4.2-63 of the Draft EIR is hereby revised as follows:

Therefore, the mitigated local operational impacts would be the same as those for unmitigated impacts shown in Table~~s~~ 4.2.1-14, *Table 4.2.1-* ~~and~~ 15*, and Table 4.2.1-16*.

21. The first sentence under the Comparison of 2035 Future With Project (Including Potential Future Related Development) Mitigated Emissions and 2015 Existing Conditions heading on page 4.2-65 of the Draft EIR is hereby revised as follows:

**Table 4.2.1-34** compares*, for informational purposes,* the 2035 Future With Project (including potential future related development) operational emissions to 2015 existing conditions.

22. The first sentence of the first paragraph under the Regional Operational Emissions Significance heading on page 4.2-67 of the Draft EIR is hereby revised as follows:

With implementation of Standard Control Measures (Mitigation Measures) LAX-AQ-2 and LAX-AQ-3 and Mitigation Measure MM-GHG (LAMP)-1, operations-related significant impacts associated with regional emissions would be *further* reduced~~, but not to a level that~~ *and* would *remain*~~be~~ less than significant~~, specifically for VOC, and NOX, and CO emissions under the hypothetical assumption that the proposed Project had been completed in 2015 and the activities had reached future (2024 and 2035) levels in 2015~~.

23. The first sentence of the first paragraph under the Regional Operational Emissions Significance heading on page 4.2-68 of the Draft EIR is hereby revised as follows:

With implementation of Standard Control Measures (Mitigation Measures) LAX-AQ-2 and LAX-AQ-3 and Mitigation Measure MM-GHG (LAMP)-1, operations-related significant impacts to regional emissions would be reduced, but not to a level that would be less than significant, specifically for VOC~~,~~ *and* $NO_X$~~, and $PM_{10}$~~. No other feasible mitigation measures have been identified at this time that would reduce impacts to air quality further. Therefore, impacts to regional air quality would be significant and unavoidable.

## Section 4.2.2 Human Health Risk Assessment

1. The first sentence of the first paragraph on page 4.2-69 of the Draft EIR is hereby revised as follows:

As discussed in Chapter 2, *Description of the Proposed Project*, the proposed Project would relieve traffic congestion within the Central Terminal Area (CTA) and on the surrounding street network, improve access options and the travel experience for passengers, and provide connection to the Metro rail system*, including the Crenshaw/LAX and Green Lines*.

2. The third paragraph of Section 4.2.2.1 Introduction on page 4.2-69 of the Draft EIR is hereby revised as follows:

> For purposes of the HHRA analysis, construction of the proposed Project is assumed to take approximately *11*~~14~~ years, starting in late 2017 and with most elements completed by 20*27*~~30~~; some portions of the Project including the potential future related development may extend through to 2035. For purposes of this analysis, to be conservative, it was assumed that all construction would be completed by 20*27*~~30~~. Based on current construction phasing plans, the bulk of the construction activities that would increase TAC emissions (i.e., demolition and regrading) would occur within the first 5 years of construction, although construction activities are expected to span the entire *11*~~14~~-year period. Operation of the first completed components of the proposed Project (e.g., APM, the CONRAC, the ITF West, the ITF East, and most of the roadway improvements) is anticipated to start in 2024. Although the remaining components of the proposed Project (mainly roadway improvements) are anticipated to be completed by 20*27*~~30~~ (i.e., end of construction), the analysis of the future condition is for 2035.

3. The second sentence of the fourth full paragraph on page 4.2-70 of the Draft EIR is hereby revised as follows:

> ~~California EPA~~ *The SCAQMD* has published a series of studies on air quality that provide data on regional air quality in the South Coast Air Basin, and these data were used to evaluate cumulative impacts of emissions on health risks.

4. The second paragraph under the heading Section 4.2.2.1.4 Overview of Risk Assessment on page 4.2-73 of the Draft EIR is hereby revised as follows:

> *Releases from* ~~E~~emissions sources during construction were analyzed for each construction year from 2017 through 20*27*~~30~~. Operational emissions were analyzed for 2024 and 2035 with and without the proposed Project, as well as for 2015 baseline conditions in order to determine the incremental impact. Year 2024 was chosen as the first year in which proposed Project changes to airport operations would be realized. Year 2035 is the last year for which operations projections are available.

5. The first paragraph under the heading Toxicity Assessment on page 4.2-77 of the Draft EIR is hereby revised as follows:

> Risks from exposure to TAC were calculated by combining estimates of exposure via inhalation with appropriate toxicity criteria, as described in more detail below. A toxicity assessment for TAC of concern was conducted for the LAX Master Plan Final EIR, as described in Technical Report 14a of that EIR. Since completion of these reports, some changes have been made by both the CalEPA OEHHA and USEPA to toxicity criteria for a few TAC identified in Table 4.2.2-1. To maintain consistency with regulatory guidance, toxicity information from previous HHRA efforts

were updated from the most current state and federal regulatory databases for the analyses included in this report. *Only toxicity criteria from EPA and CalEPA were used.* Such criteria remained unchanged for DPM, Cr VI, benzene, formaldehyde, nickel, all TAC associated with the greatest estimated health impacts in previous programmatic and project-specific risk assessments.

6. The second through fourth paragraphs on page 4.2-78 of the Draft EIR are hereby revised as follows:

For construction, location and magnitude of emissions were assumed to change as different portions of the Project are begun and completed throughout the construction period. To incorporate this variability into the model, construction emissions were modeled separately for each year of construction from 2017 to ~~2030~~*2027*. Risks for receptors were calculated by grid point for each year of construction and then added together to determine total risk *for locations in the study area* ~~by grid point~~ for the construction period. For the portion of the receptors' exposure period that was longer than the construction period, construction emissions were assumed to be zero, and incremental cancer risks for the years following construction were calculated using TAC concentrations from emissions from operations. For the period from 2024 through ~~2030~~*2027*, TAC concentrations from emissions from operations were added to the TAC concentrations from emissions from construction for all years after the 2024 horizon year when operations of the first completed components of the proposed Project (e.g., APM, the CONRAC, the ITF West, the ITF East, and most of the roadway improvements) were assumed to commence. After construction is projected to be completed (the period from ~~2031~~ *2028* to 2035), incremental cancer risks were calculated using TAC concentrations from emissions from only operations. For exposure periods that extend beyond 30 years, 2035 horizon year TAC concentrations *are assumed to be constant and* were used for post-2035 exposure years.

TAC concentrations for operations were modeled for two horizon years – 2024 and 2035. For calculation of cancer risks for horizon year 2024, TAC concentrations were assumed to *change* (decrease *or increase*) linearly for 11 years from the 2024 horizon year to the 2035 horizon year and then remain constant at the 2035 TAC concentrations for the remainder of the exposure period. This is a conservative assumption because reduced emissions from fleet turnover to newer vehicles and the use of reformulated gasoline as well as the implementation of state and local regulations and programs targeted to mitigate emissions are likely to result in decreases in future emissions past 2035. *Horizon year 2035 is the final year that operations predictions are available. After year 2035, TAC concentrations and exposures are assumed to be constant.* ~~Finally, from 2035 on, operations only are included based on estimated 2035 emissions.~~

Combined construction and operational impacts were calculated as the sum of impacts for four exposure periods. Only construction impacts were assessed for the first 7 years of the project (2017 through 2024). For the next ~~7~~ *4* years (2024 through 20*27*~~30~~), construction and operational impacts were summed, using the appropriate years of the linear extrapolation between years 2024 and 2035 to evaluate operations., Between 20*28*~~30~~ and 2035, only operational impacts are

assessed, again using the appropriate years of the linear extrapolation between years 2024 and 2035. Finally, from 2035 on, operations only are included based on estimated 2035 emissions.

7. The last paragraph on page 4.2-78 of the Draft EIR is hereby revised as follows:

For the proposed Project, grid points were analyzed along the Airport fence-line and at intervals within the study area. In addition, several on-Airport grid points that are not located within the proposed Project boundaries were also modeled (for on-Airport/off-site workers) and in the center of LAX (for on-Airport/on-site construction workers). These locations represent maximally exposed individuals (MEI), based on dispersion modeling (see Section 4.2.1, Air Quality). *One goal of the HHRA is to identify the magnitude and location of greatest impacts of the proposed Project. To this end, c*~~C~~oncentrations of each TAC at these nodes were used in calculating cancer risk, and chronic and acute non-cancer health hazard estimates. These calculations were used to identify locations with maximum cancer risks and maximum non-cancer health hazards and serve as to assist determinations of significance.

8. The last sentence of the first full paragraph on page 4.2-79 of the Draft EIR is hereby revised as follows:

The modeled receptor locations are shown on **Figure~~s~~ 4.2.2-1** ~~and 4.2.2-2~~.

9. The paragraph under the heading Evaluating Cancer Risks on page 4.2-79 of the Draft EIR is hereby revised as follows:

Cancer risks were estimated by multiplying exposure estimates for carcinogenic chemicals by corresponding cancer slope factors. Results were risk estimates expressed as the probability of developing cancer *as a consequence of exposure to airport-related TAC emissions. These estimates do not include typical incidence of cancer in the US, which may be as high as 1 in 4 to 1 in 2*. An increased incremental cancer risk greater than, or equal to, 10 in one million (10 x 10-6) for potentially exposed off-site workers, residents, or school children was considered a significant impact. Cancer risks were based on an exposure duration of 30 years. Impacts of exposure to multiple TAC were accounted for by adding cancer risk estimates for exposure to all carcinogenic chemicals.

10. Figure 4.2.2-1: Construction Grid Point Locations on page 4.2-81 of the Draft EIR is hereby replaced with a corrected figure. Please see the following revised figure.

11. Figure 4.2.2-2: Operation Grid Point Locations on page 4.2-83 of the Draft EIR is hereby removed. Subsequent figures have been renumbered.

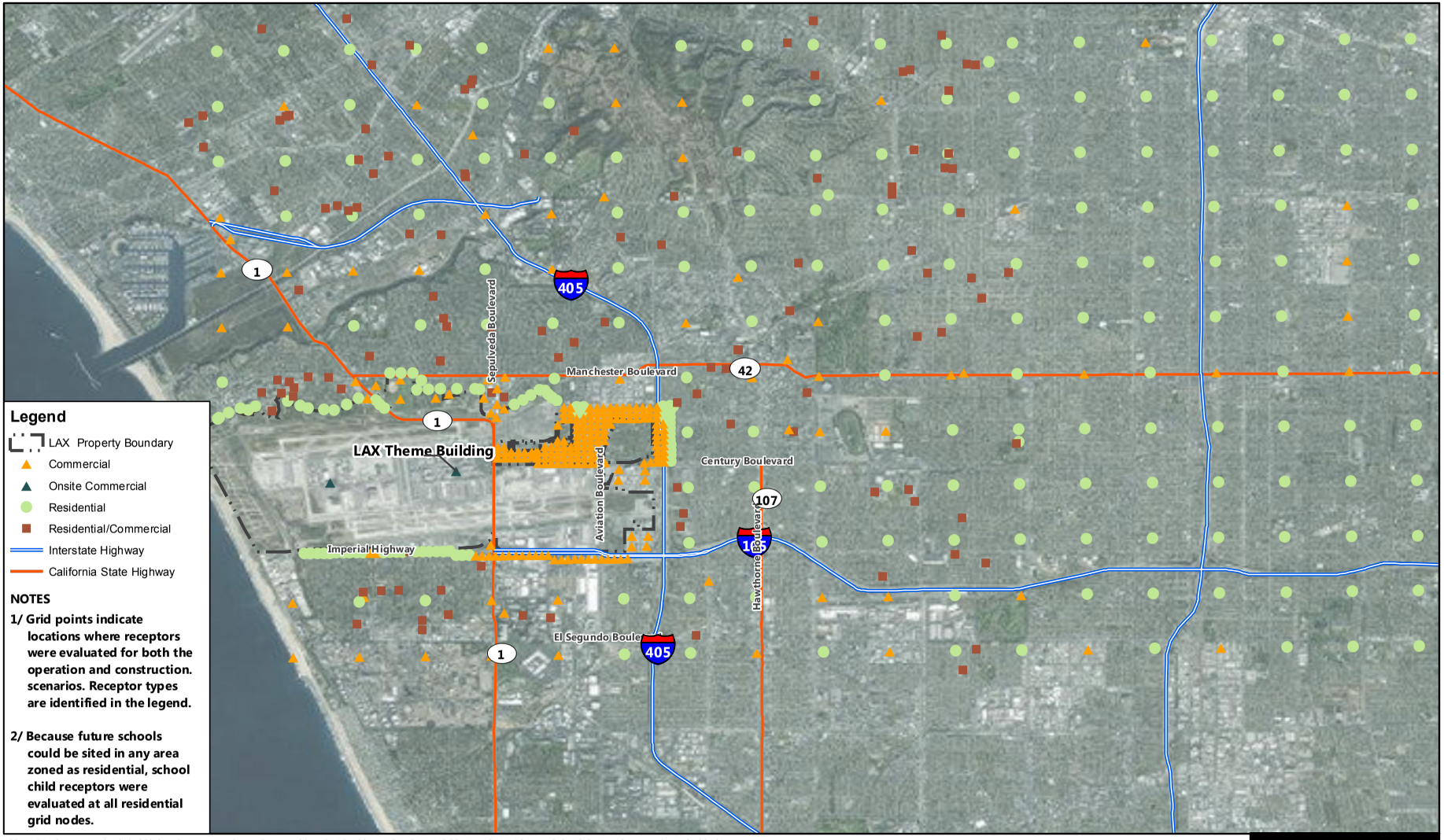
12. The two paragraphs under the heading Acute Non-Cancer Health Hazards on page 4.2-85 of the Draft EIR are hereby revised as follows:

> Acute non-cancer risk estimates were calculated by dividing estimated maximum 1-hour TAC concentrations in air by acute RELs. An acute REL is a concentration in air below which adverse effects are unlikely for people, including sensitive subgroups, exposed for a short time on an intermittent basis. In most cases, RELs are estimated on the basis of an 1-hour exposure duration. USEPA defines intermittent exposure as an exposure lasting less than 24 hours and occurring no more than monthly. RELs do not distinguish between adults and children, but are established at levels that are considered protective of sensitive populations. ~~Since m~~*M*argins of safety are incorporated *when developing RELs* to address data gaps and uncertainties, *and* exceeding ~~the~~*a* REL does not automatically indicate an adverse health impact. OEHHA has developed acute RELs for several of the TAC of concern.
>
> Short-term concentrations for TAC associated with construction of the proposed Project were estimated using the same AERMOD used to estimate annual average concentrations, but with the model option for 1-hour maximum concentrations selected. ~~These concentrations represent~~ *Modeling results identify locations where* the highest ~~predicted~~ concentrations of TAC *may occur, as well as estimated maximum concentrations throughout the study area*. Acute non-cancer health hazards were then estimated at each grid point by dividing estimated maximum 1-hour TAC concentrations in air by acute RELs. *As discussed above for chronic non-cancer health impacts, a*~~A~~ HI ~~equal to or~~ greater than 1, the threshold of significance for acute non-cancer health impacts, indicates some potential for adverse acute ~~non-cancer health~~ impacts. A HI *of or* less than 1 suggests that adverse acute non-cancer health impacts are unlikely.

13. The first paragraph under the Construction heading on page 4.2-92 of the Draft EIR is hereby revised as follows:

> For the construction scenario, ~~550~~ *970* grid points were analyzed within the study area in the vicinity of the Airport for each construction year from 2017 to 20*27*~~30~~. These locations are shown on Figure 4.2.2-1. In addition, risks and hazards for operations were added to the construction risks and hazards, for construction years 2024 to 20*27*~~30~~.

14. Table 4.2.2.2: Incremental Peak Construction-Related Cancer Risks for Maximally Exposed Individuals on page 4.2-92 of the Draft EIR has been revised. Please see the following revised table.




SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-1**

## Grid Point Locations

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**Table 4.2.2-2: Incremental Peak Construction-Related Cancer Risks for Maximally Exposed Individuals**

| RECEPTOR TYPE | CANCER RISKS (PER MILLION PEOPLE) | THRESHOLD (PER MILLION PEOPLE) | EXCEEDS THRESHOLD? |
|---|---|---|---|
| Adult Resident, 30 years | ***16*** ~~**23**~~ | 10 | **Yes** |
| Child Resident, 9 years | ***34*** ~~**54**~~ | 10 | **Yes** |
| School Child, 12 years | *8* ~~13~~ | 10 | *No* ~~**Yes**~~ |
| Adult Worker, 25 years | 3 | 10 | No |

SOURCE: CDM Smith, September 2016, (*as revised February 2017).*
PREPARED BY: CDM Smith, September 2016, *as revised February 2017*.

15. The four paragraphs under the *Residents (Adult and Child)* heading on pages 4.2-92 and 4.2-93 of the Draft EIR are hereby revised as follows:

For construction-related cancer risks, adult and child residents were evaluated at 3*48*~~33~~ residential and residential/commercial grid nodes.[25] Because construction of the proposed Project is ~~estimated~~ *assumed* to be *11*~~14~~ years, incremental cancer risk for adult residents was estimated assuming *11*~~14~~ years of construction and with operation overlapping the construction starting in 2024; following completion of construction, it was assumed that adult residents were exposed to operations for the remaining 1*9*~~6~~ years of the 30-year exposure period.

Since the exposure period for a child resident is 9 years, which is less than the *11*~~14~~-year construction scenario, the cancer risk for child residents was calculated over *a couple* ~~several~~ periods within the *11*~~14~~-year time frame to determine which period would result in the maximum cancer risk for the child resident. It was determined that the maximum cancer risk for a child resident would occur for the 9-year exposure period from 2019 to 2027 for the unmitigated construction scenario.

Incremental cancer risk for an adult resident at the peak location during construction is estimated to be *16*~~23~~ in one million, exceeding the threshold of significance of 10 in one million. DPM would contribute to the majority of the cancer risk (~~94~~ *82* percent) followed by *1,3-butadiene (contributing 8 percent), benzene (contributing 6 percent),* and hexavalent chromium, contributing *3*~~4~~ percent. DPM is primarily an emission from diesel construction equipment, haul trucks, and concrete trucks. The peak cancer risk location for adult residents is shown on **Figure 4.2.2-*2*~~3~~**.

Incremental cancer risk for a child resident at the peak location during construction is estimated to be ~~5~~*34* in one million, exceeding the threshold of significance of 10 in one million. DPM would contribute to the majority of the cancer risk (9*6*~~1~~ percent) followed by *1,3-butadiene (contributing 2 percent), benzene (contributing 1 percent),* and hexavalent chromium, contributing *1*~~6~~ percent. The peak cancer risk location for child residents is shown on **Figure 4.2.2-*3*~~4~~**.

[25] Residents were evaluated at residential and residential/commercial grid nodes. They were not evaluated at the fence-line and commercial grid nodes.

16. The four paragraphs under the *School Child* heading on page 4.2-93 of the Draft EIR are hereby revised as follows:

Receptor locations for school children were conservatively evaluated at all 3*48*~~33~~ residential and residential/commercial locations assuming that schools could be constructed in these areas in the future. Schools do not currently exist at all of these locations, and school sites must meet LAUSD criteria before a public school can be established. However, evaluating all possible locations within the study area that might be used for schools in the future is well beyond the scope of this assessment. As calculated, the assessment will provide risk information for the future should school sites within the study area be considered.

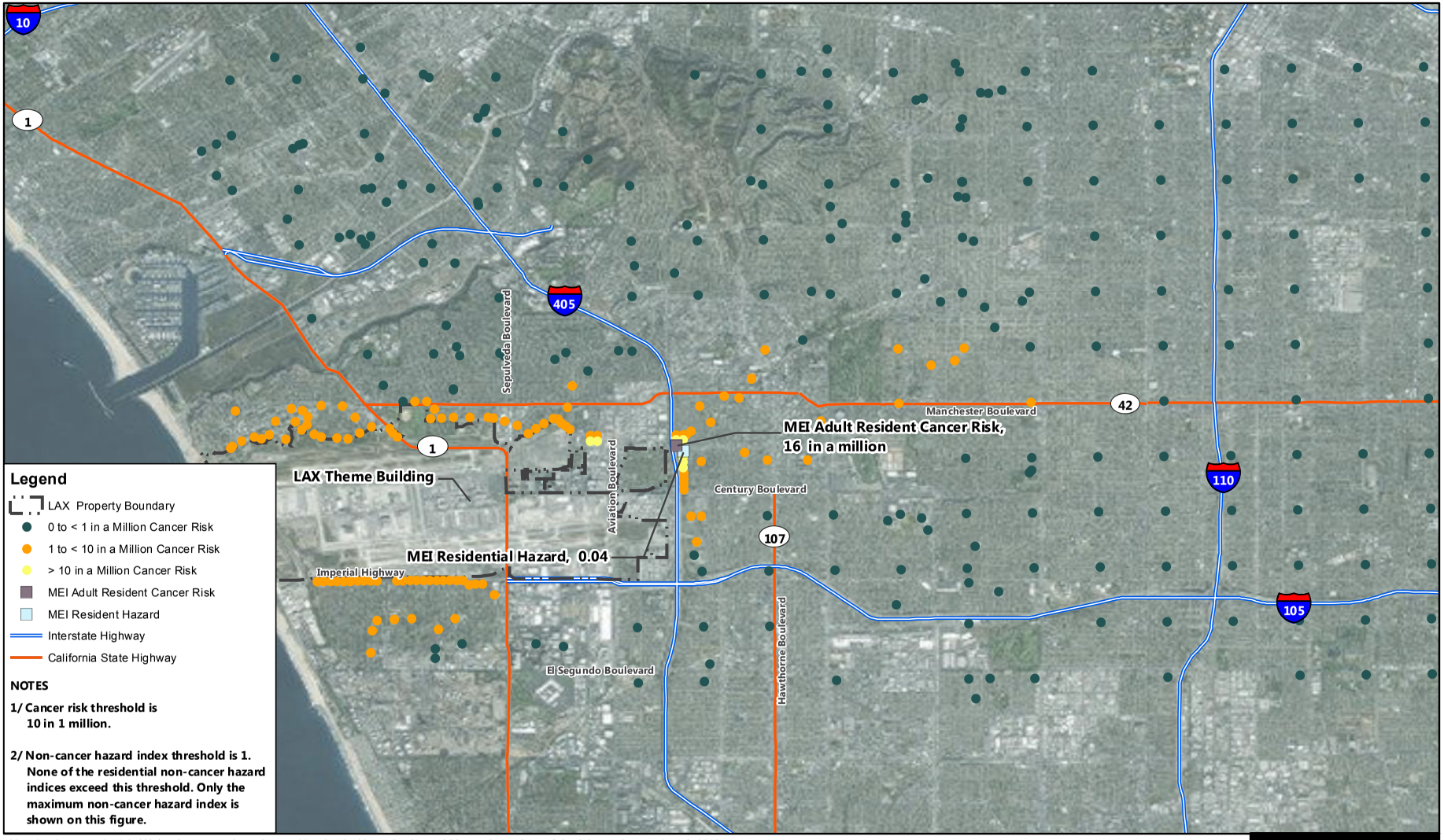
For construction-related cancer risks, school children were evaluated for a 12-year exposure scenario. Because construction of the project is estimated to be *11*~~14~~ years, incremental cancer risk for the school child was estimated assuming 1*1*~~2~~ years of construction, with years of operation overlapping the construction starting in 2024*; following completion of construction, it was assumed that school children were exposed to operations for the remaining 1 year of the 12-year exposure period.* ~~Calculations indicated that the peak 12-year exposure period for the school child was 2019 to 2030.~~

Incremental cancer risks for children attending schools at the peak location were estimated to be ~~13~~*8* in one million, ~~exceeding~~ *below* the threshold of significance of 10 in one million. ~~DPM would contribute to the majority of the cancer risk (88 percent) followed by hexavalent chromium, contributing 9 percent.~~ The peak cancer risk location is shown on **Figure 4.2.2-*4*~~5~~**.

Grid locations that were evaluated include all residential or residential/commercial locations ~~s~~ because schools could be constructed in these areas in the future. Schools do not currently exist at all of these locations. The closest existing school with peak cancer risks would be Oak Street Elementary School. During the construction period, peak cancer risks at the existing Oak Street Elementary School are estimated to be ~~8~~*3* in one million, below the threshold of significance of 10 in one million. The location of Oak Street Elementary School is shown on Figure 4.2.2-*4*~~5~~. Since the school is an elementary school that provides instruction for children from kindergarten through sixth grade (i.e., 7 years), actual exposure for the school child would be less than the 12-year exposure scenario that was modeled.

17. Figure 4.2.2-3: Construction Unmitigated – 30 Year Adult Residential Incremental Cancer Risk on page 4.2-95 of the Draft EIR is hereby renumbered to **Figure 4.2.2-2** and replaced with a corrected figure. Please see the following revised figure.

18. Figure 4.2.2-4: Construction Unmitigated – 9 Year Child Residential Incremental Cancer Risk on page 4.2-97 of the Draft EIR is hereby renumbered to **Figure 4.2.2-3** and replaced with a corrected figure. Please see the following revised figure.




SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-2**

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## Construction Unmitigated – 30-year Adult Residential Incremental Cancer Risk

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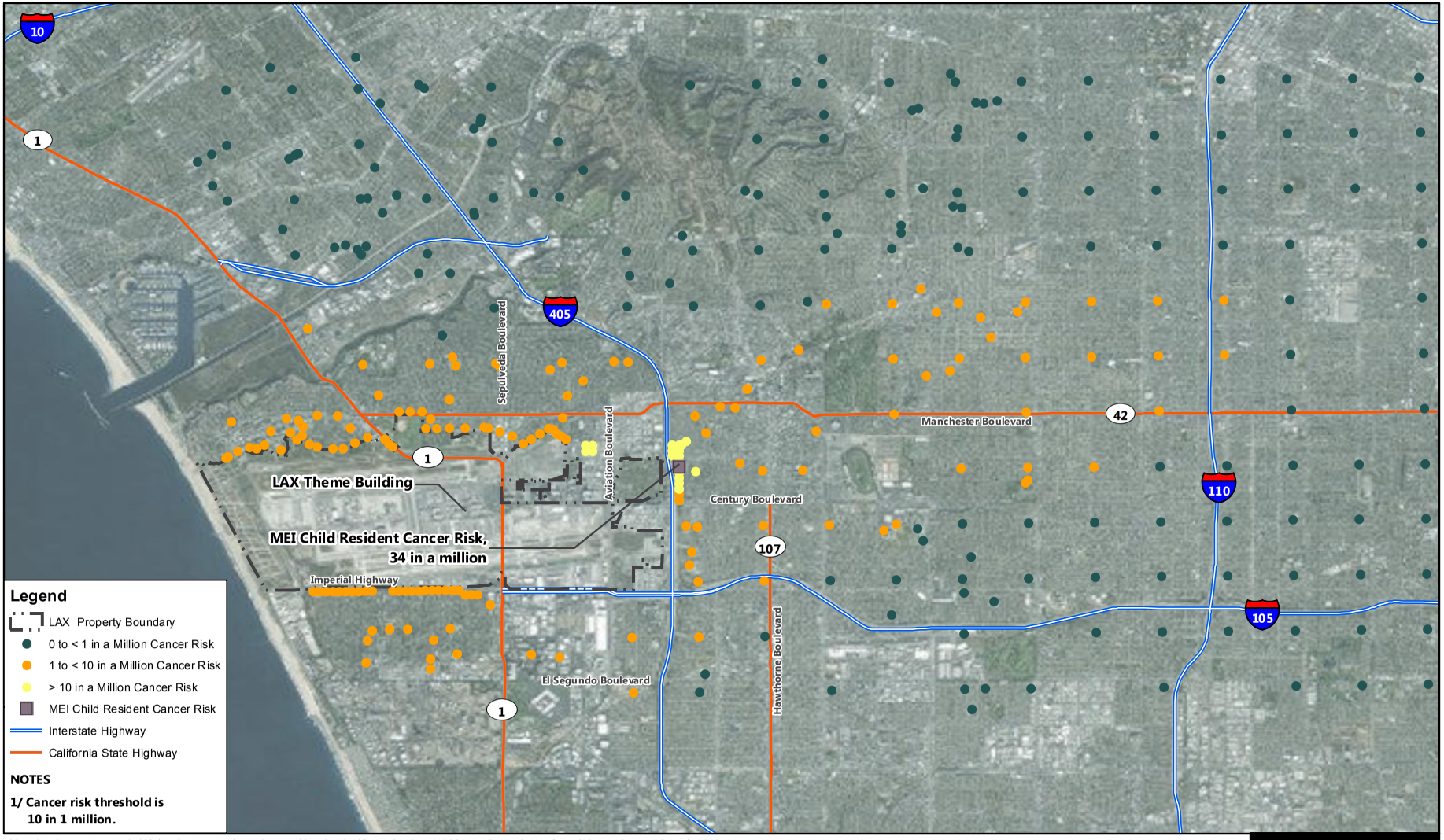


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-3**

## Construction Unmitigated – 9-year Child Residential Incremental Cancer Risk

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19. Figure 4.2.2-5: Construction Unmitigated – 12 Year School Child Incremental Cancer Risk on page 4.2-99 of the Draft EIR is hereby renumbered to **Figure 4.2.2-4** and replaced with a corrected figure. Please see the following revised figure.

20. The two paragraphs under the *Adult Worker* heading on page 4.2-101 of the Draft EIR are hereby revised as follows:

> For the construction scenario, adult workers were evaluated at ~~338~~ *367* off-airport grid nodes and 2 on-airport/off-site grid nodes. Because the exposure period of the adult worker is 25 years and construction of the project is ~~estimated~~ *assumed* to be *11*~~14~~ years, incremental cancer risk for the worker was estimated assuming 7 years of construction, ~~7~~ *4* years of construction and operations (the incremental difference between the 2024 Future With Project scenario and the 2024 Future Without Project), and 1*4*~~1~~ years of operations, including *7*~~4~~ years of the 2024 Future With Project operations and 7 years of the 2035 Future With Project operations.
>
> Construction-related cancer risks for adult workers at the peak off-airport location are estimated to be *4*~~3~~ in one million. Overall, Project-related cancer risks for the proposed Project for adult workers would be below the threshold of significance. The peak location of construction-related cancer risks is shown on **Figure 4.2.2-*5*~~6~~**.

21. The paragraph under the *Chronic Non-Cancer Health Hazards* heading on page 4.2-101 of the Draft EIR is hereby revised as follows:

> Project-related chronic non-cancer hazard indices for construction impacts associated with the proposed Project are provided in **Table 4.2.2-*2*~~3~~**. Hazard indices are shown for each year of construction. *Since non-cancer hazard estimates are proportional to dose rate over a chronic time frame, no combination of years during construction will result in a hazard index greater than the maximum one year estimate. HI estimates would be averaged to calculate a chronic value, resulting in chronic HI less than the maximum 1-yr value.* As shown, chronic non-cancer human health hazards would be less than significant for both residents and workers.

22. The paragraph under the *Residents (Adult and Child) and School Children* heading on page 4.2-101 of the Draft EIR is hereby revised as follows:

> The maximum HI for a resident living at the peak hazard location for a single year of construction of the proposed Project is 0.0*4*~~3~~, projected to occur in 202*1*~~6~~. The peak residential hazard location is shown on Figure 4.2.2-*2*~~3~~. Non-cancer hazard indices for adult residents and child residents are the same because the OEHHA methodology does not normalize hazard indices to body weight. As shown in Table 4.2.2-3, all incremental chronic non-cancer health hazards for residential adults and for young children are would be below the significance threshold of 1.

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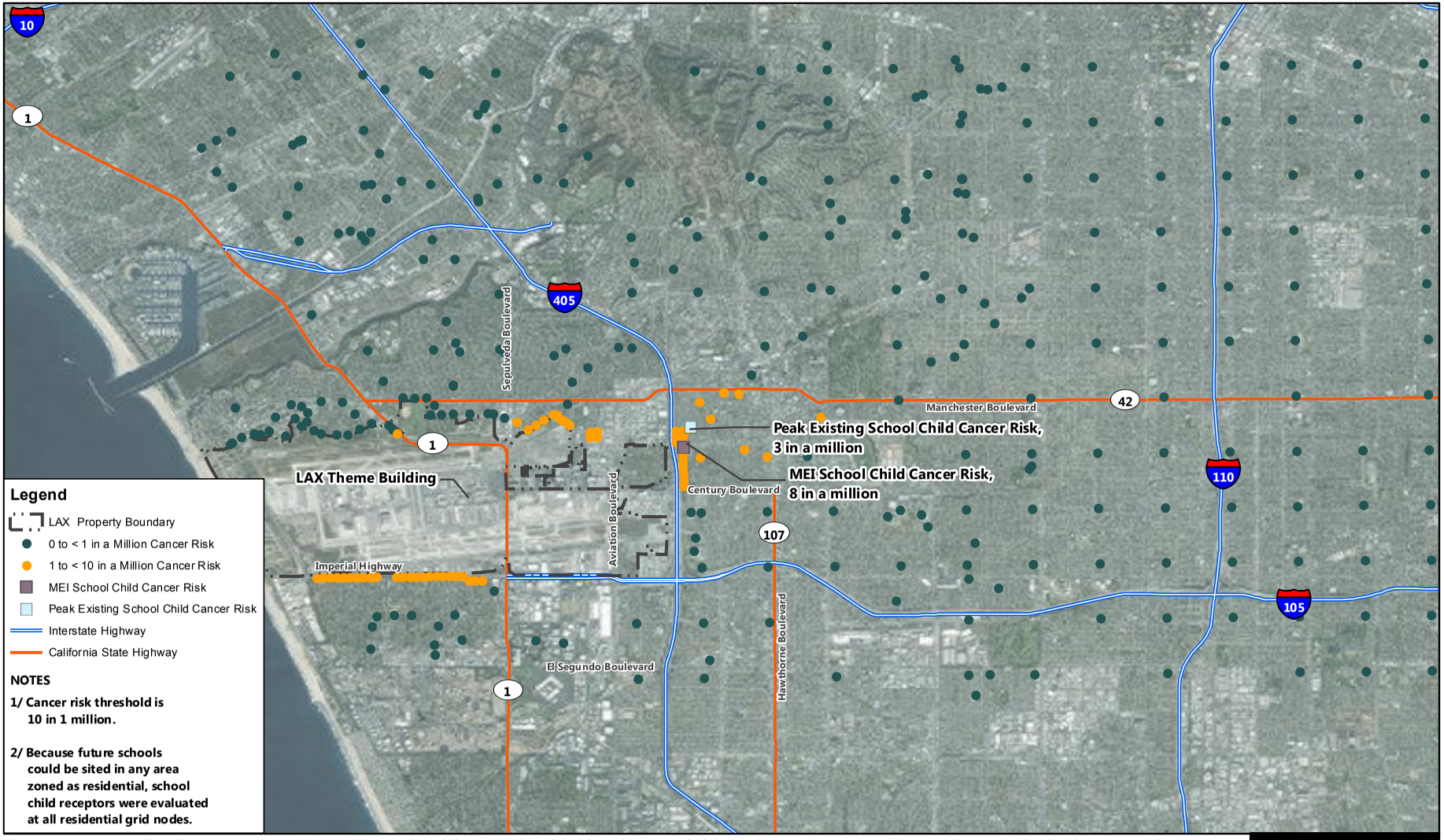


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-4**

## Construction Unmitigated – 12-year School Child Incremental Cancer Risk

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23. The heading and paragraph under the *HI Adult Worker* heading on page 4.2-101 of the Draft EIR is hereby revised as follows:

*~~HI~~ Adult Worker*

The maximum HI for an adult worker at the peak hazard location for a single year of construction of the proposed Project is 0.*24*~~5~~, projected to occur in 20*19*~~20~~. The peak commercial hazard location is shown on Figure 4.2.2-*5*~~6~~. All incremental chronic non-cancer health hazards for adult workers would be below the significance threshold of 1.

24. Figure 4.2.2-6: Construction Unmitigated – 25 Year Off-Airport Worker Incremental Cancer Risk on page 4.2-103 of the Draft EIR is hereby renumbered to **Figure 4.2.2-5** and replaced with a corrected figure. Please see the following revised figure.

25. Table 4.2.2-3: Incremental Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from Project Construction on page 4.2-105 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.2.2-3: Incremental Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from Project Construction**

| YEAR | RESIDENT[1/] | ADULT WORKER[1/] | SIGNIFICANCE THRESHOLD | EXCEEDS THRESHOLD? |
|---|---|---|---|---|
| 2017 | 0.00*06*~~3~~ | 0.0*08*~~1~~ | 1 | No |
| 2018 | 0.0*4*~~5~~ | 0.*21*~~28~~ | 1 | No |
| 2019 | 0.*03*~~16~~ | 0.24~~37~~ | 1 | No |
| 2020 | 0.*0422* | 0.*08*~~50~~ | 1 | No |
| 2021 | 0.*04*~~17~~ | 0.*10*~~43~~ | 1 | No |
| 2022 | 0.*04*~~14~~ | 0.*11*~~40~~ | 1 | No |
| 2023 | 0.0*7* | 0.*04*~~16~~ | 1 | No |
| 2024 | 0.*03*~~27~~ | 0.*09*~~27~~ | 1 | No |
| 2025 | 0.*03*~~28~~ | 0.*09*~~31~~ | 1 | No |
| 2026 | 0.*03*~~29~~ | 0.*08*~~34~~ | 1 | No |
| 2027 | 0.*04*~~28~~ | 0.*09*~~32~~ | 1 | No |
| ~~2028~~ | ~~0.28~~ | ~~0.31~~ | ~~1~~ | ~~No~~ |
| ~~2029~~ | ~~0.26~~ | ~~0.27~~ | ~~1~~ | ~~No~~ |
| ~~2030~~ | ~~0.26~~ | ~~0.26~~ | ~~1~~ | ~~No~~ |

NOTE:

1/ Hazard indices are unitless.

SOURCE: Appendix F of this EIR (*as revised February 2017)*
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

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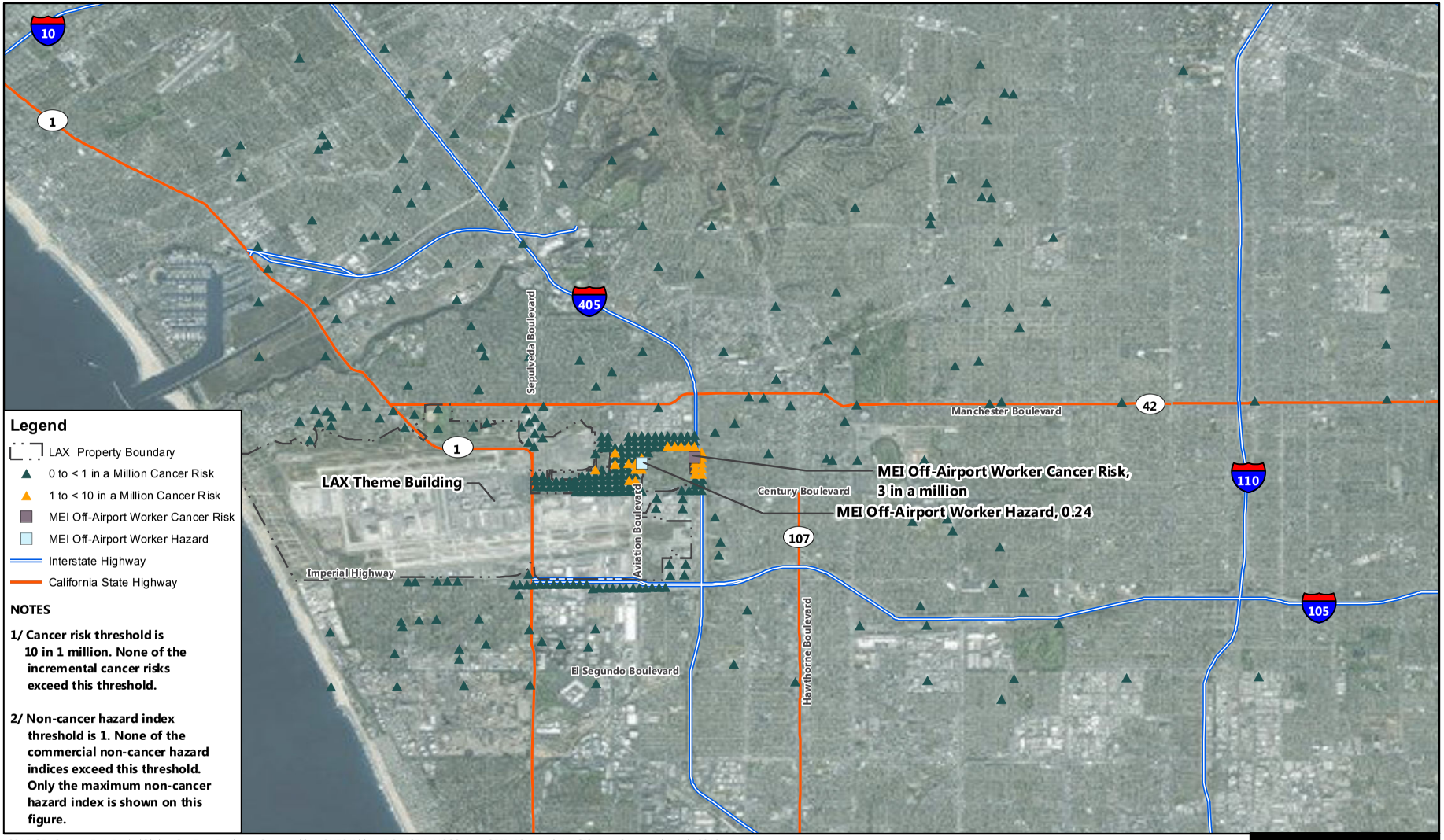


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-5**

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## Construction Unmitigated – 25-year Off-Airport Worker Incremental Cancer Risk

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26. The second through fourth paragraphs under the Acute Non-Cancer Health Hazards on pages 4.2-105 and 4.2-106 of the Draft EIR are hereby revised as follows:

Acute non-cancer health hazards were evaluated for two peak emission years of construction – 201*8*~~9~~ and 20*19*~~20~~. The year 2018~~9~~ is estimated to have the peak diesel exhaust emissions and the year 20*19*~~20~~ is estimated to have the peak construction dust emissions for particulate matter. ~~In general, the peak years have nearly twice the emissions of the next closest year.~~

A HI equal to or greater than 1 would indicate possible acute adverse health effects. For the off-site worker~~, the hazard quotient for acute exposure to manganese during construction is equal to 1;~~ all ~~other~~ hazard quotients are less than 1. ~~The acute REL for manganese is set at or below a level at which no adverse health impacts are expected for the majority of the population and includes an uncertainty factor of 300. Hence, no health impacts are expected. Also, note that the target organ for acute toxicity of manganese is the nervous system and its actions would not be expected to be additive to the effects of acrolein and formaldehyde which target the respiratory system.~~ Formaldehyde, *benzene,* and manganese are the ~~only~~ chemicals with *the highest* acute HI estimates, *all less than* ~~close to~~ the threshold of one. No additive impacts from exposure to ~~manganese and~~ other site related TAC are expected.

Formaldehyde and *benzene*~~manganese~~ are responsible for *4*5 to *66*~~47~~ percent and *29*~~30~~ to *51*~~84~~ percent, respectively, of *the total* ~~all~~ predicted construction-related acute non-cancer health hazards *for organics*. Acrolein is only responsible for 0.*5*~~04~~ to *2*~~0.4~~ percent of *the total*~~all~~ predicted acute non-cancer health hazards *for organics* associated with construction of the proposed Project. ~~Benzene~~*Manganese* and nickel have ~~greater~~ contributions *of* ~~(~~*79*~~2~~ to *85*~~1~~4 percent and *10*4 to *15*~~7~~ percent, respectively,~~)~~ to the total acute non-cancer hazard *for particulates*~~than acrolein, though insignificant when compared to formaldehyde and manganese~~. Acrolein, which is associated with aircraft operations, results are *mentioned*~~shown~~ here for informational purposes because it has historically been a TAC of concern for acute non-cancer health hazards for other LAX projects. Maximum acute non-cancer health hazards associated with exposure to th~~ese three~~ chemicals *with the greatest acute non-cancer health hazards (manganese, benzene, and formaldehyde)* from the proposed Project construction are summarized in **Table 4.2.2-4**.

27. Table 4.2.2-4: Construction-Related Acute Non-Cancer Health Hazards on page 4.2-106 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.2.2-4: Construction-Related Acute Non-Cancer Health Hazards**

| | MANGANESE[1/] | ~~ACROLEIN~~ *BENZENE*[1/] | FORMALDEHYDE[1/] | SIGNIFICANCE THRESHOLD | EXCEEDS THRESHOLD? |
|---|---|---|---|---|---|
| On-Site Worker | 0.02~~3~~ – 0.2~~1~~ | 0.002~~01~~ – 0.009~~1~~ | 0.003~~2~~ – 0.008~~2~~ | 1 | No |
| Off-Site Worker | 0.001~~3~~ – 0.2~~1.0~~ | 0.0002~~01~~ – 0.0~~0~~3 | 0.003~~1~~ – 0.05~~1~~ | 1 | No |
| Residential | 0.0008~~2~~ – 0.0~~9~~7 | 0.00007~~06~~ – 0.01~~0~~04 | 0.0001~~8~~ – 0.02~~5~~ | 1 | No |

NOTE:

1/ Hazard indices are unitless.

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

28. The paragraph under the Occupation Effects heading on page 4.2-106 of the Draft EIR is hereby revised as follows:

> Impacts to on-site workers during construction were evaluated by comparing estimated 8-hour air concentrations of TAC at the on-site location under the proposed Project for construction to the CalOSHA 8-hour PEL-TWAs. Two years were selected as the peak emission years – 201*8*~~9~~ and 20*19*~~20~~. The year 201*8*~~9~~ is estimated to have the peak diesel exhaust emissions and the year 20*19*~~20~~ is estimated to have the peak construction dust emissions for particulate matter. ~~In general, the peak years have nearly twice the emissions of the next closest year.~~ As shown in **Table 4.2.2-5**, the resulting 8-hour concentrations are a few to several orders of magnitude below PELs for all TAC. This means that air concentrations from airport emissions with construction of the proposed Project would not exceed those considered "acceptable" by CalOSHA standards, and construction impacts on workers' health would be less than significant.

29. Table 4.2.2-5: Comparison of CalOSHA Permissible Exposure Limits to Maximum Estimated 8-Hour On-Site Air Concentrations for Construction on page 4.2-107 of the Draft EIR has been revised. Please see the following revised table.

## Table 4.2.2-5: Comparison of CalOSHA Permissible Exposure Limits to Maximum Estimated 8-Hour On-Site Air Concentrations for Construction

| TAC[1/] | CALOSHA PEL TWA (ug/m$^3$) [2/] | 2018~~9~~[3/] | 2019~~20~~[3/] |
|---|---|---|---|
| 1,2,4-Trimethylbenzene | 12,5000 | *0.00737* ~~0.1338~~ | *NA* ~~0.1467~~ |
| 1,3-Butadiene | 2,200 | *0.00270* ~~0.0488~~ | *NA* ~~0.0549~~ |
| 2,2,4-Trimethylpentane | N/A | *0.00474* ~~0.0835~~ | *NA* ~~0.1033~~ |
| Acetaldehyde | 45,000 | *0.09793* ~~1.7978~~ | *NA* ~~1.8829~~ |
| Acrolein | 250 | *0.00004* ~~0.0006~~ | *NA* ~~0.0015~~ |
| Benzene | 324 | *0.05021* ~~0.5179~~ | *NA* ~~0.5607~~ |
| Cumene | 245,000 | *0.00027* ~~0.0049~~ | *NA* ~~0.0053~~ |
| Cyclohexane | 1,050,000 | *0.00060* ~~0.0101~~ | *NA* ~~0.0148~~ |
| Ethyl Benzene | 22,000 | *0.00447* ~~0.0804~~ | *NA* ~~0.0914~~ |
| Ethylene | N/A | *0.19347* ~~3.5431~~ | *NA* ~~3.7510~~ |
| Formaldehyde | 375 | *0.19633* ~~3.6026~~ | *NA* ~~3.7801~~ |
| Hexane | 180,000 | *0.00264* ~~0.0462~~ | *NA* ~~0.0593~~ |
| Isoprene | N/A | *0.00005* ~~0.0006~~ | *NA* ~~0.0016~~ |
| Methanol | 260,000 | *0.00044* ~~0.0079~~ | *NA* ~~0.0090~~ |
| Methyl Ethyl Ketone {2-Butanone} | 590,000 | *0.01971* ~~0.3619~~ | *NA* ~~0.3788~~ |
| Naphthalene | 500 | *0.00121* ~~0.0222~~ | *NA* ~~0.0236~~ |
| Propionaldehyde | N/A | *0.01292* ~~0.2373~~ | *NA* ~~0.2485~~ |
| Propylene | N/A | *0.03560* ~~0.6490~~ | *NA* ~~0.7002~~ |
| Styrene | 215,000 | *0.00084* ~~0.0152~~ | *NA* ~~0.0167~~ |
| Toluene | 37,000 | *0.02142* ~~0.3847~~ | *NA* ~~0.4424~~ |
| Aluminum | 2,000 | *NA* ~~0.4790~~ | *1.25986* ~~0.4051~~ |
| Ammonium | 18,000 | *NA* ~~0.0352~~ | *0.02603* ~~0.0229~~ |
| Antimony | 500 | *NA* ~~0.0005~~ | *0.00051* ~~0.0003~~ |
| Arsenic | 10 | *NA* ~~0.0002~~ | *0.00037* ~~0.0002~~ |
| Barium | 500 | *NA* ~~0.0566~~ | *0.09907* ~~0.0612~~ |
| Bromine | 700 | *NA* ~~0.0004~~ | *0.00070* ~~0.0003~~ |
| Cadmium | 5 | *NA* ~~0.0006~~ | *0.00080* ~~0.0004~~ |
| Chlorine | 1,500 | *NA* ~~0.0317~~ | *0.07096* ~~0.0278~~ |
| Chromium | 5 | *NA* ~~0.0001~~ | *0.00027* ~~0.0001~~ |
| Cobalt | 20 | *NA* ~~0.0008~~ | *0.00190* ~~0.0007~~ |
| Copper | 1,000 | *NA* ~~0.0115~~ | *0.02017* ~~0.0126~~ |
| Lead | 50 | *NA* ~~0.0040~~ | *0.00976* ~~0.0033~~ |
| Manganese | 200 | *NA* ~~0.0078~~ | *0.01826* ~~0.0069~~ |
| Mercury | 25 | *NA* ~~0.0004~~ | *0.00048* ~~0.0003~~ |
| Nickel | 500 | *NA* ~~0.0012~~ | *0.00223* ~~0.0012~~ |
| Phosphorus | 100 | *NA* ~~0.0115~~ | *0.02785* ~~0.0095~~ |
| Selenium | 200 | *NA* ~~0.0001~~ | *0.00015* ~~0.0001~~ |
| Silicon | 5,000 | *NA* ~~1.3128~~ | *3.35708* ~~1.1230~~ |
| Silver | 10 | *NA* ~~0.0003~~ | *0.00033* ~~0.0002~~ |
| Sulfates | NA | *NA* ~~0.2626~~ | *0.28872* ~~0.2013~~ |
| Thallium | 100 | *NA* ~~0~~ | 0 |
| Vanadium (Fume Or Dust) | 50 | *NA* ~~0.0026~~ | *0.00562* ~~0.0023~~ |
| Zinc | NA | *NA* ~~0.0092~~ | *0.01545* ~~0.0072~~ |
| Xylenes | 435,000 | *0.01553* ~~0.2779~~ | *NA* ~~0.3240~~ |

NOTES: NA = Not Available

1/ All TACs for which PEL-TWAs are available are listed. PEL-TWAs are not available for 2,2,4-trimethylpentane, ethylene, isoprene, propionaldehyde, propylene, sulfates, zinc and diesel exhaust.

2/ California Occupational Safety and Health Administration. ,*Table AC-1, Permissible Exposure Limits for Chemical Contaminants*, 2008,Available: http://www.dir.ca.gov/title8/5155table_ac1.html.

3/ Concentrations are for Theme Building at grid point *404*~~855~~. *Only organics were modeled in 2018 and only particulates were modeled in 2019 for the 8-hour scenarios.*

SOURCE: Appendix F of this EIR (*as revised February 2017*)

PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

30. The first paragraph under the *Cancer Risks* heading on page 4.2-108 of the Draft EIR is hereby revised as follows:

> To determine the population-wide risks, Project-related risks for construction impacts were evaluated for the 70-year residential scenario. The risks were plotted and cancer risk isopleths determined to identify the 1 in a million zone of impact. Using the 201*4*~~5~~ population by census tract (estimated from the 2010 census population available from the U.S. Census[2]) cross-referenced with the calculated cancer risks, the cancer burden was calculated for each zone of impact. The total cancer burden for the Project was determined as the sum of individual census tract cancer burdens. As shown in **Table 4.2.2-6**, the zone of impact of 1 in a million ($10^{-6}$), shown in **Figure 4.2.2-*~~7~~6*** for the evaluated scenarios would have a cancer burden below the threshold of significance of 0.5.

[2] U.S. Department of Commerce, U.S. Census Bureau, Available: http://www.census.gov/.

31. Table 4.2.2-6: Construction-Related Cancer Burden on page 4.2-108 of the Draft EIR has been revised to reflect updated modeling resulting from incorporation of recommended SCAQMD mitigation refinements and minor corrections to modeling. Please see the following revised table.

**Table 4.2.2-6: Construction-Related Cancer Burden**

| ZONE OF IMPACT | CANCER BURDEN | THRESHOLD | EXCEEDS THRESHOLD? |
|---|---|---|---|
| Within 1 in a million | 0.*1*~~4~~ | 0.5 | No |

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

32. The paragraph under the **Operations** heading on page 4.2-108 of the Draft EIR is hereby revised as follows. The Draft EIR incorrectly reported that 1,439 grid points were used, while Appendix F correctly identified that 955 grid points were used in the Draft EIR analyses. For the Final EIR, 970 grid points were used:

> For future operations, including the 2024 and 2035 horizon years, ~~1,439~~*970* grid points were analyzed along the Airport fence-line and within the study area in the vicinity of the Airport. These locations are shown on Figure 4.2.2-*1*~~2~~. The modeling grid for operations *and* ~~varies from~~ the construction modeling grid *are the same.* ~~in order to include traffic impacts from nearby roadways. In addition, r~~*R*isks and hazards for operations were added to the construction risks and hazards, for years 2024 and beyond.

33. The second sentence of the first paragraph under the Cancer Risks heading on page 4.2-108 of the Draft EIR is hereby revised as follows:

> As shown, operation-related cancer risks would be below the threshold of significance for all receptors for the 2024 Future With Project vs. 2024 Future Without Project scenario and ~~for the adult resident~~ for the 2035 Future With Project vs. 2035 Future Without Project scenario.

34. Figure 4.2.2-7: Construction Unmitigated - Cancer Burden on page 4.2-109 of the Draft EIR is hereby renumbered to **Figure 4.2.2-6** and replaced with a corrected figure. Please see the following revised figure.

35. Table 4.2.2-7: Incremental Peak Operation-Related Cancer Risks for Maximally Exposed Individuals on page 4.2-111 of the Draft EIR has been revised to reflect updated modeling resulting from incorporation of recommended SCAQMD mitigation refinements and minor corrections to modeling. Please see the following revised table.

**Table 4.2.2-7: Incremental Peak Operation-Related Cancer Risks for Maximally Exposed Individuals**

| RECEPTOR TYPE | CANCER RISKS (PER MILLION PEOPLE) | THRESHOLD (PER MILLION PEOPLE) | EXCEEDS THRESHOLD? |
|---|---|---|---|
| **2024 FUTURE WITH PROJECT VS. 2024 FUTURE WITHOUT PROJECT** | | | |
| Adult Resident, 30 years | 8 | 10 | No |
| Child Resident, 9 years | *5* ~~8~~ | 10 | No |
| School Child, 12 years | *2* ~~3~~ | 10 | No |
| Adult Worker, 25 years | 1 | 10 | No |
| **2035 FUTURE WITH PROJECT VS. 2035 FUTURE WITHOUT PROJECT** | | | |
| Adult Resident, 30 years | *8* ~~4~~ | 10 | No |
| Child Resident, 9 years | *6* ~~3~~ | 10 | No |
| School Child, 12 years | *3* ~~1~~ | 10 | No |
| Adult Worker, 25 years | *1* ~~0.8~~ | 10 | No |

*NOTE: Values in this table are for 2024 operations scenario with unmitigated construction for 2024 to 2027. Values for 2024 operations scenario with mitigated construction (results provided in the attachments) would be less.*

SOURCE: Appendix F of this EIR (*as revised February 2017)*
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

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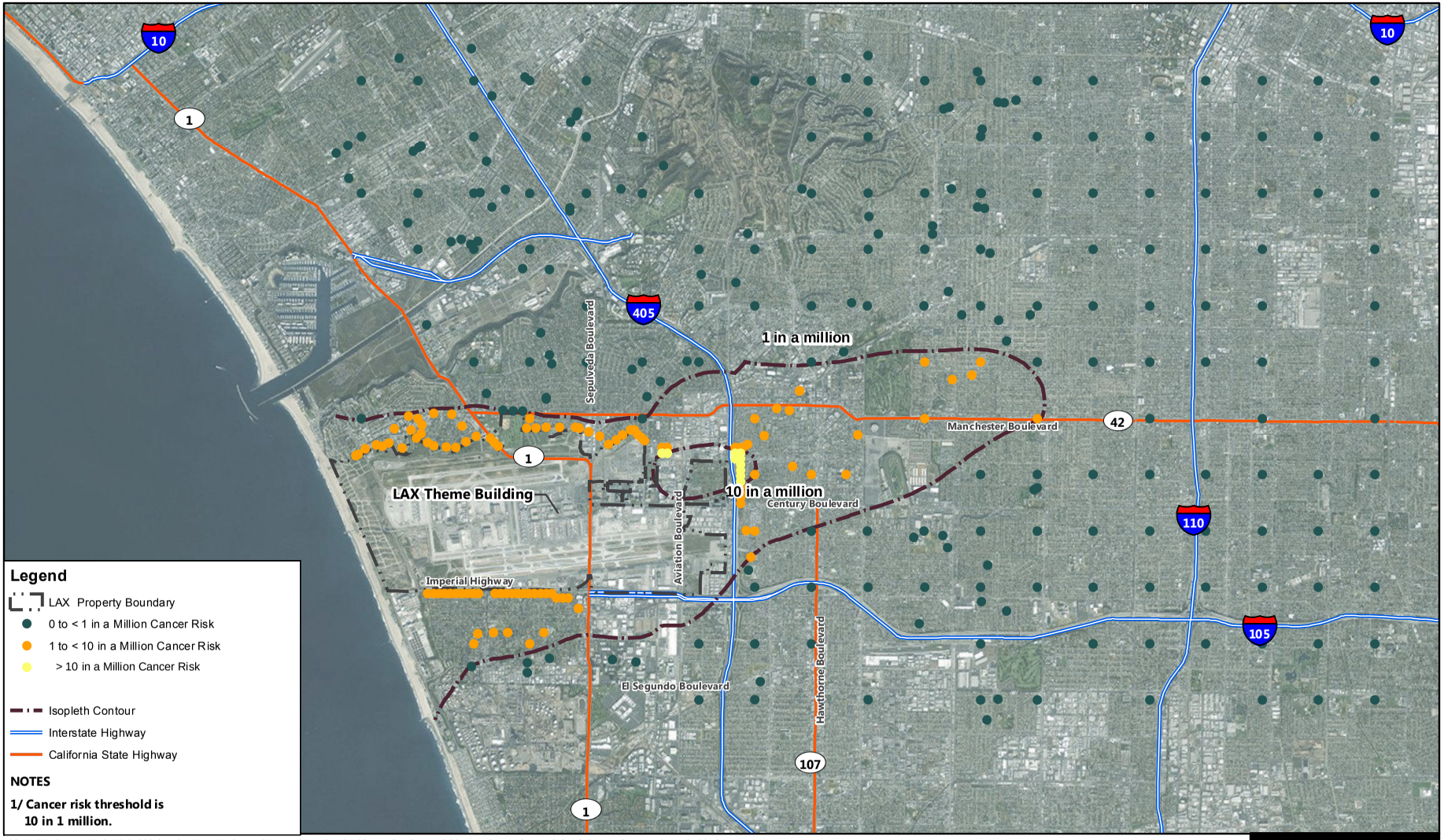


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4.2.2-6**

## Construction Unmitigated – Cancer Burden

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36. The first paragraph under the *2024 Future With Project vs. 2024 Future Without Project Scenario* heading on page 4.2-111 of the Draft EIR is hereby revised as follows:

> For operations, residents were evaluated at ~~333~~ *348* off-Airport grid nodes.[28] As compared to the 2024 Future Without Project scenario, the 2024 Future With Project would result in an incremental cancer risk for a child resident of ~~8~~*5* in one million, and an incremental cancer risk for an adult resident of 8 in one million. An exposure period for child residents was assumed to be 9 years; exposure for adult residents was assumed to be 30 years. These estimates show that Project-related cancer risks for adults and for young children would be below the threshold of significance of 10 in one million. Peak locations for an adult and for a child are shown on **Figures 4.2.2-~~8~~*7*** and **4.2.2-~~9~~*8***, respectively.
>
> [28] Residents were evaluated at residential and residential/commercial grid nodes. They were not evaluated at the fence-line and commercial grid nodes.

37. Figure 4.2.2-8: 2024 Future With Project Scenario vs. 2024 Future Without Project Scenario - 30-year Adult Residential Incremental Cancer Risk on page 4.2-113 of the Draft EIR is hereby renumbered to **Figure 4.2.2-7** and replaced with a corrected figure. Please see the following revised figure.

38. Figure 4.2.2-9: 2024 Future With Project Scenario vs. 2024 Future Without Project Scenario - 9-year Child Residential Incremental Cancer Risk on page 4.2-115 of the Draft EIR is hereby renumbered to **Figure 4.2.2-8** and replaced with a corrected figure. Please see the following revised figure.

39. The first sentence of the first paragraph under the *2035 Future With Project vs. 2035 Future Without Project Scenario* heading on page 4.2-117 of the Draft EIR is hereby revised as follows:

> Under the 2035 Future With Project scenario compared to the 2035 Future Without Project scenario, the incremental cancer risk for a child resident is estimated to be *6*~~3~~ in one million; the incremental cancer risk for an adult resident is estimated to be *8*~~4~~ in one million.

40. The paragraph under the *2024 Future With Project vs. 2024 Future Without Project Scenario* heading on page 4.2-117 of the Draft EIR is hereby revised as follows:

> Under the 2024 Future With Project scenario compared to the 2024 Future Without Project scenario, the incremental cancer risk for a school child would result in an estimated *2*~~3~~ in one million, which is below the threshold of significance of 10 in one million. An exposure period for school children was assumed to be 12 years. This peak location is shown on **Figure 4.2.2-*11*~~12~~**. The closest existing school with peak cancer risks would be Oak Street Elementary School, as shown on Figure 4.2.2-*11*~~12~~. Incremental cancer risk for children attending school at this location for 12 years is estimated to be 0.*3*~~7~~ in one million, which is less than the threshold of significance of 10 in one million. Since the school is an elementary school that provides instruction for children from kindergarten through sixth grade (i.e., 7 years), actual exposure for the school child would be less than the 12-year exposure scenario that was modeled.

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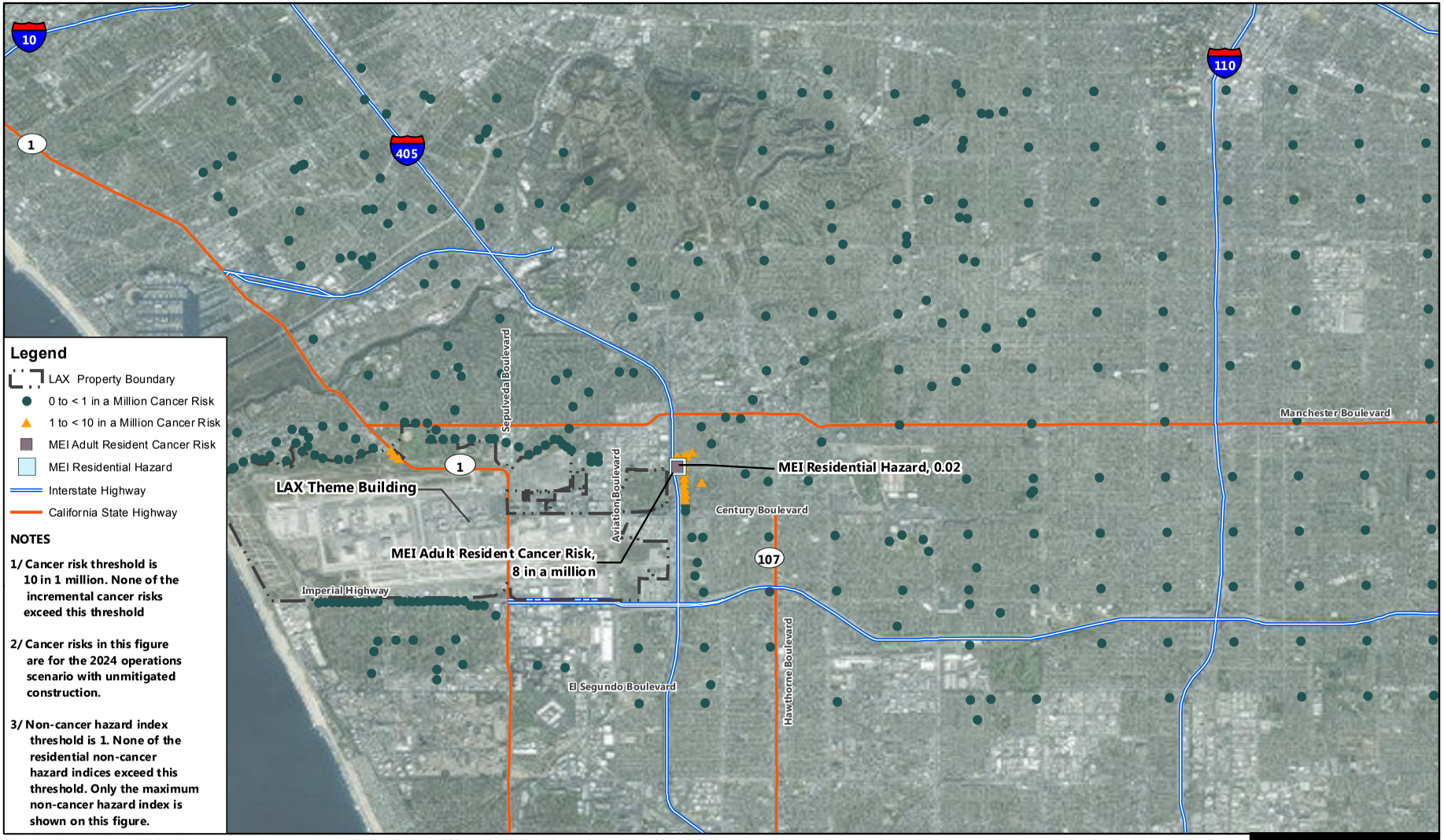


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4.2.2-7**

2024 Future With Project Scenario vs. 2024 Future Without Project Scenario - 30-year Adult Residential Incremental Cancer Risk

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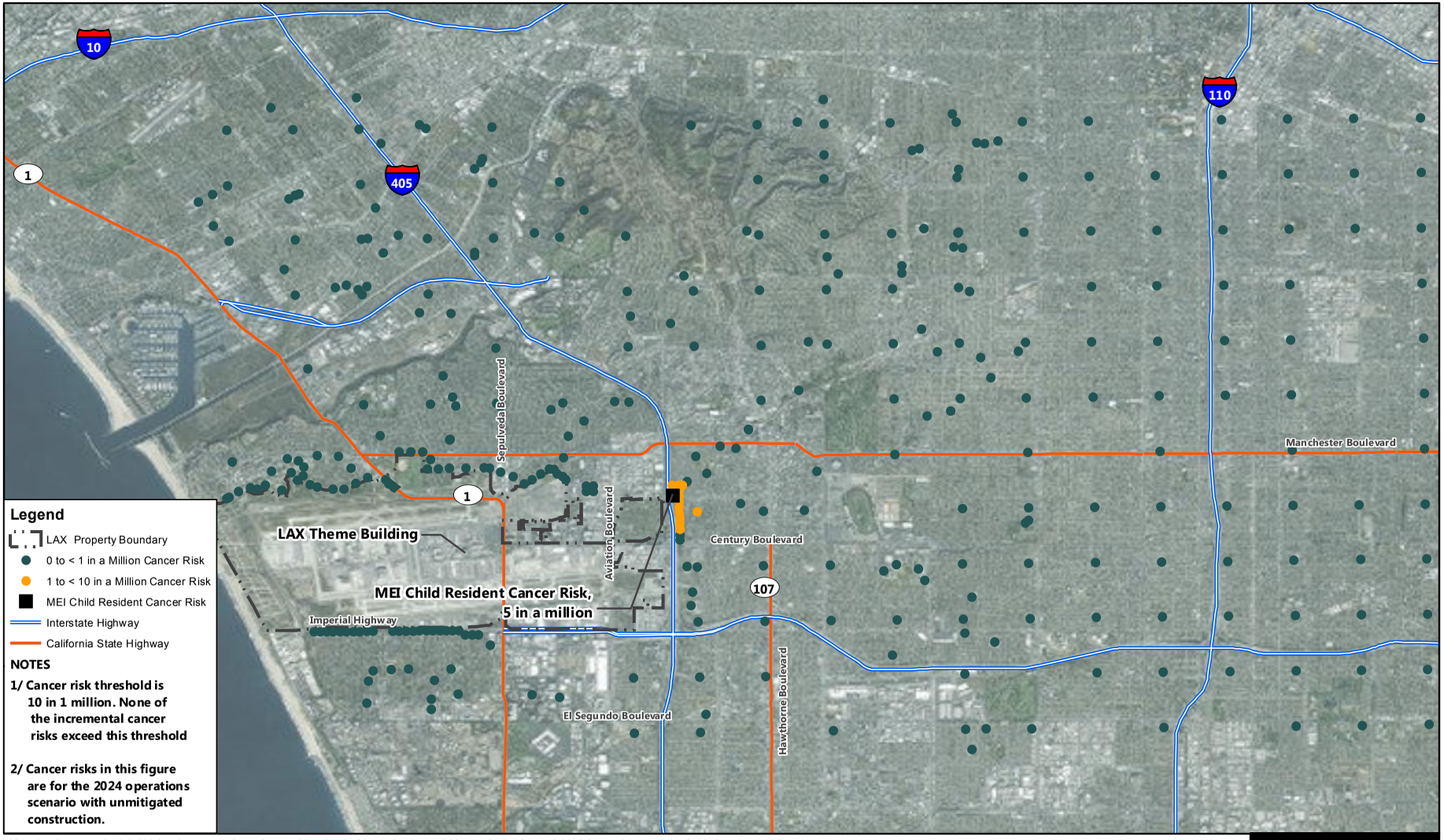


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4.2.2-8**

2024 Future With Project Scenario vs. 2024 Future Without Project Scenario -
9-year Child Residential Incremental Cancer Risk

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41. The first and second sentence of the paragraph under the *2035 Future With Project vs. 2035 Future Without Project Scenario* heading on page 4.2-117 of the Draft EIR are hereby revised as follows:

    Under the 2035 Future With Project compared to the 2035 Future Without Project scenario, the incremental cancer risk for a school child is estimated to be *3*~~1~~ in one million, which is below the threshold of significance of 10 in one million. This peak location is shown on **Figure 4.2.2-1*2*~~3~~**.

42. Figure 4.2.2-10: 2035 Future With Project Scenario vs. 2035 Future Without Project Scenario - 30-year Adult Residential Incremental Cancer Risk on page 4.2-119 of the Draft EIR is hereby renumbered to **Figure 4.2.2-9** and replaced with a corrected figure. Please see the following revised figure.

43. Figure 4.2.2-11: 2035 Future With Project Scenario vs. 2035 Future Without Project Scenario - 9-year Child Residential Incremental Cancer Risk on page 4.2-121 of the Draft EIR is hereby renumbered to **Figure 4.2.2-10** and replaced with a corrected figure. Please see the following revised figure.

44. Figure 4.2.2-12: 2024 Future With Project Scenario vs. 2024 Future Without Project Scenario - 12-year School Child Incremental Cancer Risk on page 4.2-123 of the Draft EIR is hereby renumbered to **Figure 4.2.2-11** and replaced with a corrected figure. Please see the following revised figure.

45. Figure 4.2.2-13: 2035 Future With Project Scenario vs. 2035 Future Without Project Scenario - 12-year School Child Incremental Cancer Risk on page 4.2-125 of the Draft EIR is hereby renumbered to **Figure 4.2.2-12** and replaced with a corrected figure. Please see the following revised figure.

46. The second sentence of the first paragraph under the *2024 Future With Project vs. 2024 Future Without Project Scenario* heading on page 4.2-127 of the Draft EIR is hereby revised as follows:

    This peak location is shown on **Figure 4.2.2-*13*~~14~~**.

47. The first paragraph under the *2035 Future With Project vs. 2035 Future Without Project Scenario* heading on page 4.2-127 of the Draft EIR is hereby revised as follows:

    Under the 2035 Future With Project scenario compared to the 2035 Future Without Project, the incremental cancer risk for an adult worker assuming a 25-year exposure scenario is estimated to be *1*~~0.8~~ in one million, which is below the threshold of significance of 10 in one million. This peak location is shown on **Figure 4.2.2 *14*~~15~~**.

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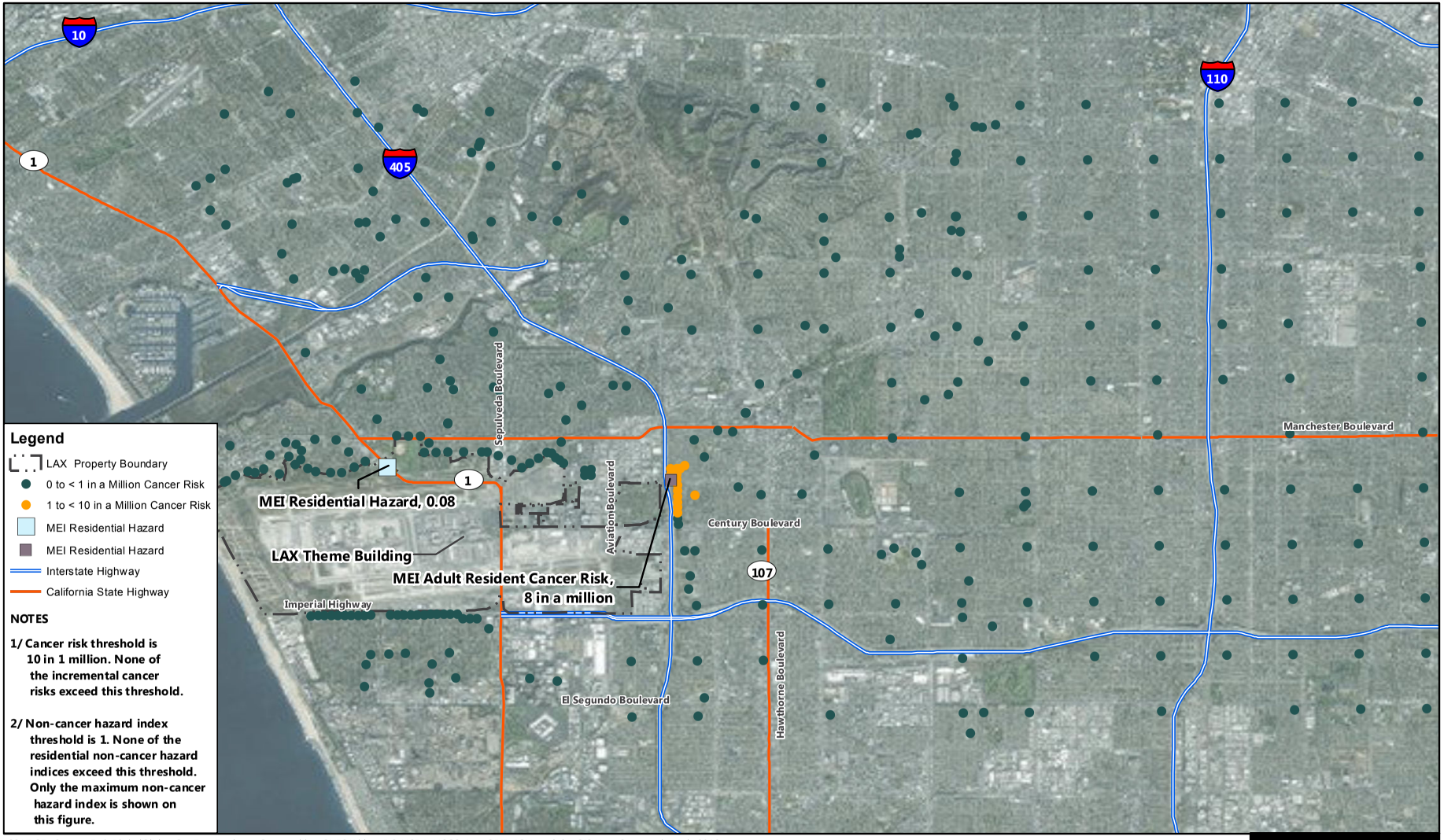


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4.2.2-9**

2035 Future With Project Scenario vs. 2035 Future Without Project Scenario – Refined Scenario - 30-year Adult Residential Incremental Cancer Risk

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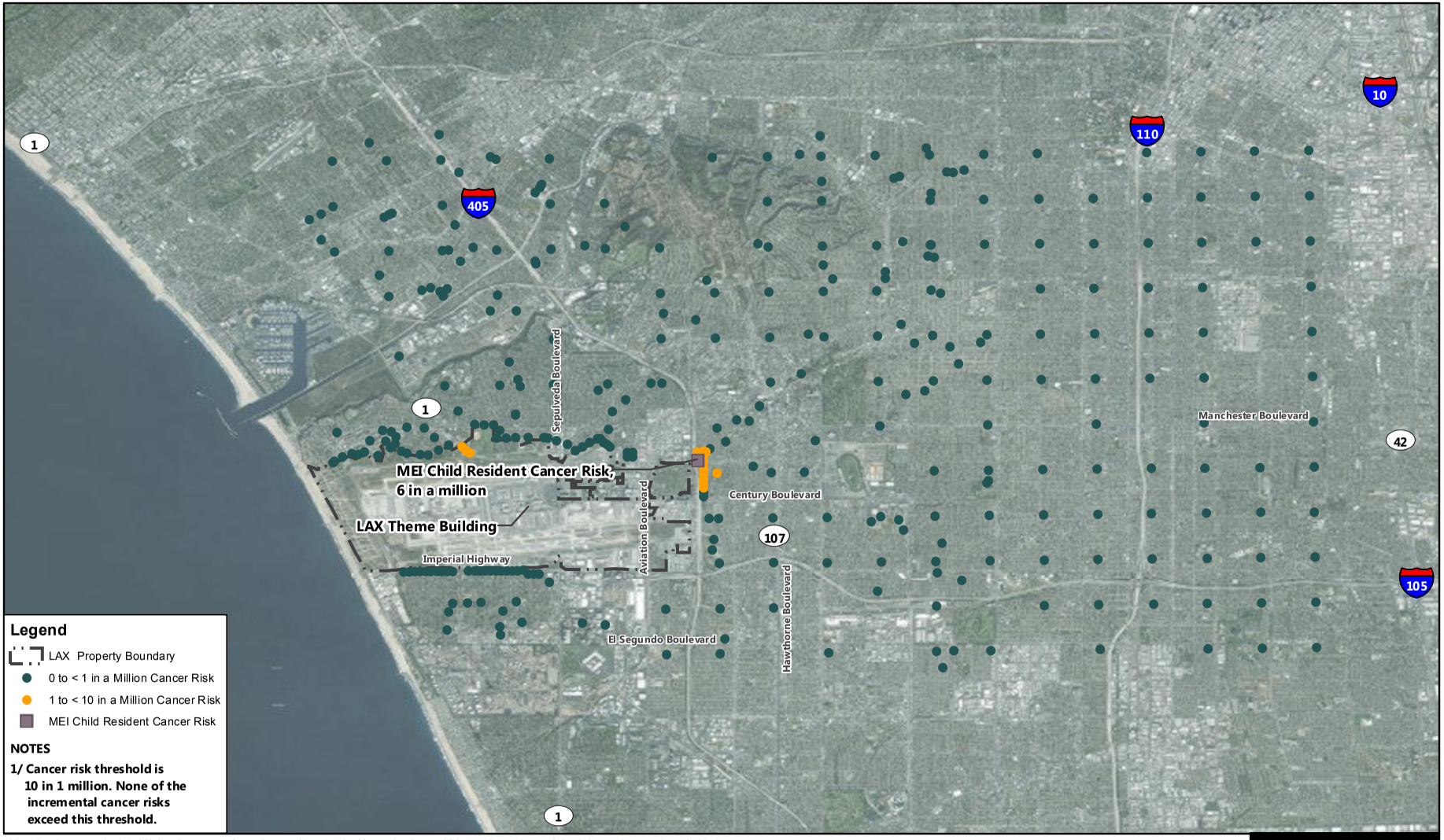


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4.2.2-10**

2035 Future With Project Scenario vs. 2035 Future Without Project Scenario - 9-year Child Residential Incremental Cancer Risk

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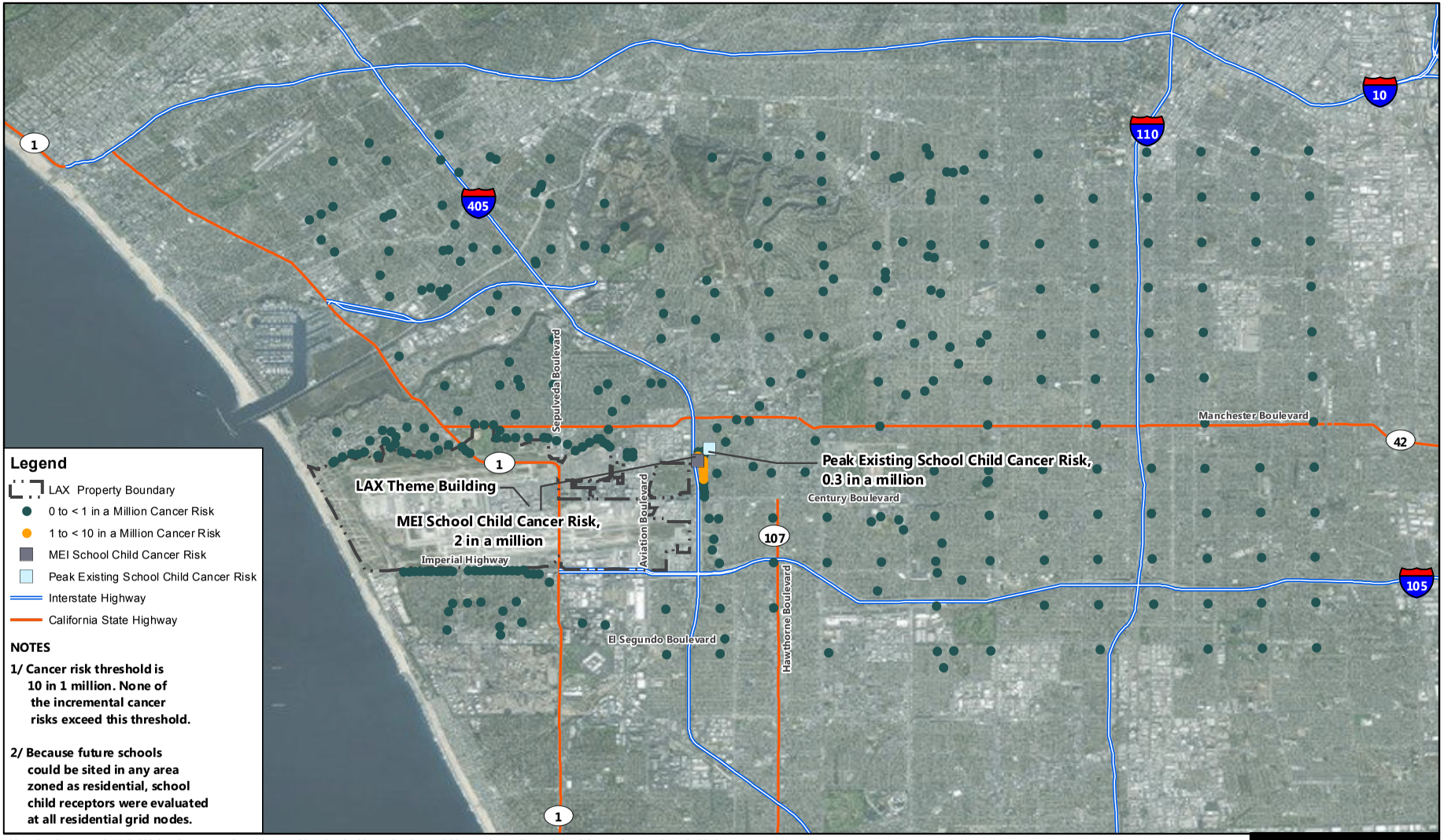


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-11**

2024 Future With Project Scenario vs. 2024 Future Without Project Scenario - 12-year School Child Incremental Cancer Risk

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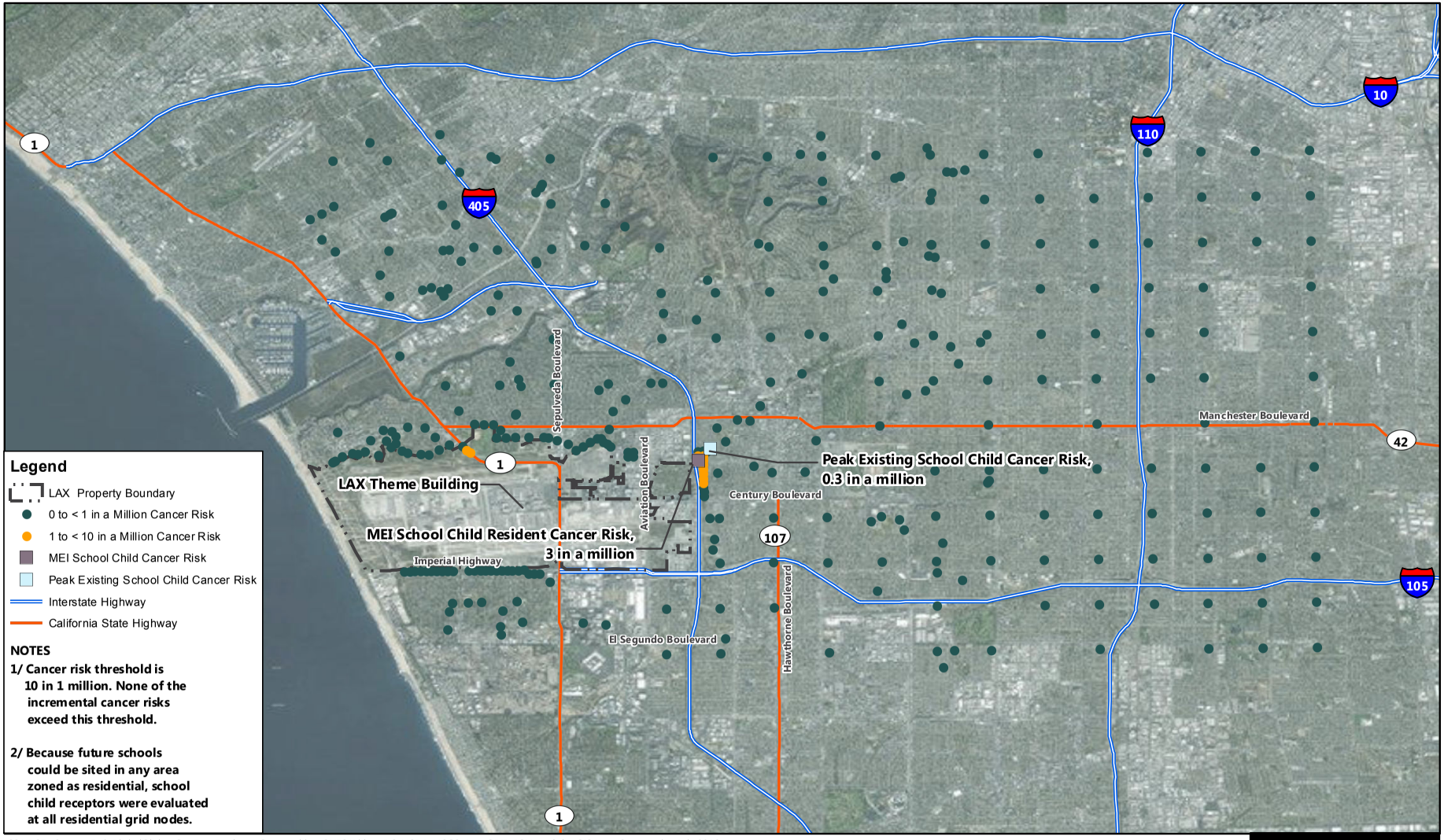


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-12**

2035 Future With Project Scenario vs. 2035 Future Without Project Scenario - 12-year School Child Incremental Cancer Risk

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48. Table 4.2.2-8: Project-Related Non-Cancer Hazard Indices on page 4.2-127 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.2.2-8: *Incremental Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from Project Operation* ~~Project-Related Non-Cancer Hazard Indices~~**

| INCREMENTAL CHRONIC NON-CANCER HUMAN HEALTH HAZARDS FOR MAXIMALLY EXPOSED INDIVIDUALS FROM PROJECT OPERATIONSRECEPTOR TYPE | 2024 FUTURE WITH PROJECT VS. 2024 FUTURE WITHOUT PROJECT1/ | 2035 FUTURE WITH PROJECT VS. 2035 FUTURE WITHOUT PROJECT1/ | SIGNIFICANCE THRESHOLD | EXCEEDS THRESHOLD? |
|---|---|---|---|---|
| Residential | 0.*02*~~6~~ | 0.*08*~~26~~ | 1 | No |
| Commercial | 0.*08*~~26~~ | 0.2*1*~~8~~ | 1 | No |

NOTE:

1/ Hazard indices are unitless.

SOURCE: Appendix F of this EIR (*as revised February 2017)*
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

49. Figure 4.2.2-14: 2024 Future With Project Scenario vs. 2024 Future Without Project Scenario - 25-year Off-Airport Worker Incremental Cancer Risk on page 4.2-129 of the Draft EIR is hereby renumbered to **Figure 4.2.2-13** and replaced with a corrected figure. Please see the following revised figure.

50. Figure 4.2.2-15: 2035 Future With Project Scenario vs. 2035 Future Without Project Scenario - 25-year Off-Airport Worker Incremental Cancer Risk on page 4.2-131 of the Draft EIR is hereby renumbered to **Figure 4.2.2-14** and replaced with a corrected figure. Please see the following revised figure.

51. The first two sentences of the paragraph under the *Resident* *2024 Future With Project vs. 2024 Future Without Project Scenario* heading under *Resident* on page 4.2-133 of the Draft EIR are hereby revised as follows:

> Project-related chronic non-cancer hazard indices for residents are estimated to be 0.*02*~~6~~ under the 2024 Future With Project scenario. This peak location is shown on Figure 4.2.2-*7*~~8~~.

52. The first two sentence of the paragraph under the *Resident* *2035 Future With Project vs. 2035 Future Without Project Scenario* heading under *Resident* on page 4.2-133 of the Draft EIR is hereby revised as follows:

> Project-related chronic non-cancer hazard indices for residents are estimated to be 0.*08*~~26~~ under the 2035 Future With Project scenario. This peak location is shown on Figure 4.2.2-*9*~~10~~.

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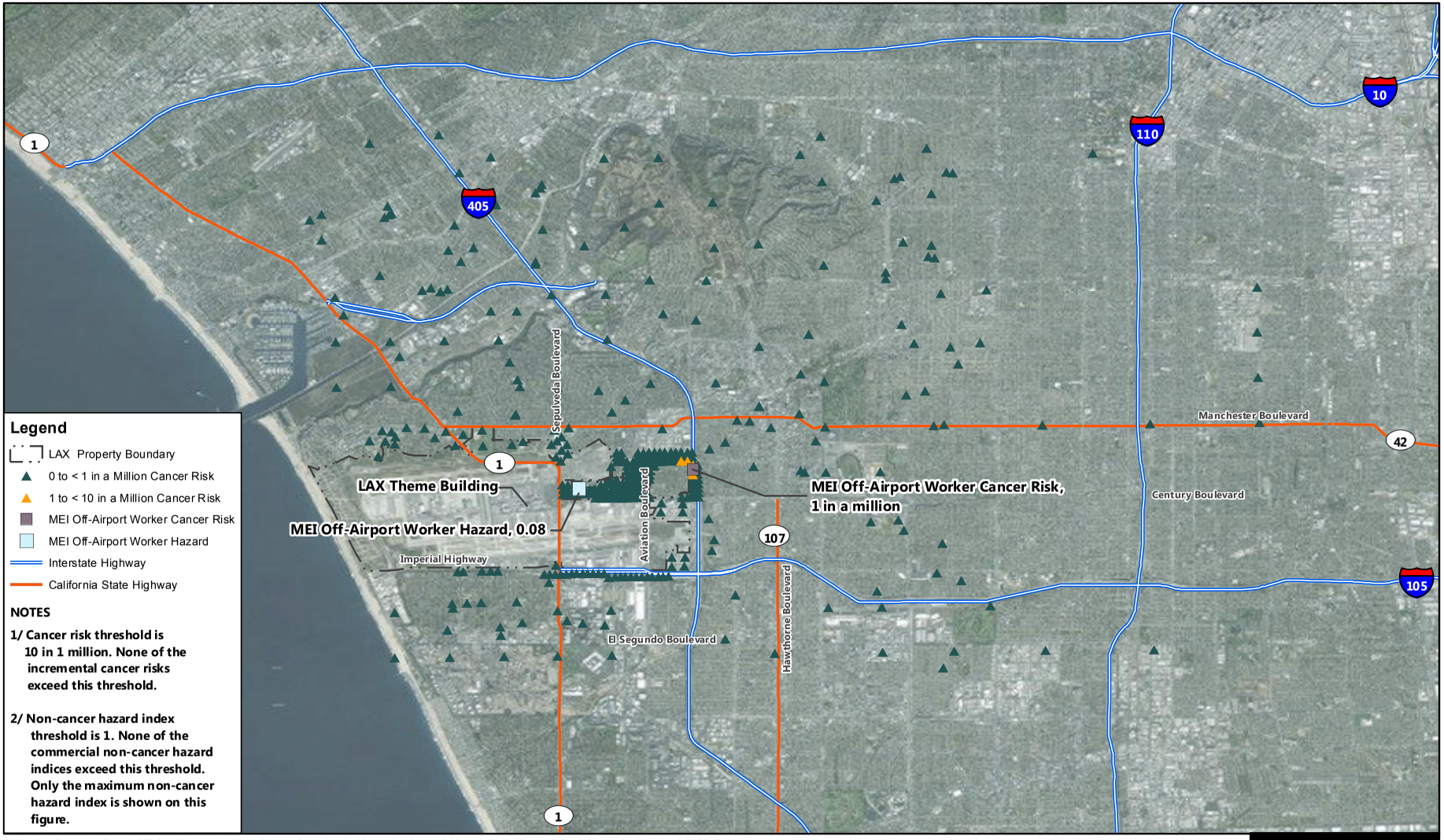


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-13**

2024 Future With Project Scenario vs. 2024 Future Without Project Scenario - 25-year Off-Airport Worker Incremental Cancer Risk

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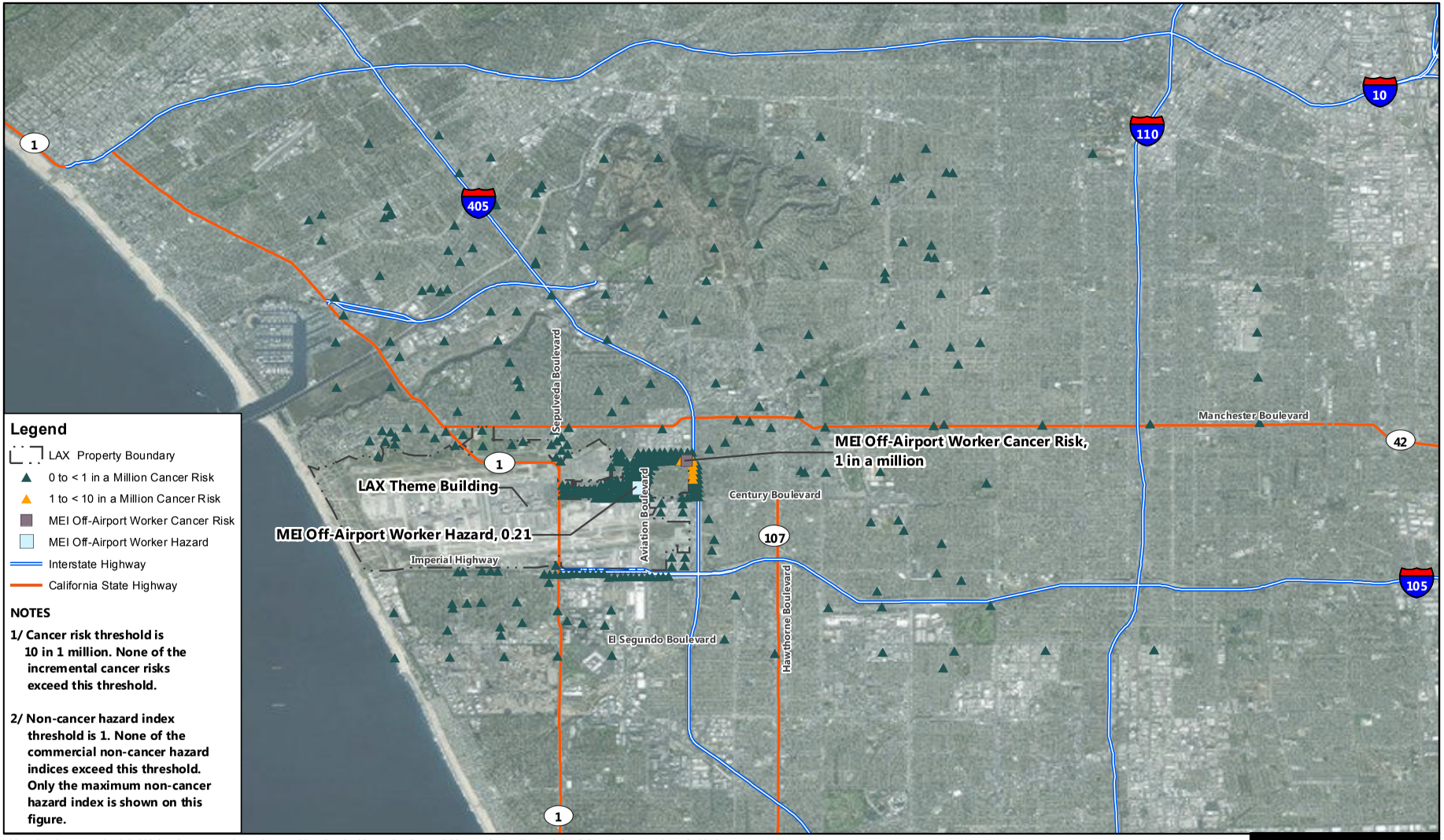


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-14**

2035 Future With Project Scenario vs. 2035 Future Without Project Scenario - 25-year Off-Airport Worker Incremental Cancer Risk

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53. The first two sentences of the paragraph under the *Adult Worker 2024 Future With Project vs. 2024 Future Without Project Scenario* heading under *Adult Worker* on page 4.2-133 of the Draft EIR is hereby revised as follows:

> Project-related chronic non-cancer hazard indices for adult workers are estimated to be 0.*08*~~26~~ under the 2024 Future With Project scenario. This peak location is shown on Figure 4.2.2-*13*~~14~~.

54. The first two sentences of the first paragraph under the *Adult Worker 2035 Future With Project vs. 2035 Future Without Project Scenario* heading under *Adult Worker* on page 4.2-133 of the Draft EIR is hereby revised as follows:

> Project-related chronic non-cancer hazard indices for adult workers are estimated to be 0.2*1*~~8~~ under the 2035 Future With Project scenario. This peak location is shown on Figure 4.2.2-*14*~~15~~.

55. The second paragraph under the Acute Non-Cancer Health Hazards heading on page 4.2-133 of the Draft EIR is hereby revised as follows:

> ~~Acrolein, which is a byproduct of aircraft engine emissions, results are shown here for informational purposes because it has historically been a TAC of concern for acute non-cancer health hazards for other LAX projects.~~

56. Table 4.2.2-9: Operations-Related Acute Non-Cancer Health Hazards on page 4.2-134 of the Draft EIR has been revised. Please see the following revised table.

57. Table 4.2.2-10: Comparison of CalOSHA Permissible Exposure Limits to Maximum Estimated 8-Hour On-Site Air Concentrations for Construction on pages 4.2-135 and 4.2-136 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.2.2-9: Operations-Related Acute Non-Cancer Health Hazards**

| ~~RECEPTOR TYPE~~ | ~~MANGANESE[1/]~~ | | ~~ACROLEIN[1/]~~ | | ~~FORMALDEHYDE[1/]~~ | |
|---|---|---|---|---|---|---|
| | ~~2024 FUTURE WITH PROJECT V. 2024 FUTURE WITHOUT PROJECT~~ | ~~2035 FUTURE WITH PROJECT V. 2035 FUTURE WITHOUT PROJECT~~ | ~~2024 FUTURE WITH PROJECT V. 2024 FUTURE WITHOUT PROJECT~~ | ~~2035 FUTURE WITH PROJECT V. 2035 FUTURE WITHOUT PROJECT~~ | ~~2024 FUTURE WITH PROJECT V. 2024 FUTURE WITHOUT PROJECT~~ | ~~2035 FUTURE WITH PROJECT V. 2035 FUTURE WITHOUT PROJECT~~ |
| ~~On-Site Worker~~ | | | | | | |
| ~~Maximum HI~~ | ~~0.02~~ | ~~0.02~~ | ~~0.0004~~ | ~~0.0002~~ | ~~0.0004~~ | ~~0.0005~~ |
| ~~Average HI~~ | ~~0.01~~ | ~~0.02~~ | ~~0.0003~~ | ~~0.0001~~ | ~~0.00031~~ | ~~0.0003~~ |
| ~~Minimum HI~~ | ~~0.003~~ | ~~0.004~~ | ~~0.00006~~ | ~~0.00003~~ | ~~0.00007~~ | ~~0.00006~~ |
| ~~Off-Site Worker~~ | | | | | | |
| ~~Maximum HI~~ | ~~0.02~~ | ~~0.02~~ | ~~0.0005~~ | ~~0.0003~~ | ~~0.0004~~ | ~~0.0006~~ |
| ~~Average HI~~ | ~~0.003~~ | ~~0.003~~ | ~~0.00006~~ | ~~0.00003~~ | ~~0.00008~~ | ~~0.00007~~ |
| ~~Minimum HI~~ | ~~0.0006~~ | ~~0.0006~~ | ~~0.00001~~ | ~~0.000006~~ | ~~0.00001~~ | ~~0.00001~~ |
| ~~Residential~~ | | | | | | |
| ~~Maximum HI~~ | ~~0.05~~ | ~~0.05~~ | ~~0.0009~~ | ~~0.0005~~ | ~~0.0007~~ | ~~0.0006~~ |
| ~~Average HI~~ | ~~0.003~~ | ~~0.003~~ | ~~0.00006~~ | ~~0.00003~~ | ~~0.00007~~ | ~~0.00006~~ |
| ~~Minimum HI~~ | ~~0.0005~~ | ~~0.0005~~ | ~~0.00001~~ | ~~0.000005~~ | ~~0.00002~~ | ~~0.00001~~ |

| | MANGANESE[1/] | BENZENE[1/] | FORMALDEHYDE[1/] | SIGNIFICANCE THRESHOLD | EXCEEDS THRESHOLD? |
|---|---|---|---|---|---|
| **2024 Future With Project v. 2024 Future Without Project** | | | | | |
| On-Site Worker | 0.0003 to 0.001 | -0.010 to -0.0005 | -0.003 to -0.0002 | 1 | No |
| Off-Site Worker | 0.00005 to 0.03 | -0.03 to 0.02 | -0.009 to 0.007 | 1 | No |
| Residential | 0.00004 to 0.002 | -0.004 to 0.01 | -0.001 to 0.003 | 1 | No |
| **2035 Future With Project v. 2035 Future Without Project** | | | | | |
| On-Site Worker | 0.000005 to 0.0002 | -0.005 to -0.0002 | -0.002 to -0.00007 | 1 | No |
| Off-Site Worker | 0.00000009 to 0.05 | -0.03 to 0.02 | -0.010 to 0.008 | 1 | No |
| Residential | 0.00000009 to 0.02 | -0.004 to 0.01 | -0.001 to 0.003 | 1 | No |

NOTE:

1/ Hazard indices are unitless. *Negative values indicate a beneficial impact when compared to Without Project conditions.*

SOURCE: Appendix F of this EIR (*as revised February 2017*)

PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

## Table 4.2.2-10: Comparison of CalOSHA Permissible Exposure Limits to Maximum Estimated 8-Hour On-Site Air Concentrations for ~~Construction~~*Operations*

| TAC [1/] | CALOSHA PEL TWA (UG/M$^3$) [2/] | 2024 FUTURE WITH PROJECT V. 2024 FUTURE WITHOUT PROJECT[3/] | 2035 FUTURE WITH PROJECT V. 2035 FUTURE WITHOUT PROJECT[3/] |
|---|---|---|---|
| 1,2,4-Trimethylbenzene | 12,5000 | *0.07124* ~~0.00083~~ | *0.08526* ~~0.00052~~ |
| 1,3-Butadiene | 2,200 | *-0.02791* ~~0.00046~~ | *-0.01512* ~~0.00027~~ |
| 2,2,4-Trimethylpentane | N/A | *-0.11830* ~~0.00190~~ | *-0.06408* ~~0.00109~~ |
| Acetaldehyde | 45,000 | *-0.01456* ~~0.00079~~ | *-0.00789* ~~0.00117~~ |
| Acrolein | 250 | *-0.00667* ~~0.00011~~ | *-0.00361* ~~0.00006~~ |
| Benzene | 324 | *-0.12679* ~~0.00217~~ | *-0.06868* ~~0.00141~~ |
| Cumene | 245,000 | *-0.00061* ~~0.00001~~ | *-0.00033* ~~0.00001~~ |
| Cyclohexane | 1,050,000 | *-0.03155* ~~0.00050~~ | *-0.01709* ~~0.00028~~ |
| Ethyl Benzene | 22,000 | *-0.05399* ~~0.00088~~ | *-0.02925* ~~0.00052~~ |
| Ethylene | NA | *-0.32698* ~~0.00629~~ | *-0.17713* ~~0.00494~~ |
| Formaldehyde | 375 | *-0.08129* ~~0.00241~~ | *-0.04403* ~~0.00280~~ |
| Hexane | 180,000 | *-0.08190* ~~0.00131~~ | *-0.04436* ~~0.00075~~ |
| Isoprene, Except From Vegetative Emission Sources | N/A | *-0.00728* ~~0.00012~~ | *-0.00394* ~~0.00006~~ |
| Methanol | 260,000 | *-0.00607* ~~0.00010~~ | *-0.00329* ~~0.00006~~ |
| Methyl Ethyl Ketone {2-Butanone} | 590,000 | *-0.00121* ~~0.00013~~ | *-0.00066* ~~0.00022~~ |
| Naphthalene | 500 | *-0.00243* ~~0.00005~~ | *-0.00131* ~~0.00003~~ |
| Propionaldehyde | N/A | *-0.00182* ~~0.00010~~ | *-0.00099* ~~0.00015~~ |
| Propylene | N/A | *-0.15712* ~~0.00269~~ | *-0.08511* ~~0.00176~~ |
| Styrene | 215,000 | *-0.00607* ~~0.00010~~ | *-0.00329* ~~0.00006~~ |
| Toluene | 37,000 | *-0.29544* ~~0.00481~~ | *-0.16004* ~~0.00283~~ |
| Aluminum | 2,000 | *0.00601* ~~0.03472~~ | *0* ~~0.04110~~ |
| Ammonium | 18,000 | *0.00016* ~~0.00095~~ | *0* ~~0.00112~~ |
| Antimony | 500 | *0.000004* ~~0.00002~~ | *0* ~~0.00003~~ |
| Arsenic | 10 | *0.0000010* ~~0.00001~~ | *0* ~~0.00001~~ |
| Barium | 500 | *0.00139* ~~0.00801~~ | *0* ~~0.00916~~ |
| Bromine | 700 | *0.000002* ~~0.00002~~ | *0.0000007* ~~0.00001~~ |
| Cadmium | 5 | *0.0000002* ~~0.000001~~ | *0* ~~0.000001~~ |
| Chlorine | 1,500 | *0.00021* ~~0.00136~~ | *0.00010* ~~0.00119~~ |
| Chromium | 5 | *0.000002* ~~0.00001~~ | *0.00000003* ~~0.00001~~ |
| Cobalt | 20 | *0.000002* ~~0.00001~~ | *0.0000007* ~~0.00001~~ |
| Copper | 1,000 | *0.00029* ~~0.00169~~ | *0.0000007* ~~0.00192~~ |
| Lead | 50 | *0.000009* ~~0.00005~~ | *0* ~~0.00006~~ |
| Manganese | 200 | *0.00009* ~~0.00051~~ | *0.0000007* ~~0.00059~~ |
| Mercury | 25 | *0.0000005* ~~0.000003~~ | *0* ~~0.000003~~ |
| Nickel | 500 | *0.00002* ~~0.00010~~ | *0.0000007* ~~0.00012~~ |
| Phosphorus | 100 | *0.0002* ~~0.00092~~ | *0* ~~0.00109~~ |
| Selenium | 200 | *0.0000007* ~~0.000004~~ | *0* ~~0.000005~~ |
| Silicon | 5,000 | *0.01872* ~~0.10823~~ | *0* ~~0.12770~~ |
| Silver | 10 | *0* ~~0.00000001~~ | *0* ~~0.00000002~~ |
| Sulfates | NA | *0.00161* ~~0.01042~~ | *0.00061* ~~0.00953~~ |
| Thallium | 100 | *0.0000002* ~~0.000001~~ | *0* ~~0.000002~~ |
| Vanadium (Fume Or Dust) | 50 | *0.00002* ~~0.00012~~ | *0* ~~0.00013~~ |
| Zinc | N/A | *0.00009* ~~0.00053~~ | *0.0000007* ~~0.00061~~ |
| Xylenes | 435,000 | *-0.24691* ~~0.00400~~ | *-0.13375* ~~0.00234~~ |

NOTES:

1/ All TACs for which PEL-TWAs are available are listed. PEL-TWAs are not available for 2,2,4-trimethylpentane, ethylene, isoprene, propionaldehyde, propylene, sulfates, zinc and diesel exhaust.

2/ California Occupational Safety and Health Administration, *Table AC-1, Permissible Exposure Limits for Chemical Contaminants*, 2008, Available: http://www.dir.ca.gov/title8/5155table_ac1.html.

3/ Concentrations are for the Theme Building at grid point ~~855~~*404*. *Negative values indicate a decrease compared to Without Project conditions.*

SOURCE: Appendix F of this EIR (*as revised February 2017)*

PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

58. The paragraph under the *Cancer Risks* heading on page 4.2-137 of the Draft EIR is hereby revised as follows:

> To determine the population-wide risks, Project-related risks for operation impacts were evaluated for the 70-year residential scenario. As shown in **Table 4.2.2-11**, the zone of impact of 1 in a million (10 6) for *both* the ~~for~~ 2024 Future With Project vs. 2024 Future Without Project *and 2035 Future With Project vs. 2035 Future Without Project* would have ~~a~~ cancer burden*s* below the threshold of significance of 0.5. The cancer isopleths and peak locations for 2024 Future With Project vs. 2024 Future Without Project are shown on **Figure 4.2.2-*15*~~16~~**. ~~Since cancer burdens in 2024 are below threshold and total cancer risk for 2035 Future With Project vs. 2035 Future Without Project is less than 2024 Future With Project vs. 2024 Future Without Project, cancer burdens were not calculated for 2035 Future With Project vs. 2035 Future Without Project.~~ The cancer isopleths and peak locations for 2035 Future With Project vs. 2035 Future Without Project are shown on Figure 4.2.2-*16*~~17~~.

59. Table 4.2.2-11: Operation-Related Cancer Burdens on page 4.2-137 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.2.2-11: Operation-Related Cancer Burdens**

| ZONE OF IMPACT | CANCER BURDEN[1/] | THRESHOLD | EXCEEDS THRESHOLD? |
|---|---|---|---|
| *2024 Future With Project vs. 2024 Future Without Project* | | | |
| Within 1 in a million | 0.0*1*~~5~~ | 0.5 | No |
| *2035 Future With Project vs. 2035 Future Without Project* | | | |
| *Within 1 in a million* | *0.01* | *0.5* | *No* |

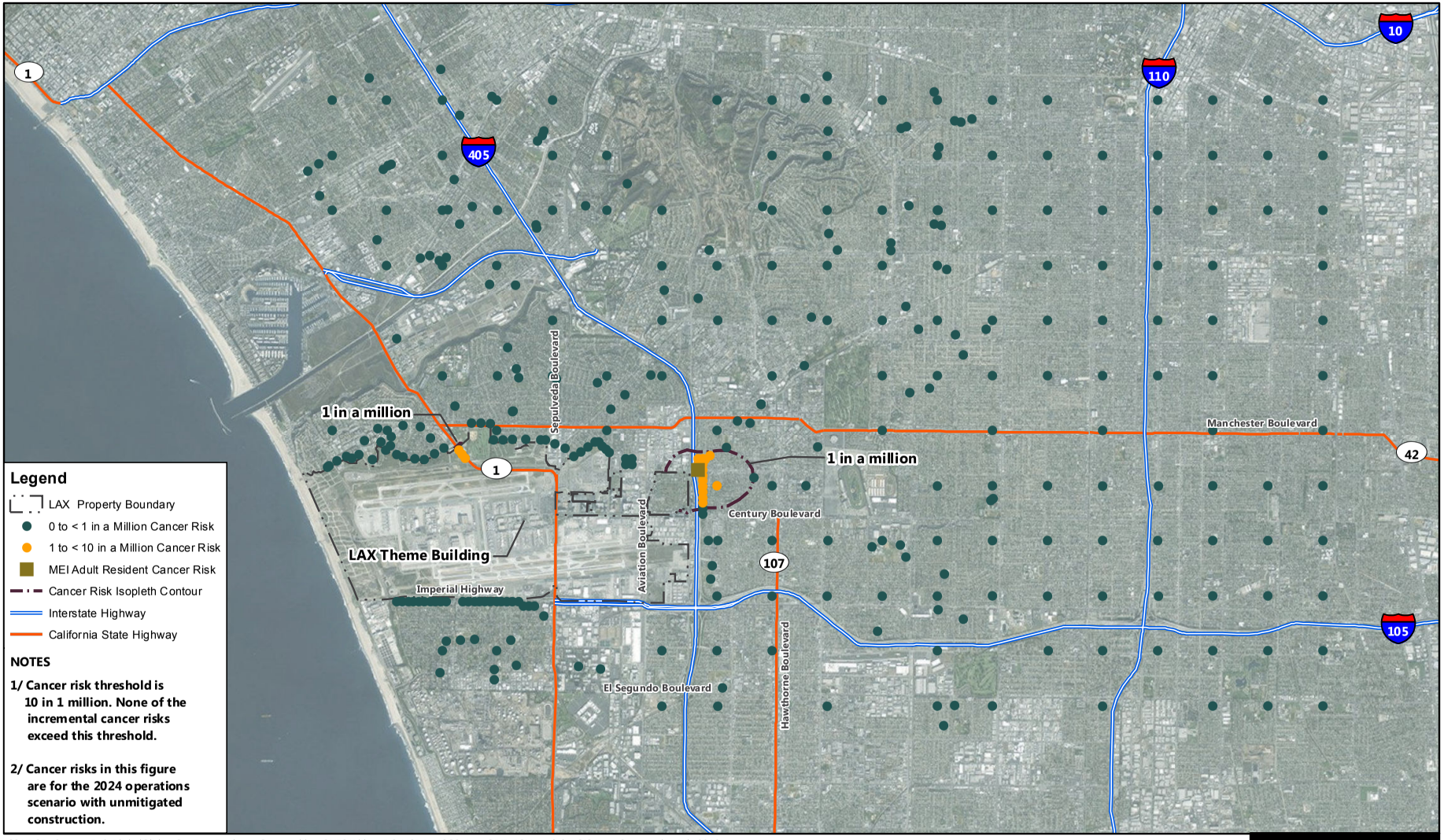
~~NOTE:~~

~~1/ Cancer burdens provided for 2024 Future With Project vs 2024 Future Without Project.~~

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

60. Figure 4.2.2-16: 2024 Future With Project v. 2024 Future Without Project Operations – Cancer Risk on page 4.2-139 of the Draft EIR is hereby renumbered to **Figure 4.2.2-15** and replaced with a corrected figure. Please see the following revised figure.

61. Figure 4.2.2-17: 2035 Future With Project v. 2035 Future Without Project Operations – Cancer Risk on page 4.2-141 of the Draft EIR is hereby renumbered to **Figure 4.2.2-16** and replaced with a corrected figure. Please see the following revised figure.




SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-15**

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Miles

2024 Future With Project v. 2024 Future Without Project Operations -
70-year Adult Residential Incremental Cancer Risk Isopleth

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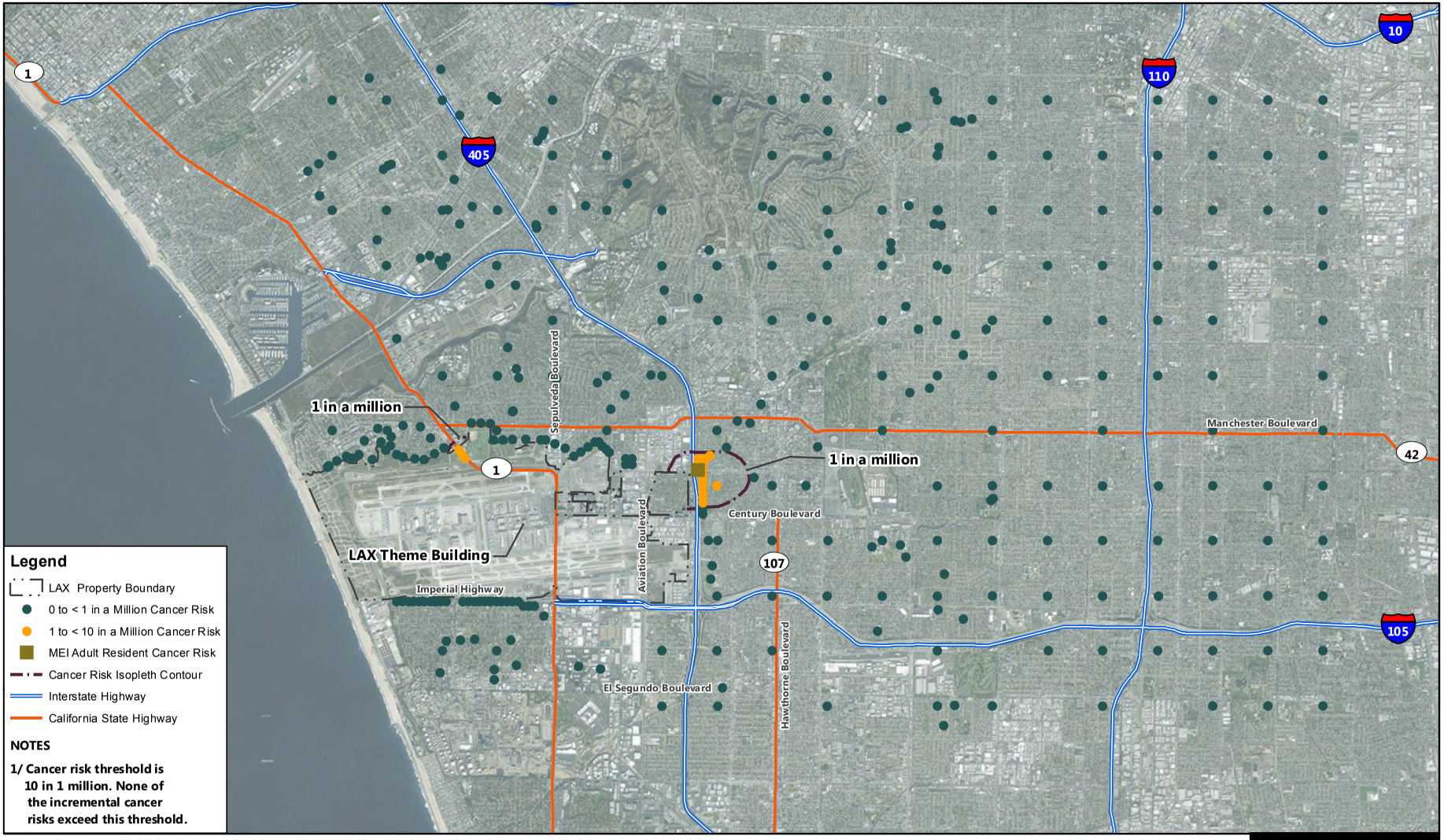


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-16**

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2035 Future With Project v. 2035 Future Without Project Operations -
70-year Adult Residential Incremental Cancer Risk Isopleth

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62. The first bullet under the heading 4.2.2.4.2 Summary of Unmitigated Impacts on page 4.2-143 of the Draft EIR is hereby revised as follows:

    - Incremental cancer risks associated with unmitigated construction of the proposed Project would be above the threshold of significance of 10 in one million for child ~~resident, school child,~~ and adult residents. Incremental cancer risk impacts from construction would be significant.

63. The seventh bullet under the heading 4.2.2.4.2 Summary of Unmitigated Impacts on page 4.2-143 of the Draft EIR is hereby revised as follows:

    - Incremental acute non-cancer hazard indices would be ~~equal to or~~ below the threshold of significance of 1 at all locations of modeled peak TAC concentrations for construction and operation of the proposed Project. Incremental acute non-cancer impacts would be less than significant.

64. The second sentence of the first paragraph under the *Chronic Non-Cancer Hazards* heading on page 4.2-145 of the Draft EIR is hereby revised as follows:

    However, for the proposed Project construction project, chronic non-cancer health hazards are primarily attributable to DPM ~~and,~~ silicon, and barium, and to a lesser extent ~~acrolein and~~ chlorine, *benzene,* aluminum, nickel, cobalt, and manganese.

65. The second sentence of the second paragraph under the *Chronic Non-Cancer Hazards* heading on page 4.2-145 of the Draft EIR is hereby revised as follows:

    Incremental hazard indices for the proposed Project (Table 4.2.2-3) were estimated to range from 0.00*06*~~34~~ to 0.*24*~~5~~ below the threshold of significance of one. Given the relatively small hazard indices associated with proposed Project emissions, the proposed Project is not expected to add significantly to cumulative chronic non-cancer health hazards.

66. The fifth sentence of the first paragraph on page 4.2-146 of the Draft EIR is hereby revised as follows:

    Moreover, USEPA's estimates are based on data from 201*1*~~5~~ and are therefore several years old.

67. The first sentence under the *Acute Non-Cancer Hazards* heading on page 4.2-146 of the Draft EIR is hereby revised as follows:

    Formaldehyde, *benzene,* and manganese are the primary TAC of concern in proposed Project emissions that might be present at concentrations approaching the threshold for acute non-cancer health hazards.

68. The first paragraph on page 4.2-147 of the Draft EIR is hereby revised as follows:

> When USEPA annual average estimates are converted to possible maximum 1-hour average concentrations, acrolein acute non-cancer hazard indices are estimated to range from 0.2 to 1.3, with an average of 0.4; formaldehyde acute non-cancer hazard indices are estimated to range from 0.3 to 0.7, with an average of 0.5; and manganese acute non-cancer hazard indices are estimated to range from 0.03 to 0.1, with an average of 0.06 for locations within the HHRA study area. Predicted overall maximum incremental acute non-cancer health hazards for the proposed Project associated with *benzene*~~acrolein~~ ranged from 0.0000*5*~~06~~ to 0.0~~0~~3; associated with formaldehyde ranged from 0.000*06*~~8~~ to 0.*05*~~2~~; and associated with manganese ranged from 0.00*07*~~3~~ to *0.2*~~1~~. Results suggest that the acute non-cancer health hazards for the proposed Project would not add significantly to total acute non-cancer health hazards for the proposed Project. Therefore, cumulative acute non-cancer health hazards associated with the proposed Project would not be cumulatively considerable.

69. The first paragraph under the heading 4.2.2.6 Mitigation Measures on pages 4.2-147 and 4.2-148 of the Draft EIR is hereby revised as follows:

> Air quality mitigation measures described in Section 4.2.1.7, would be applied to the proposed Project. Although developed to address air quality impacts, these mitigation measures would also reduce health risks associated with exposure to TAC. As noted in Section 4.2.1.7, ~~the mitigation measures identified in Section 4.2.1.7 were modified due to recent experience with a lack of available Tier 4 construction equipment. The analysis for mitigated criteria air pollutant impacts assumed that the off-road construction equipment fleet would be 30 percent USEPA Tier 3 compliant, 35 percent Tier 4 Interim compliant, and 35 percent Tier 4 Final compliant. Fifty percent of the USEPA Tier 3 compliant equipment was also assumed to be fitted with Level 3 VDECS diesel particulate filters. In addition, LAWA is committing to using 90 percent renewable diesel fuel in construction equipment per MM-AQ (LAMP) 1. Applying these mitigation assumptions to the construction health risk impacts resulted substantial reductions in cancer risks; however, the child resident was still estimated to have a cancer risk of approximately 12 per million, above the 10 per million significance threshold. Therefore,~~ LAWA is committ*ed*~~ing~~ to a mitigation program that will result in 40 percent of the off-road construction equipment used on the Project meeting Tier 4 Final standards, 40 percent meeting Tier 4 Interim Standards, and the remaining 20 percent meeting Tier 3 standards – with 50 percent of Tier 3 compliant equipment installed with Level 3 VDECS particulate filters *and using 90 percent renewable diesel fuel in construction equipment per MM-AQ (LAMP)-1.*

70. Table 4.2.2-12: Post-Mitigation Incremental Construction-Related Cancer Risks for Maximally Exposed Individuals With Mitigation on page 4.2-148 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.2.2-12: Post-Mitigation Incremental Construction-Related Cancer Risks for Maximally Exposed Individuals With Mitigation**

| RECEPTOR TYPE | CANCER RISKS (PER MILLION PEOPLE) | THRESHOLD (PER MILLION PEOPLE) | EXCEEDS THRESHOLD? |
|---|---|---|---|
| Adult Resident, 30 years | *5* ~~9~~ | 10 | No |
| Child Resident, 9 years | *6* ~~9~~ | 10 | No |
| School Child, 12 years | *2* ~~4~~ | 10 | No |
| Adult Worker, 25 years | *1* ~~2~~ | 10 | No |

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016, *as revised February 2017*.

71. The first paragraph under the Residents (Adult and Child) heading on page 4.2-148 of the Draft EIR is hereby revised as follows:

> Mitigated incremental cancer risks for an adult resident at Peak location during construction are estimated to be *5*~~9~~ in one million, which is below the threshold of significance of 10 in one million. The mitigated peak cancer risk location for adult residents is shown on **Figure 4.2.2-1*7*~~8~~**.

72. The paragraph under the School Child heading on page 4.2-151 of the Draft EIR is hereby revised as follows:

> Mitigated incremental cancer risks for children attending schools at Peak location within the study area are estimated to be *2*~~4~~ in one million, which is less than the threshold of significance of 10 in one million. The mitigated peak cancer risk location for school children is shown on **Figure 4.2.2-*19*~~20~~**. The incremental cancer risk for children attending the Oak Street Elementary School is estimated to be ~~2~~ *0.6* in one million, which is less than the threshold of significance of 10 in one million.

73. The first paragraph under the Adult Worker heading on page 4.2-151 of the Draft EIR is hereby revised as follows:

> Mitigated cancer risks for adult workers at Peak location are estimated to be *1*~~2~~ in one million. Overall, mitigated Project-related cancer risks for the proposed Project for adult workers would be below the threshold of significance. The mitigated peak cancer risk location for adult workers is shown on **Figure 4.2.2-*20*~~21~~**.

74. Figure 4.2.2-18: Post Mitigation Construction - 30-year Adult Residential Incremental Cancer Risk on page 4.2-149 of the Draft EIR is hereby renumbered to **Figure 4.2.2-17** and replaced with a corrected figure. Please see the following revised figure.

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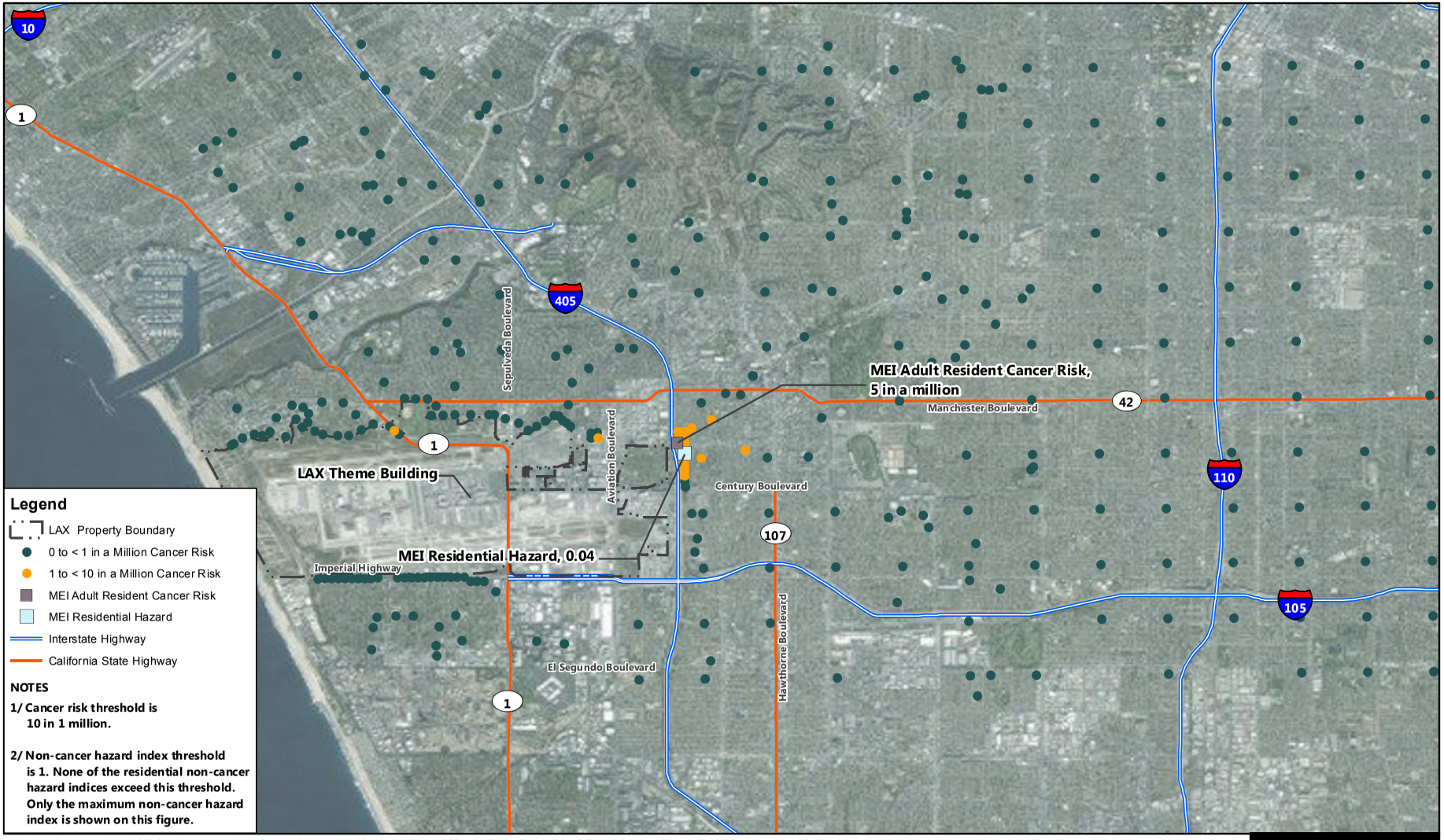


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-17**

## Post-Mitigation Construction - 30-year Adult Residential Incremental Cancer Risk

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75. The first paragraph on page 4.2-151 of the Draft EIR is hereby revised as follows:

> Mitigated incremental cancer risks for a child resident at Peak location during construction are estimated to be *6*~~9~~ in one million, which is below the threshold of significance of 10 in one million. ~~DPM would contribute to the majority of the cancer risk (66 percent) followed by hexavalent chromium, contributing 27 percent. DPM is primarily an emission from diesel construction equipment, haul trucks, and concrete trucks. Hexavalent chromium is primarily an emission from fugitive dust.~~ The mitigated peak cancer risk location for child residents is shown on Figure 4.2.2-*18*~~19~~.

76. Figure 4.2.2-19: Post Mitigation Construction - 9-year Child Residential Incremental Cancer Risk on page 4.2-153 of the Draft EIR is hereby renumbered to **Figure 4.2.2-18** and replaced with a corrected figure. Please see the following revised figure.

77. Figure 4.2.2-20: Post Mitigation Construction - 12-year Child School Incremental Cancer Risk on page 4.2-149 of the Draft EIR is hereby renumbered to **Figure 4.2.2-19** and replaced with a corrected figure. Please see the following revised figure.

78. Figure 4.2.2-21: Post Mitigation Construction - 25-year Off-Airport Worker Incremental Cancer Risk on page 4.2-149 of the Draft EIR is hereby renumbered to **Figure 4.2.2-20** and replaced with a corrected figure. Please see the following revised figure.

## Section 4.4 Cultural Resources

1. Footnote 3 on page 4.4-3 of the Draft EIR is hereby revised as follows:

> [3] U.S. Department of Interior, National Park Service, National Register Bulletin 16, *How to* ~~Guidelines for~~ Complet*e*~~ing~~ *the* National Register Form~~s~~, revised 1997. This bulletin contains technical information on comprehensive planning, survey of cultural resources, and registration in the National Register.

2. The heading on page 4.4-9 of the Draft EIR is hereby revised as follows:

> **California Health and Safety Code *Section* 7050.5**

3. The title of the mitigation measure under the heading 4.4.7.1 Historic Resources on page 4.4-51 of the Draft EIR is hereby revised as follows:

> **~~LAX~~ *MM*-HR (LAMP)-1, Preservation of Historic Resources: Theme Building and Setting Mitigation Measure.**

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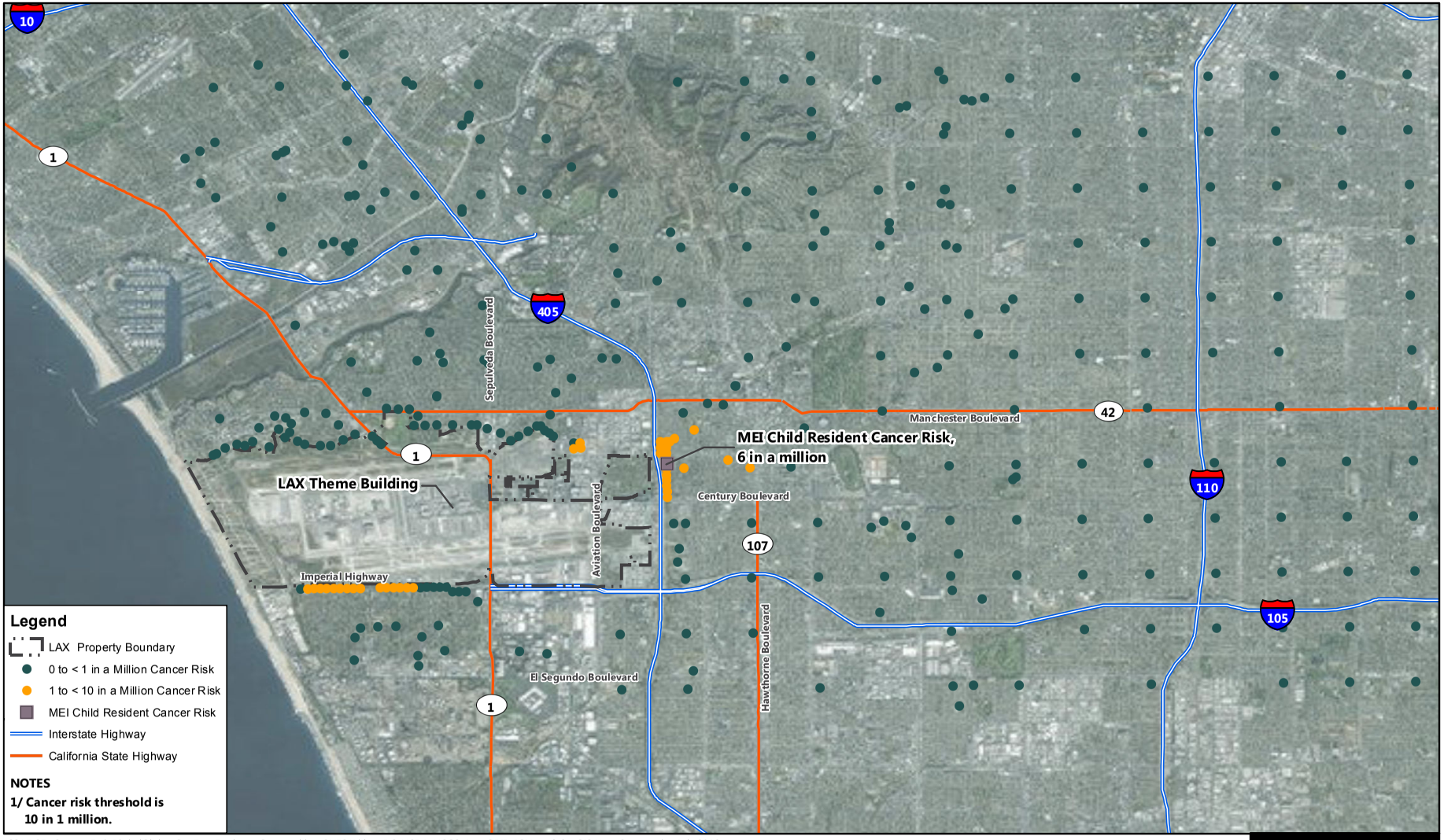


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-18**

Post-Mitigation Construction -
9-year Child Residential Incremental Cancer Risk

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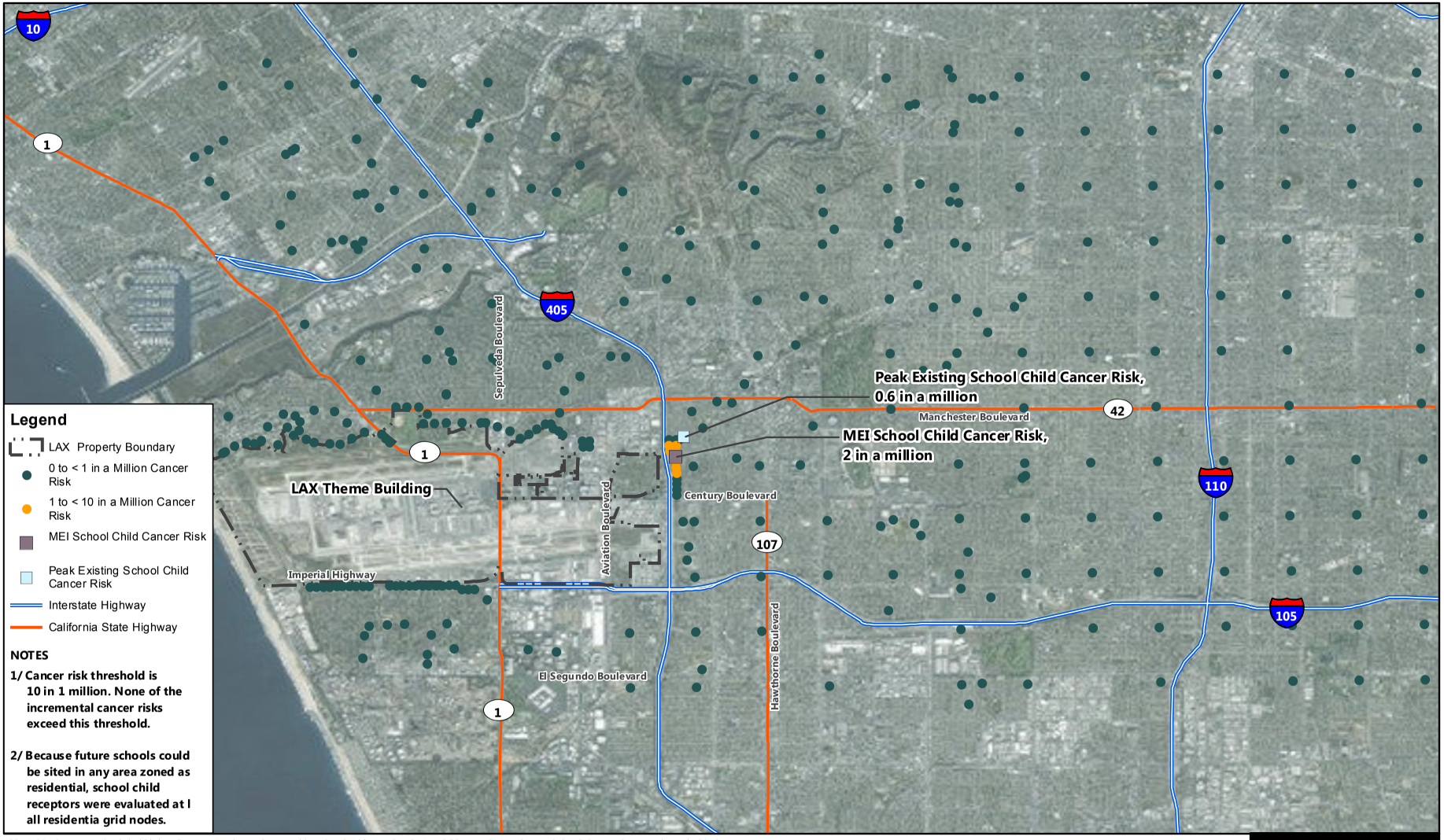


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-19**

Post-Mitigation Construction -
12-year School Child Incremental Cancer Risk

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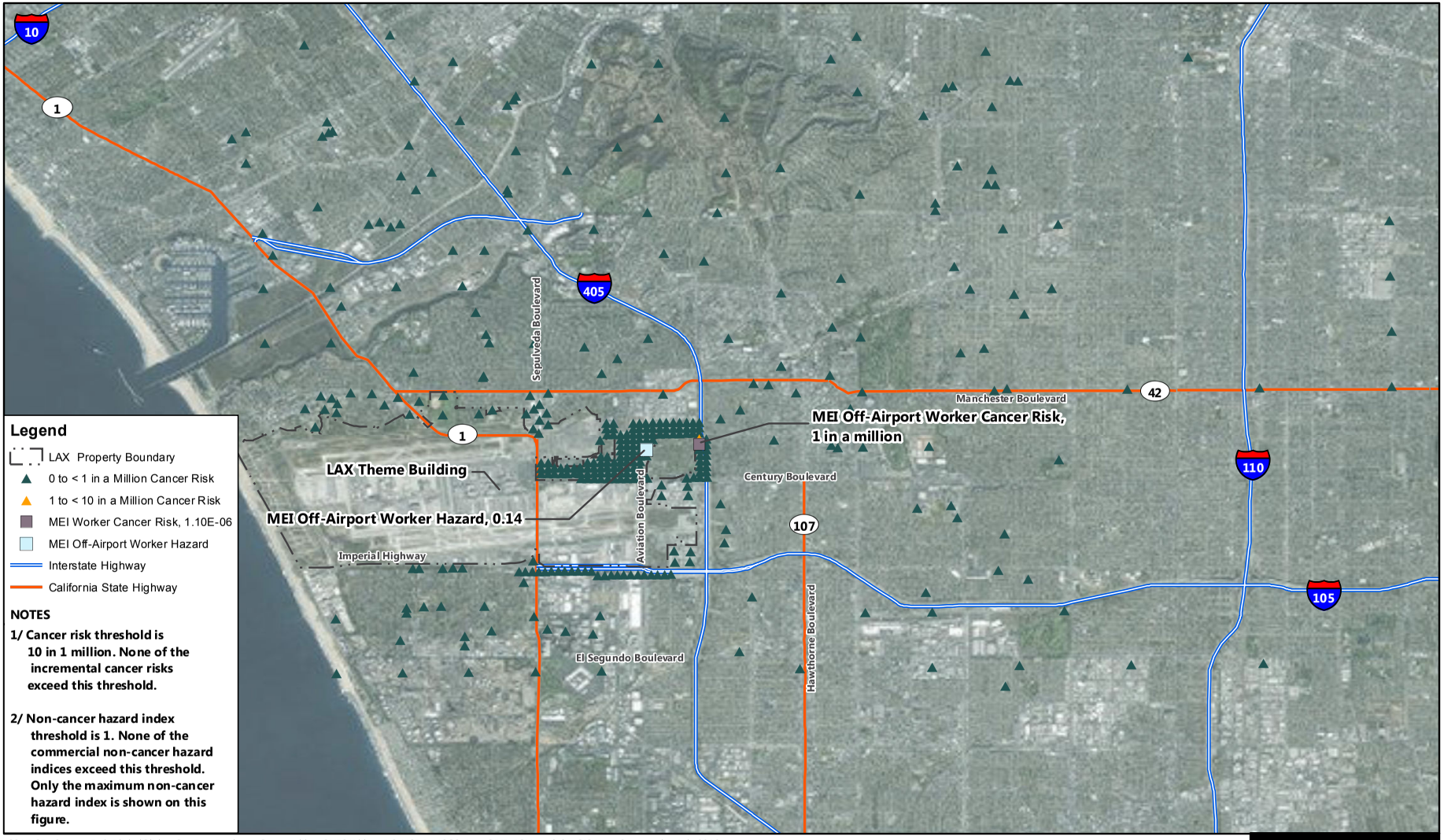


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4.2.2-20**

0 9,000
Feet

## Post-Mitigation Construction - 25-year Off-Airport Worker Incremental Cancer Risk

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4. The last sentence of the first full paragraph on page 4.4-53 of the Draft EIR is hereby revised as follows:

   If human remains are found, LAWA shall comply with the State Health and Safety Code *Section* 7050.5 regarding the appropriate treatment of those remains as outlined in the ATP, which requires notification of the Los Angeles County Coroner's Office, notification of the NAHC and the Most Likely Native American Descendent if the remains are those of a Native American, immediately halting field work or grading in any area reasonably suspected to overlie adjacent human remains, cordoning off the site, and proper treatment and burial.

5. LAX-AR-2 on page 4.4-53 of the Draft EIR is hereby revised as follows:

   - **LAX-AR-2. Archaeological Resources Construction Personnel Briefing.** Prior to initiation of grading activities, LAWA ~~will~~ *shall* require the consulting archaeologist to provide construction personnel with a briefing in the identification of archaeological resources and in the correct procedures for notifying the relevant individuals should such a discovery occur.

6. LAX-PR-1 and LAX PR-2 on page 4.4-54 of the Draft EIR are hereby revised as follows:

   - **LAX-PR-1. Conformance with LAWA's Paleontological Management Treatment Plan (PMTP).** Prior to initiation of grading activities, LAWA ~~will~~ *shall* retain a professional paleontologist, as defined in LAWA's PMTP, who will determine if the proposed site exhibits a high or low potential for subsurface resources. As defined in the PMTP, areas are not subject to paleontological monitoring if they contain re-deposited fill or have previously been disturbed (i.e., areas where project-related excavation extends into re-deposited fill or other previously disturbed soils are considered unlikely to contain/yield notable paleontological resources, and therefore do not warrant monitoring). If the project site is determined to exhibit a high potential for paleontological resources, paleontological monitoring ~~will~~ *shall* be conducted by a professional paleontologist. If the project site is determined to exhibit a low potential for subsurface deposits, excavation need not be monitored as per the PMTP.

   - Monitoring Requirements. In accordance with the PMTP, LAWA ~~will~~ *shall* supply the paleontological monitor (PM) with a construction schedule and any construction, grading, excavation and/or shoring plans prior to the initiation of ground-disturbing activities. LAWA ~~will~~ *shall* also provide the PM access to geotechnical studies completed for the project that contain information indicating subsurface strata types, which can help delineate the areal extent and depth of previously disturbed areas as distinguished from undisturbed areas. Emphasis in identifying construction areas that warrant monitoring ~~will~~ *shall* be placed on the specific portions of the project area identified as exhibiting a high potential for subsurface resources, based on the location of known paleontological localities and/or resources and the identification of areas in which no known disturbances have occurred. The identification of areas to be monitored ~~will~~ *shall* be made by the on-site PM or PM designee in consultation with the appropriate LAWA representative, construction supervisor, and/or geologist, and in accordance with the requirements of the PMTP. Areas of low potential for subsurface paleontological deposits, as

documented by technical sources to be underlain by fill materials, or areas that exhibit a high degree of previous disturbance, based on soil testing ~~will~~ *shall* not be monitored. If excavation activities are scheduled to go below the documented level of fill materials, paleontological monitoring will *shall* be initiated when formational sediments are expected to be reached by earthmoving activities.

- Identification, Evaluation, and Recovery. The PM or PM designee ~~will~~ *shall* identify, evaluate, and recover paleontological resources in accordance with the relevant provisions of the PMTP including, but not limited to, monitoring parameters and specifications, safety issues, paleontological resource collection, fossil preparation and curation procedures, fossil donation protocols, and reporting.

- **LAX-PR-2. Paleontological Resources Construction Personnel Briefing.** Prior to initiation of grading activities, *LAWA shall require* the PM or PM designee ~~will~~ *to* brief construction personnel in the identification of fossils or fossiliferous deposits and in the correct procedures for notifying the relevant individuals should such a discovery occur.

## Section 4.5 Greenhouse Gas Emissions

1. Section 4.5.5.1.1 Construction Emissions on page 4.5-25 of the Draft EIR is hereby revised as follows:

   Annual GHG emissions for construction of the proposed Project are presented in **Table 4.5-4**, which, as indicated in the table, would total *58,541* ~~59,889~~ $MTCO_2e$. As noted in Section 4.5.2.1, construction emissions were amortized over the lifetime of the proposed Project, which is assumed to be 30 years. The total $CO_2e$ amortized over the life of the proposed Project improvements is equal to *1,951* ~~1,997~~ $MTCO_2e$ per year. These amortized construction emissions are added to the operational emissions in 2015, 2024, and 2035, and the final results compared to the No Net Increase emissions threshold for transportation-related projects.

2. Table 4.5-4: Construction Greenhouse Gas Emissions for the Proposed Project without Mitigation on page 4.5-26 of the Draft EIR has been revised. Please see the following revised table.

3. Table 4.5-5: Emissions – 2015 With Project Compared to 2015 Existing Conditions on page 4.5-27 of the Draft EIR has been revised. Please see the following revised table.

4. Table 4.5-6: Emissions – 2024 Future With Project Compared to 2024 Future Without Project on page 4.5-28 of the Draft EIR has been revised. Please see the following revised table.

5. Table 4.5-7: Emissions – 2024 Future With Project Compared to 2015 Existing Conditions on page 4.5-29 of the Draft EIR has been revised. Please see the following revised table.

6. Table 4.5-8: Emissions – 2035 Future With Project Compared to 2035 Future Without Project on page 4.5-30 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.5-4: Construction Greenhouse Gas Emissions for the Proposed Project without Mitigation**

| | CONSTRUCTION GHG EMISSIONS, MT $CO_2e$/YEAR | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | CONSTRUCTION YEAR | | | | | | | | | | | | | | |
| **EMISSION SOURCE** | **2017** | **2018** | **2019** | **2020** | **2021** | **2022** | **2023** | **2024** | **2025** | **2026** | **2027** | **2028** | **2029** | **2030** | **TOTAL** |
| Off-Road, On-Site Equipment | 204 | 3,783 | 7,123 | 6,436 | 3,719 | 2,059 | 1,891 | 564 | 137 | 18 | 143 | 0 | 0 | 0 | 26,077 |
| On-Road, On-Site Trucks | 34 | 1,787 | 3,794 | 4,322 | 2,515 | 1,198 | 503 | 156 | 20 | 12 | 44 | 0 | 0 | 0 | 14,384 |
| On-Road, Off-Site Workers | 22 | 2,322 | 2,983 | 2,260 | 2,052 | 970 | 999 | 410 | 7 | 5 | 20 | 0 | 0 | 0 | 12,052 |
| On-Road, Off-Site Deliveries | *11* ~~9~~ | *373* ~~466~~ | *1,079* ~~1,361~~ | *1,564* ~~1,928~~ | *1,136* ~~1,359~~ | *986* ~~1,144~~ | *538* ~~715~~ | *263* ~~326~~ | 0 | *8* ~~6~~ | *74* ~~61~~ | 0 | 0 | 0 | *6,028* ~~7,376~~ |
| **All Sources (Metric Tons):** | *272* ~~270~~ | *8,265* ~~8,358~~ | *14,979* ~~15,260~~ | *14,578* ~~14,946~~ | *9,422* ~~9,645~~ | *5,213* ~~5,371~~ | *3,931* ~~4,108~~ | *1,393* ~~1,456~~ | 164 | *43* ~~41~~ | *282* ~~269~~ | 0 | 0 | 0 | ***58,541*** ~~**59,889**~~ |

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016, *as revised February 2017*.

**Table 4.5-5: Emissions - 2015 With Project Compared to 2015 Existing Conditions**

| EMISSION SOURCE | 2015 BASELINE (METRIC TONS $CO_2e$) | 2015 WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos [1/] | 2,511,630 | 2,501,574 | -10,055 |
| Trucks [1/] | 531,631 | 519,234 | -12,397 |
| Parking | 23,500 | 22,727 | -773 |
| Proposed Project Construction (Amortized) | -- | *1,951* ~~1,997~~ | *1,951* ~~1,997~~ |
| Other Project Emissions | 27,488 [2/] | 48,925 [3/] | 21,437 |
| **Total Net** | **3,094,249** | ***3,094,411*** ~~**3,094,457**~~ | ***163*** ~~**209**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **Yes** |

NOTES:

1/ Auto and truck GHG emissions for the 2015 With Project scenario are based on total traffic volumes on the roadway network, not just airport-related trip volumes, because airport-related trip volumes for this scenario were not available. The 2015 existing conditions traffic volumes in this table are also based on total volumes, not just airport-related trips, to provide an appropriate comparison to the 2015 With Project scenario.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the electrical demand power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)

PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

**Table 4.5-6: Emissions - 2024 Future With Project Compared to 2024 Future Without Project**

| EMISSION SOURCE | 2024 FUTURE WITHOUT PROJECT (METRIC TONS $CO_2e$) | 2024 FUTURE WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 364,405 | 335,624 | -28,781 |
| Trucks | 37,086 | 37,234 | 147 |
| Parking | 23,167 | 22,477 | -690 |
| Proposed Project Construction (Amortized) | -- | *1,951* ~~1,997~~ | *1,951* ~~1,997~~ |
| Project Energy Demand [1/] | 18,487 [2/] | 33,450 [3/] | 14,963 |
| **Total Net** | **443,145** | ***430,736*** ~~**430,782**~~ | ***-12,410*** ~~**-12,364**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **No** |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)

PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

**Table 4.5-7: Emissions - 2024 Future With Project Compared to 2015 Existing Conditions**

| EMISSION SOURCE | 2015 EXISTING CONDITIONS (METRIC TONS $CO_2e$) | 2024 FUTURE WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 330,236 | 335,624 | 5,388 |
| Trucks | 47,722 | 37,234 | -10,488 |
| Parking | 23,500 | 22,477 | -1,023 |
| Proposed Project Construction (Amortized) | -- | *1,951* ~~1,997~~ | *1,951* ~~1,997~~ |
| Project Energy Demand [1/] | 27,488 [2/] | 33,450 [3/] | 5,962 |
| **Total Net** | **428,946** | ***430,736*** ~~**430,782**~~ | ***1,790*** ~~**1,836**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **Yes** |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

**Table 4.5-8: Emissions - 2035 Future With Project Compared to 2035 Future Without Project**

| EMISSION SOURCE | 2035 FUTURE WITHOUT PROJECT (METRIC TONS $CO_2e$) | 2035 FUTURE WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 316,229 | 266,687 | -49,542 |
| Trucks | 46,060 | 49,209 | 3,149 |
| Parking | 21,111 | 20,667 | -444 |
| Proposed Project Construction (Amortized) | -- | *1,951* ~~1,997~~ | *1,951* ~~1,997~~ |
| Project Energy Demand [1/] | 12,254 [2/] | 22,734 [3/] | 10,480 |
| **Total Net** | **395,654** | ***361,248*** ~~**361,294**~~ | ***-34,406*** ~~**-34,360**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **No** |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

7. Table 4.5-9: Emissions – 2035 Future With Project Compared to 2015 Existing Conditions on page 4.5-31 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.5-9: Emissions - 2035 Future With Project Compared to 2015 Existing Conditions**

| EMISSION SOURCE | 2015 EXISTING CONDITIONS (METRIC TONS $CO_2e$) | 2035 FUTURE WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 330,236 | 266,687 | -63,549 |
| Trucks | 47,722 | 49,209 | 1,487 |
| Parking | 23,500 | 20,667 | -2,833 |
| Proposed Project Construction (Amortized) | -- | *1,951* ~~1,997~~ | *1,951* ~~1,997~~ |
| Project Energy Demand [1/] | 27,488 [2/] | 22,734 [3/] | -4,754 |
| **Total Net** | **428,946** | ***361,248*** ~~**361,294**~~ | ***-67,655*** ~~**-67,652**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **No** |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

8. The paragraph under the heading **Green LA** on page 4.5-34 of the Draft EIR is hereby revised as follows:

> As described in Section 4.5.3.1.4, Green LA presents a framework targeted to reduce the City's GHG emissions by 35 percent below 1990 levels by 2030, and identifies objectives and actions in various focus areas, including airports. While none of those objectives and actions are specific to the proposed Project, the essence of the proposed Project, to reduce traffic congestion around the airport, reduce VMT, and reduce GHG emissions, is consistent with, and complementary to, the basic purpose of the Green LA plan. Notwithstanding, the GHG emissions associated with operations of the proposed Project in the future would exceed the City's climate change goal reflected in Green LA; that goal being to reduce the city's GHG emissions 35 percent below 1990 levels by 2030 – see discussion above relative to AB 32 for additional explanation. *More specifically, as indicated in the top paragraph on page 4.5-33, of the Draft EIR, "…the Project-related GHG emissions in 2024 would be approximately 43 percent greater than the comparable emissions in 1990 and the Project-related GHG emissions in 2035 would be approximately 48 percent greater*

*than the 1990 GHG emissions." As such, the Project's GHG emissions in 2024 would already be 78 percent above the 2030 GHG reduction target of 35 percent below 1990 levels, and the Project's GHG emissions in 2035 would be 83 percent above the 2030 GHG reduction target. Relative to the Project's GHG emissions in 2030, as the basis of a direct comparison to the 2030 GHG reduction target, the percent above 1990 GHG emissions levels that would occur within the 11 years between 2024 and 2035 would average approximately 0.45 percent per year (i.e., the 48 percent exceedance projected for 2035 minus the 43 percent projected for 2024 equals a difference of 5 percent, which divided by the 11 years between 2024 and 2035 equals 0.45 percent per year), which multiplied by six years between 2024 and 2030, would equate to 2.7 percent. As such, the Project's GHG emissions in 2030 would be approximately 45.7 percent above the 1990 GHG emissions (i.e., 43 percent in 2024 + 2.7 percent over six additional years to 2030), which is 80.7 percent above the 2030 GHG reduction target*. The proposed Project's numerical exceedances of the GHG reduction target reflected in Green LA is considered, for the purposes of this EIR, to be inconsistent with the City's ability to achieve the 2030 target in the subject plan and is therefore a significant impact.

9. The second paragraph under the heading **LAWA Sustainability Plan** on page 4.5-35 of the Draft EIR is hereby revised as follows:

In summary, implementation of the proposed Project would not conflict with the overall intent of the LAWA Sustainability Plan; however, the GHG emission level associated with future operation (2024 and 2035) of the proposed Project do not conform to Objective Target 5A (i.e., reduce GHG emissions to 35 percent below 1990 levels by 2030). *More specifically, as indicated in the top paragraph on page 4.5-33, of the Draft EIR, "…the Project-related GHG emissions in 2024 would be approximately 43 percent greater than the comparable emissions in 1990 and the Project-related GHG emissions in 2035 would be approximately 48 percent greater than the 1990 GHG emissions." As such, the Project's GHG emissions in 2024 would already be 78 percent above the 2030 GHG reduction target of 35 percent below 1990 levels, and the Project's GHG emissions in 2035 would be 83 percent above the 2030 GHG reduction target. Relative to the Project's GHG emissions in 2030, as the basis of a direct comparison to the 2030 GHG reduction target, the percent above 1990 GHG emissions levels that would occur within the 11 years between 2024 and 2035 would average approximately 0.45 percent per year (i.e., the 48 percent exceedance projected for 2035 minus the 43 percent projected for 2024 equals a difference of 5 percent, which divided by the 11 years between 2024 and 2035 equals 0.45 percent per year), which multiplied by six years between 2024 and 2030, would equate to 2.7 percent. As such, the Project's GHG emissions in 2030 would be approximately 45.7 percent above the 1990 GHG emissions (i.e., 43 percent in 2024 + 2.7 percent over six additional years to 2030), which is 80.7 percent above the 2030 GHG reduction target*. Notwithstanding that such future GHG emissions levels are due to future passenger activity levels at LAX that are beyond the scope of the proposed Project and that such future GHG emissions would be greater without implementation of the proposed Project, the numerical inconsistency with the target GHG reduction level is considered, for the purposes of this EIR, to be inconsistent with LAWA's ability to achieve the 2030 target in the subject plan and is therefore a significant impact.

10. Table 4.5-11: Emissions – 2035 Future With Project and Potential Future Related Development Compared to 2035 Future Without Project on page 4.5-39 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.5-11: Emissions - 2035 Future With Project and Potential Future Related Development Compared to 2035 Future Without Project**

| EMISSION SOURCE | 2035 FUTURE WITHOUT PROJECT (METRIC TONS $CO_2e$) | 2035 FUTURE WITH PROJECT AND POTENTIAL FUTURE RELATED DEVELOPMENT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 316,229 | 266,687 | -49,542 |
| Trucks | 46,060 | 49,209 | 3,149 |
| Parking | 21,111 | 20,667 | -444 |
| Proposed Project Construction (Amortized) | -- | *1,951* ~~1,997~~ | *1,951* ~~1,997~~ |
| Potential Future Development Construction (Amortized) | -- | 561 | 561 |
| Project Energy Demand [1/] | 12,254 [2/] | 22,734 [3/] | 10,480 |
| Future Related-Development | -- | 19,762 | 19,762 |
| **Total Net** | **395,654** | ***381,571*** ~~**381,617**~~ | ***-14,083*** ~~**-14,307**~~ |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

11. Table 4.5-12: Emissions – 2035 Future With Project and Potential Future Related Development Compared to 2015 Existing Conditions on page 4.5-39 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.5-12: Emissions - 2035 Future With Project and Potential Future Related Development Compared to 2015 Existing Conditions**

| EMISSION SOURCE | 2015 EXISTING CONDITIONS (METRIC TONS $CO_2e$) | 2035 FUTURE WITH PROJECT AND POTENTIAL FUTURE RELATED DEVELOPMENT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 330,236 | 266,687 | -63,549 |
| Trucks | 47,722 | 49,209 | 1,487 |
| Parking | 23,500 | 20,667 | -2,833 |
| Proposed Project Construction (Amortized) | -- | *1,951* ~~1,997~~ | *1,951* ~~1,997~~ |
| Potential Future Development Construction (Amortized) | -- | 561 | 561 |
| Project Energy Demand [1/] | 27,488 | 22,734 [3/] | -4,754 |
| Future Related-Development | -- | 19,762 | 19,762 |
| **Total Net** | **428,946** | ***381,571*** ~~**381,617**~~ | ***-47,375*** ~~**-47,329**~~ |

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

12. Mitigation Measure Number 1b of LAX-AQ-1 included in Table 4.5-13: Construction-Related Air Quality Control Measures on page 4.5-43 of the Draft EIR is hereby revised as follows:

> ~~Prior to final occupancy~~*During construction*, the contractor shall demonstrate that all ground surfaces are covered or treated sufficiently to minimize fugitive dust emissions.

13. Mitigation Measure Number 1e of LAX-AQ-1 included in Table 4.5-13: Construction-Related Air Quality Control Measures on page 4.5-43 of the Draft EIR is hereby revised as follows:

> All diesel-fueled equipment used for construction will be outfitted with the best available emission control devices, where technologically feasible, primarily to reduce emissions of diesel particulate matter (PM), including fine PM (PM2.5), and secondarily, to reduce emissions of NOx. This requirement shall apply to diesel-fueled off-road equipment (such as construction machinery), diesel-fueled on-road vehicles (such as trucks), and stationary diesel-fueled engines (such as electric generators). (It is unlikely that this measure will apply to equipment with Tier 4 engines*, as these engines typically already incorporate the best available emission control devices*.) The emission control devices utilized in construction equipment shall be verified or certified by California Air Resources Board or US Environmental Protection Agency for use in on-road or off-road vehicles or engines. For multi-year construction projects, a reassessment *of equipment availability, equipment fleet mixtures, and best available emissions control devices* shall be conducted annually *for equipment newly brought to the project site each year*~~to determine what constitutes a best available emissions control device~~.

14. Mitigation Measure Number 1g of LAX-AQ-1 included in Table 4.5-13: Construction-Related Air Quality Control Measures on page 4.5-43 of the Draft EIR is hereby revised as follows:

    To the extent feasible, have construction employees ~~work/~~commute during off-peak hours.

15. The end of Table 4.5.13 on page 4.5-45 of the Draft EIR is hereby revised as follows:

    ~~NOTES:~~

    ~~NQ = Not Quantified~~

16. Mitigation Measure Number 2a of LAX-AQ-2 included in Table 4.5.14: Transportation-Related Air Quality Control Measures on page 4.5-46 of the Draft EIR is hereby revised as follows:

    Provide ~~free parking and~~ preferential parking locations for ultra-low emission vehicles/super low emission vehicles/zero emission vehicles (ULEV/SULEV/ZEV) in all (including employee) LAX lots; provide free charging stations for ZEV; include public outreach to reduce air emissions from automobiles accessing airport parking.

17. The last paragraph on page 4.5-47 is hereby revised to clarify that the measures identified in Table 4.5-16 are part of the proposed Project, as follows:

    For operational impacts, the proposed Project would comply with the requirements of the City of Los Angeles Green Building Ordinance and with LAWA policies and programs related to sustainability and reducing GHG emissions that are implemented on a project-specific and on an Airport-wide basis. LAWA has an ongoing commitment to increasing energy efficiency and implementing energy conservation measures to reduce wasteful, inefficient, and unnecessary consumption of energy at its airports. The LAX Design Guidelines include a section on sustainability initiatives to be considered for Airport projects that include energy efficiency and water conservation measures (see Appendix B). LAWA has committed to implementing, if feasible, various sustainability measures for different proposed Project elements that go above and beyond the Tier 1 requirements of the LAGBC, as shown in **Table 4.5-16**. *These measures will be implemented as part of the proposed Project, if feasible.*

18. Mitigation Measure MM-AQ (LAMP)-1 on page 4.5-59 of the Draft EIR is hereby revised as follows:

    - **MM-AQ (LAMP)-1 – Preferential Use of Renewable Diesel Fuel.** LAWA will require the use of renewable diesel fuel in proposed Project construction off-road equipment and on-site, on-road trucks, *for at least 90 percent of diesel fuel demand* ~~to the extent feasible~~. Renewable diesel fuel is available locally *for fleetwide use* and has been shown to reduce criteria pollutant and greenhouse gas emissions from diesel engines.[51, 51a]

      [51] Neste Oil Corporation NEXBTL Renewable Diesel, 2014, Available: https://www.neste.com/sites/default/files/attachments/nexbtl_03032014.pdf, accessed August 23, 2016.

      [51a] *Propel Fuels, 2016, Available: https://propelfuels.com/fleet_and_commercial, accessed August 23, 2016.*

19. Section 4.5.8.1.1 Mitigated Construction Impacts on page 4.5-59 of the Draft EIR is hereby revised as follows:

> Mitigation Measure MM-AQ (LAMP)-1 would require that diesel fueled construction equipment and trucks utilize renewable diesel fuels as a means of reducing greenhouse gas emissions during construction of the proposed Project, which was quantified in the analysis presented below. Although additional mitigation measures for the reduction of GHG emissions were identified as mitigation in Section 4.5.7, for the purposes of this analysis, no further reductions to construction related GHG emissions were quantified. The mitigated construction emissions of GHGs for the entire construction period are summarized in Table 4.5-17, which, as shown, would total *42,208* ~~43,071~~ $MTCO_2e$. The 30-year amortized emissions for construction of Phase 1 and Phase 2 of the proposed Project would be *1,407* ~~1,436~~ MT $CO_2e$ per year.

20. Table 4.5-17: Construction Greenhouse Gas Emissions for the Proposed Project with Mitigation on page 4.5-60 of the Draft EIR has been revised. Please see the following revised table.

21. Table 4.5-18: Mitigated Emissions – 2015 With Project Compared to 2015 Existing Conditions on page 4.5-62 of the Draft EIR has been revised. Please see the following revised table.

22. Table 4.5-19: Mitigated Emissions – 2024 Future With Project Compared to 2024 Future Without Project on page 4.5-63 of the Draft EIR has been revised. Please see the following revised table.

23. Table 4.5-20: Mitigated Emissions – 2024 Future With Project Compared to 2015 Existing Conditions on page 4.5-64 of the Draft EIR has been revised. Please see the following revised table.

24. Table 4.5-21: Mitigated Emissions – 2035 Future With Project Compared to 2035 Future Without Project on page 4.5-65 of the Draft EIR has been revised. Please see the following revised table.

25. Table 4.5-22: Mitigated Emissions – 2035 Future With Project Compared to 2015 Existing Conditions on page 4.5-66 of the Draft EIR has been revised. Please see the following revised table.

26. Table 4.5-24: Mitigated Emissions – 2035 Future With Project and Potential Future Related Development Compared to 2035 Future Without Project on page 4.5-69 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.5-17: Construction Greenhouse Gas Emissions for the *P*~~p~~roposed Project with Mitigation**

| | CONSTRUCTION GHG EMISSIONS, MT $CO_2e$/YEAR | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | CONSTRUCTION YEAR | | | | | | | | | | | | | | |
| **EMISSION SOURCE** | **2017** | **2018** | **2019** | **2020** | **2021** | **2022** | **2023** | **2024** | **2025** | **2026** | **2027** | **2028** | **2029** | **2030** | **TOTAL** |
| Off-Road, On-Site Equipment | 131 | 2,421 | 4,558 | 4,119 | 2,380 | 1,318 | 1,210 | 361 | 88 | 12 | 92 | 0 | 0 | 0 | 16,689 |
| On-Road, On-Site Trucks | 23 | 1,171 | 2,485 | 2,884 | 1,709 | 838 | 341 | 108 | 13 | 8 | 29 | 0 | 0 | 0 | 9,609 |
| On-Road, Off-Site Workers | 22 | 2,322 | 2,983 | 2,260 | 2,052 | 970 | 999 | 410 | 7 | 5 | 20 | 0 | 0 | 0 | 12,052 |
| On-Road, Off-Site Deliveries | *7* ~~6~~ | *238* ~~298~~ | *691* ~~871~~ | *999* ~~1,234~~ | *727* ~~870~~ | *631* ~~732~~ | *344* ~~458~~ | *169* ~~209~~ | 0 | *5* ~~4~~ | *47* ~~39~~ | 0 | 0 | 0 | *3,858* ~~4,721~~ |
| **All Sources (Metric Tons):** | *183* ~~182~~ | *6,152* ~~6,212~~ | *10,717* ~~10,897~~ | *10,261* ~~10,497~~ | *6,868* ~~7,011~~ | *3,757* ~~3,858~~ | *2,895* ~~3,009~~ | *1,047* ~~1,087~~ | 108 | 29 | *189* ~~181~~ | 0 | 0 | 0 | ***42,208*** ~~**43,071**~~ |

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016, *as revised February 2017*.

**Table 4.5-18: Mitigated Emissions - 2015 With Project Compared to 2015 Existing Conditions**

| EMISSION SOURCE | 2015 BASELINE (METRIC TONS $CO_2e$) | 2015 WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 2,511,630 | 2,501,574 | -10,055 |
| Trucks | 531,631 | 519,234 | -12,397 |
| Parking | 23,500 | 22,727 | -773 |
| proposed Project Construction (Amortized) | -- | *1,407* ~~1,436~~ | *1,407* ~~1,436~~ |
| Other Project Mitigated Emissions | 27,488 1/ | 43,232 2/ | 15,744 |
| **Total Net** | **3,094,249** | ***3,088,174*** ~~**3,088,203**~~ | ***-6,074*** ~~**-6,045**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **No** |

NOTES:

1/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

2/ Assumes that the electrical demand power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

**Table 4.5-19: Mitigated Emissions - 2024 Future With Project Compared to 2024 Future Without Project**

| EMISSION SOURCE | 2024 FUTURE WITHOUT PROJECT (METRIC TONS $CO_2e$) | 2024 FUTURE WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 364,405 | 335,624 | -28,781 |
| Trucks | 37,086 | 37,234 | 147 |
| Parking | 23,167 | 22,477 | -690 |
| proposed Project Construction (Amortized) | -- | *1,407* ~~1,436~~ | *1,407* ~~1,436~~ |
| Project Energy Demand 1/ | 18,487 2/ | 29,621 3/ | 11,134 |
| **Total Net** | **443,145** | ***426,363*** ~~**426,381**~~ | ***-16,783*** ~~**-16,754**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **No** |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ Mitigated Emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

**Table 4.5-20: Mitigated Emissions - 2024 Future With Project Compared to 2015 Existing Conditions**

| EMISSION SOURCE | 2015 EXISTING CONDITIONS (METRIC TONS $CO_2e$) | 2024 FUTURE WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 330,236 | 335,624 | 5,388 |
| Trucks | 47,722 | 37,234 | -10,488 |
| Parking | 23,500 | 22,477 | -1,023 |
| proposed Project Construction (Amortized) | -- | *1,407* ~~1,436~~ | *1,407* ~~1,436~~ |
| Project Energy Demand [1/] | 27,488 [2/] | 29,621 [3/] | 2,133 |
| **Total Net** | **428,946** | ***426,366*** ~~**426,392**~~ | ***-2,572*** ~~**-2,554**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **No** |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ Mitigated Emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017)*
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

**Table 4.5-21: Mitigated Emissions - 2035 Future With Project Compared to 2035 Future Without Project**

| EMISSION SOURCE | 2035 FUTURE WITHOUT PROJECT (METRIC TONS $CO_2e$) | 2035 FUTURE WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 316,229 | 266,687 | -49,542 |
| Trucks | 46,060 | 49,209 | 3,149 |
| Parking | 21,111 | 20,667 | -444 |
| proposed Project Construction (Amortized) | -- | *1,407* ~~1,436~~ | *1,407* ~~1,436~~ |
| Project Energy Demand [1/] | 12,254 [2/] | 20,500 [3/] | 8,246 |
| **Total Net** | **395,654** | ***358,470*** ~~**358,499**~~ | ***-37,184*** ~~**-37,155**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **No** |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ Mitigated Emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017)*
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

**Table 4.5-22: Mitigated Emissions - 2035 Future With Project Compared to 2015 Existing Conditions**

| EMISSION SOURCE | 2015 EXISTING CONDITIONS (METRIC TONS $CO_2e$) | 2035 FUTURE WITH PROJECT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 330,236 | 266,687 | -63,549 |
| Trucks | 47,722 | 49,209 | 1,487 |
| Parking | 23,500 | 20,667 | -2,833 |
| proposed Project Construction (Amortized) | -- | *1,407* ~~1,436~~ | *1,407* ~~1,436~~ |
| Project Energy Demand [1/] | 27,488 [2/] | 20,500 [3/] | -6,988 |
| **Total Net** | **428,946** | ***358,470*** ~~**358,499**~~ | ***-70,476*** ~~**-70,447**~~ |
| GHG Threshold for Transportation Projects | | | No Net Increase |
| **Above the Threshold?** | | | **No** |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ Mitigated Emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)

PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

**Table 4.5-24: Mitigated Emissions - 2035 Future With Project and Potential Future Related Development Compared to 2035 Future Without Project**

| EMISSION SOURCE | 2035 FUTURE WITHOUT PROJECT (METRIC TONS $CO_2e$) | 2035 FUTURE WITH PROJECT AND POTENTIAL FUTURE RELATED DEVELOPMENT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 316,229 | 266,687 | -49,542 |
| Trucks | 46,060 | 49,209 | 3,149 |
| Parking | 21,111 | 20,667 | -444 |
| proposed Project Construction (Amortized) | -- | *1,407* ~~1,436~~ | *1,407* ~~1,436~~ |
| Potential Future Development Construction (Amortized) | -- | 382 | 382 |
| Project Energy Demand [1/] | 12,254 [2/] | 20,500 [3/] | 8,246 |
| Future Related-Development | -- | 15,799 | 15,799 |
| **Total Net** | **395,654** | ***374,651*** ~~**374,680**~~ | ***-21,003*** ~~**-20,974**~~ |

NOTES:

1/ $CO_2$ emission rates are estimated based on LADWP 2015 Final Power Integrated Resource Plan for reduction of $CO_2$ Mitigated Emissions between 2015 and 2030.

2/ Assumes that multiple existing rental car facilities and parking garages have roughly equivalent power demands as the proposed Project CONRAC facilities and ITF parking garages.

3/ Assumes that the power factor is 0.85 (85 percent) when converting maximum load to kilowatts (kW) and that annual consumption is 90 percent of maximum hourly consumption. With proposed Project value includes demand at all APM system stations, substations, bridges, and maintenance/storage facility; CONRAC facility; ITF facilities; and associated garages.

SOURCE: Appendix F of this EIR (*as revised February 2017*)

PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

27. Table 4.5-25: Mitigated Emissions – 2035 Future With Project and Potential Future Related Development Compared to 2015 Existing Conditions on page 4.5-69 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.5-25: Mitigated Emissions - 2035 Future With Project and Potential Future Related Development Compared to 2015 Existing Conditions**

| EMISSION SOURCE | 2015 EXISTING CONDITIONS (METRIC TONS $CO_2e$) | 2035 FUTURE WITH PROJECT AND POTENTIAL FUTURE RELATED DEVELOPMENT (METRIC TONS $CO_2e$) | INCREMENTAL DIFFERENCE (METRIC TONS $CO_2e$) |
|---|---|---|---|
| Autos | 330,236 | 266,687 | -63,549 |
| Trucks | 47,722 | 49,209 | 1,487 |
| Parking | 23,500 | 20,667 | -2,833 |
| Proposed Project Construction (Amortized) | -- | *1,407* ~~1,436~~ | *1,407* ~~1,436~~ |
| Potential Future Development Construction (Amortized) | -- | 382 | 382 |
| Project Energy Demand [1/] | 27,488 | 20,500 [3/] | -6,988 |
| Future Related-Development | -- | 15,799 | 15,799 |
| **Total Net** | **428,946** | ***374,651*** ~~**374,680**~~ | ***-54,295*** ~~**-54,266**~~ |

SOURCE: Appendix F of this EIR (*as revised February 2017*)
PREPARED BY: CDM Smith, September 2016*, as revised February 2017*.

## Section 4.6 Hazards and Hazardous Materials

1. The text of Standard Control Measure LAX-HM-1 on page 4.6-29 of the Draft EIR is hereby revised as follows:

> **LAX-HM-1. Ensure Continued Implementation of Existing Remediation Efforts Affected by Onsite Construction.** Prior to initiating construction, LAWA *or its contractor* will conduct a pre-construction evaluation to determine if the proposed construction will interfere with existing soil or groundwater remediation efforts. For sites currently on LAX property, LAWA *or its contractor* will work with tenants to ensure that, to the extent possible, remediation is complete prior to the construction. If remediation must be interrupted to allow for project construction, LAWA *or its contractor* will notify and obtain approval from the regulatory agency with jurisdiction, as required, and will evaluate whether new or increased monitoring will be necessary. If it is determined that contamination has migrated during construction, temporary measures will be taken to stop the migration. As soon as practicable following completion of construction in the area, remediation will be reinstated, if required by the RWQCB or another agency with jurisdiction. In such cases, LAWA *or its contractor* will coordinate the design of the project and the re-design of the remediation systems to ensure that they are compatible and to ensure that the proposed remediation system is comparable to the system originally in place. If it is determined during the pre-construction evaluation that construction will preclude reinstatement of the remediation

program, LAWA *or its contractor* will obtain approval to initiate construction from the agency with jurisdiction.

2. The text of Standard Control Measure LAX-HM-2 on page 4.6-29 of the Draft EIR is hereby revised as follows:

**LAX-HM-2. Ensure Continued Implementation of Existing Remediation Efforts on Parcels Subject to Acquisition.** For properties to be acquired, LAWA *or its contractor* will evaluate the status of all existing soil and groundwater remediation efforts. As part of this evaluation, LAWA *or its contractor* will assess the projected time required to complete the remediation activities and will coordinate with the land owner and the agency with jurisdiction to ensure that remediation is completed prior to scheduled demolition and construction activities, if possible. In cases where remediation cannot be completed prior to demolition and construction activities, LAWA *or its contractor* will notify and obtain approval from the regulatory agency with jurisdiction, as required, and will evaluate whether new or increased monitoring will be necessary. If it is determined that contamination has migrated during construction, temporary measures will be taken to stop the migration. As soon as practicable following completion of construction in the area, remediation will be reinstated, if required by the RWQCB or another agency with jurisdiction. In such cases, LAWA *or its contractor* will coordinate the design of the project component and the re-design of the remediation systems to ensure that they are compatible and to ensure that the proposed remediation system is comparable to the system originally in place. If it is determined during the pre-construction evaluation that construction will preclude reinstatement of the remediation program, LAWA *or its contractor* will obtain approval to initiate construction from the agency with jurisdiction.

3. The first paragraph of Mitigation Measure MM-ST (LAMP)-1 on page 4.6-36 of the Draft EIR is hereby revised as follows:

**MM-ST (LAMP)-1. Construction Traffic Project Task Force.** LAWA would establish a Project Task Force specific to the LAX Landside Access Modernization Program ~~to coordinate deliveries, monitor traffic conditions, advise motorists about detours and congested areas, and monitor and enforce delivery times and routes. The Project Task Force could~~ *that may* be comprised of key stakeholders from LAWA, the Coordination and Logistic Management Team (CALM), other City departments, and others as deemed appropriate. This Project Task Force would *provide input into worksite traffic control plans and other*~~review~~ traffic management plans ~~to mitigate traffic impacts on public roadways and the CTA where possible.~~*that are developed for the Project.* The Project Task Force would review the traffic management plans ~~and work plans~~ to ensure *the following topics are considered*:

4. The second paragraph of Mitigation Measure MM-ST (LAMP)-1 on page 4.6-37 of the Draft EIR is hereby revised as follows:

The Project Task Force would *collaborate with the appropriate groups to* develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction. The Task Force would work closely with other LAWA departments, including Public Relations, Planning and Development, and Operations. The Task Force would also ensure that an innovative and effective construction outreach and communication strategy is developed to keep key stakeholders, businesses, and residents notified and informed during construction of the proposed Project.

5. The third paragraph of Mitigation Measure MM-ST (LAMP)-1 on page 4.6-37 of the Draft EIR is hereby revised as follows:

Prior to initiation of construction, contractors would be required to complete *a Traffic Management Plan (TMP) with associated Haul Routes and* Worksite Traffic Control Plans (WTCP)*, as well as Temporary Traffic Signal Plans (TTS), and Temporary Street Lighting (TSL) Plans if TTSs and TSLs are needed*. The ~~WTCP~~*TMP* would include a description of how the contractor will manage all construction-related traffic*, deliveries, shift hours, parking locations, haul routes, and modifications to shuttle system operations, if any*. The WTCP would detail the ~~haul routes,~~ locations for variable message and other signs,~~ construction deliveries, construction employee shift hours and parking locations,~~ any lane striping changes, *any detours,* and traffic signal modifications~~, and shuttle system operations, if any~~. The WTCP*, TTS, TSL, and Haul Routes* would require ~~approval of~~ *input from* the Project Task Force as well as any appropriate agencies and departments. Contractor compliance would be monitored throughout the duration of their contract. LAWA would require contractors to implement and comply with the following ~~WTCP~~*TMP* measures to reduce construction-related traffic impacts associated with projects at LAX, including:

6. The last sentence under the heading Designated Truck Delivery Hours of Mitigation Measure MM-ST (LAMP)-1. Construction Traffic Project Task Force on page 4.6-37 of the Draft EIR is hereby revised as follows:

Peak Airport traffic periods occur throughout most of the day, therefore, to the extent possible, truck delivery hours shall be limited to overnight hours from 1:00 a.m. to ~~9:00~~ *7:00* a.m.

7. The last sentence of Mitigation Measure MM-ST (LAMP)-3, Worksite Traffic Control Plans, on page 4.6-38 of the Draft EIR is hereby revised as follows:

The WTCP's shall be reviewed and coordinated with the LAWA Project Task Force 30 days in advance of any restriction or closure*, or with as much notice as technically feasible*.

8. The first paragraph and first bullet of Mitigation Measure MM-ST (LAMP)-5, Traffic Maintenance During Construction, on page 4.6-38 of the Draft EIR are hereby revised as follows:

**MM-ST (LAMP)-5. Traffic Maintenance During Construction.** The following would be implemented during construction when ~~the Project Task Force and~~ appropriate City departments or local jurisdictions deem necessary:

~~- A flagperson shall be placed at the truck entry and exit from the Project site.~~

9. The third bullet of Mitigation Measure MM-ST (LAMP)-5, Traffic Maintenance During Construction, on page 4.6-39 of the Draft EIR is hereby revised as follows:

    - Access shall remain unobstructed**,** *or equivalent alternate access provided* for land uses in proximity to the Project site during construction.

## Section 4.7 Hydrology, Water Quality, and Groundwater

1. The first paragraph of Mitigation Measure MM-HWA (LAMP)-1, Stormwater Management Facilities (Project-Specific), on page 4.7-42 of the Draft EIR is hereby revised as follows:

    **MM-HWA (LAMP)-1. Stormwater Management Facilities (Project-Specific). Table 4.7-9** presents the volume of stormwater that would require management to meet the water quality treatment requirement for each proposed Project component, as well as the additional on-site runoff storage/detention that would be needed to fully mitigate peak runoff depth downstream for the 10-year storm event. The design and sizing of drainage system and stormwater quality treatment facilities for the proposed Project shall accommodate those storage requirements. Following Table 4.7-9 is a description of the design provisions for each Project component that *could* meet the storage requirements.

2. The bullets under Mitigation Measure MM-HWA (LAMP)-1, Stormwater Management Facilities (Project-Specific), at the top of page 4.7-43 of the Draft EIR is hereby revised as follows:

    - **CONRAC.** Proposed on-site cisterns will be supplemented to provide an additional 40,000 $ft^3$ of detention in the north and 31,000 $ft^3$ of detention in the south ; a detention design depth of 5 feet would necessitate a footprint of 0.2 acre and 0.1 acre on the facility site, respectively (refer to **Figure 4.7-5**).
    - **ITF East.** A 1.9-acre site for combined retention and detention will be provided*, or functional equivalent,* to retain 70,000 $ft^3$ of runoff for water quality treatment (a 1.3-acre footprint) and detain 130,000 $ft^3$ to meet developed drainage requirements (a 0.6-acre footprint) at the ITF East facility (refer to **Figure 4.7-6**).
    - **ITF West.** A 1.1-acre site for combined retention and detention will be provided*, or functional equivalent,* to retain 45,000 $ft^3$ (0.86 acre) of runoff and detain 50,000 $ft^3$ (0.23 acre) (refer to **Figure 4.7-7**).

- **APM MSF.** A 0.2-acre site for combined retention and detention will be provided*, or functional equivalent,* to retain 7,000 $ft^3$ of runoff (0.13 acre) and detain 16,000 $ft^3$ (0.07 acre) (refer to **Figure 4.7-8**).
- **Roadways and APM Guideway.** For roadways, approximately 2.5 acres of swales will be provided*, or functional equivalent,* to retain 130,000 $ft^3$ of runoff. For the APM guideway, approximately 1 acre of surface-level bioretention features will be provided*, or functional equivalent,* to treat 54,000 $ft^3$ of runoff (refer to **Figures 4.7-9** and **4.7-10**).

## Section 4.8 Land Use and Planning

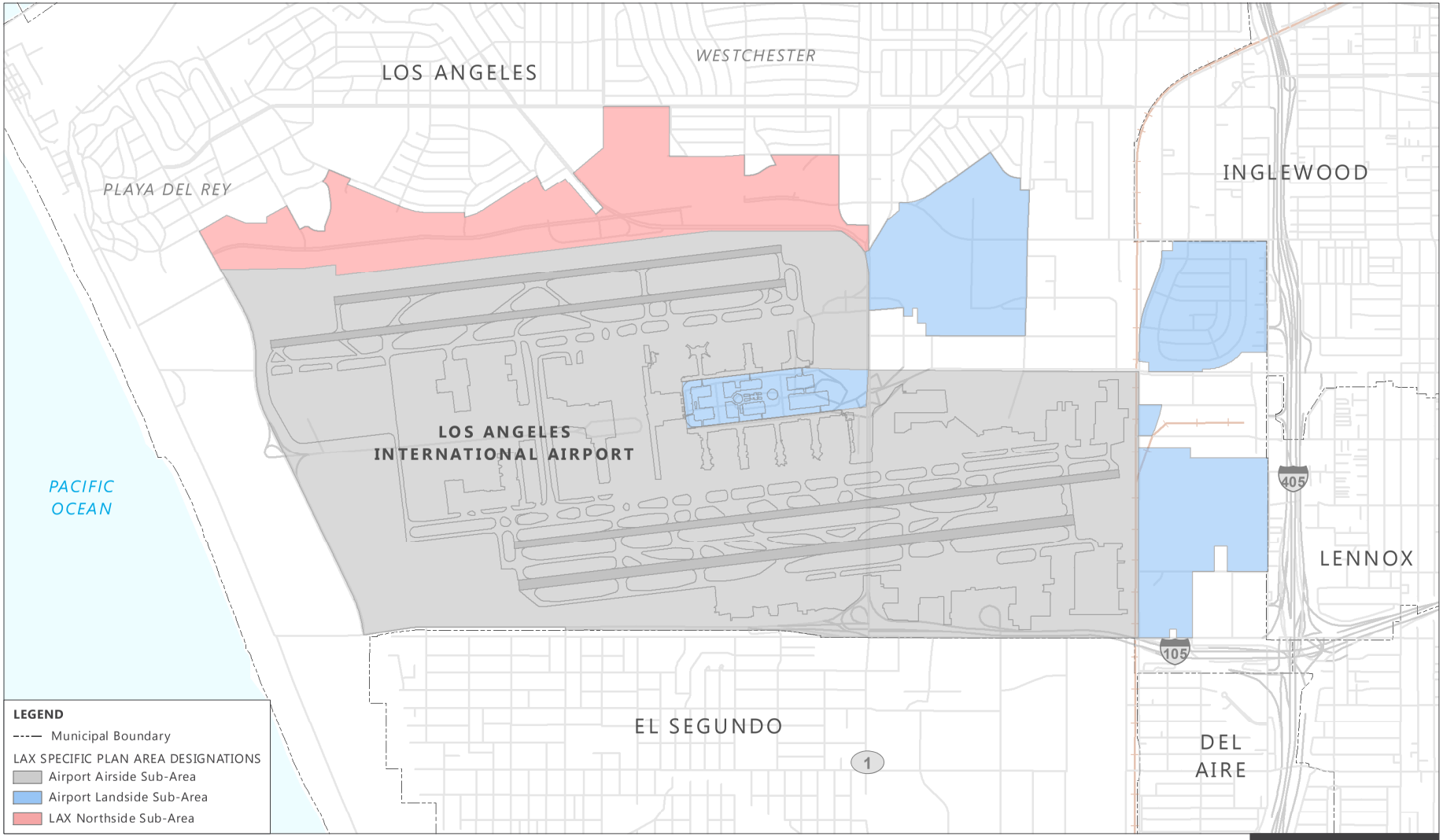
1. Figure 4.8-7: Current LAX Specific Plan Area on page 4.8-27 of the Draft EIR is hereby revised to remove the Belford Area from the existing LAX Specific Plan area. Please see the following revised figure.

2. Section 4.8.3.2 Existing Land Use Setting on page 4.8-29 of the Draft EIR is hereby revised as follows:

   As described in Section 4.8.2, *Methodology*, above, the Project area is encompassed within the North Study Area and the South Study Area. The North Study Area (see Figure 4.8-1) includes airport areas owned and controlled by LAWA and proposed acquisition areas that are subject to improvements under the proposed Project. The existing uses in this area include airport and airport support, including the CTA and airport parking areas, and residential, commercial, and light industrial uses. Similarly, surrounding uses includes airport and airport support, residential, commercial, *educational (i.e., property at northeast corner of Sepulveda Boulevard and 96th Street, which contains two former airplane hangars which West Los Angeles College reports it currently uses for the warehousing of movie set props and for instruction to support its Film/Television Production Crafts certificate program),* and light industrial uses. The South Study Area (Figure 4.8-2), formerly vacant, is currently used as a construction staging area for ongoing development projects at LAX. Surrounding uses include LAX support facilities, a restaurant, and Imperial Highway and the 105 Freeway. The following describes existing land uses where each of the main components of the Project is proposed.

3. The fifth row, second column of Table 4.8-3 (page 1 of 5) on page 4.8-45 of the Draft EIR is hereby revised as follows:

   Consistent. The Project features grade separation between roadways, the APM and the Metro *Crenshaw/LAX and Green Lines*~~line~~ in order to avoid conflict.




SOURCES: Los Angeles County, 2010, 2011 (city boundary, streets); LAX Airport Layout Plan, Ricondo & Associates, Inc., 2010 (runways, taxiways, terminal area, ariport property boundary); U.S. Census, 2013 TIGER/Line Shapefiles, accessed online: http://www.census.gov/cgi-bin/geo/shapefiles2013/main, March 2014; City of Los Angeles, LAX Specific Plan, September 2004, as amended by Ordinance 182542 on September 2013.;
PREPARED BY: Ricondo & Associates, Inc., September 2016.

**FIGURE 4.8-7**

Current LAX Specific Plan Area

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## Section 4.9 Noise

1. Table 4.9.3-1: Project Area Existing Ambient Noise Receptors on page 4.9-28 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.9.3-1: Project Area Existing Ambient Noise Receptors**

| RECEPTOR ID | EXISTING LAND USE | APPROXIMATE ADDRESS |
|---|---|---|
| RP1 | Concourse Hotel[1/] | 6225 W Century Blvd, Los Angeles |
| RP2 | LAX Sheraton Gateway Hotel | 6107 W 98th Street, Los Angeles |
| RP3 | LAX Sheraton Gateway Hotel | 6101 W Century Blvd, Los Angeles |
| RP4 | Office Building | 6052 W 98th St, Los Angeles |
| RP5 | Four Points Sheraton Hotel | 9750 Airport Blvd, Los Angeles |
| RP6[~~1/~~ 2/] | Residential Development | 9520 Belford Ave, Los Angeles |
| RP7[~~1/~~ 2/] | ~~Residential Development~~ *Warehousing/Freight Forward* | 5651 W 96th St, Los Angeles |
| RP8[~~1/~~ 2/] | ~~Residential Development~~ *Neutrogena* | 5705 W 98th St, Los Angeles |
| ~~RP9[1/]~~ *RP11*[2/] | Residential Development | 9329 Isis Ave, Los Angeles |
| ~~RP10[1/]~~ *RP9*[2/] | Bright Star Secondary Charter Academy/Residential Development | 5431 W 98th St, Los Angeles |
| ~~RP11[1/]~~ *RP10*[2/] | Residential Development | 5450 W 99th Pl, Los Angeles |
| ~~RP12[1/]~~ *RP14*[2/] | Residential Development | 9312 Glasgow Pl, Los Angeles |
| RP13[~~1/~~ 2/] | Residential Development | 9714 Glasgow Pl, Los Angeles |
| ~~RP14[1/]~~ *RP12*[2/] | Residential Development | 9846 Glasgow Pl, Los Angeles |
| RP15 | Residential Development | 700 W Arbor Vitae St, Los Angeles |

NOTE*S*:

*1/ At the time of preparation of the Draft EIR, the hotel at 6225 W. Century Boulevard was named the Concourse Hotel. In October 2016, the Concourse Hotel was renamed as the Hyatt Regency Los Angeles International Airport.*

~~1/~~ *2/* Existing facility would be acquired and demolished prior to Project implementation.

SOURCE: Appendix M of this EIR*, as revised February 2017*.
PREPARED BY: Ricondo & Associates, Inc., September 2016*, as revised February 2017.*

2. The second sentence of the second paragraph on page 4.9-34 of the Draft EIR is hereby revised as follows:

> As shown, 24-hour CNEL values within the Project area ranged from a high of 77.4 dB(A) (RP2 – LAX Sheraton Gateway Hotel) to a low of 62.7 dB(A) (~~RP14~~ *RP12* – Residential Development).

3. Table 4.9.3-3: Project Area Existing Ambient Noise Levels on page 4.9-35 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.9.3-3: Project Area Existing Ambient Noise Levels**

| RECEPTOR ID | EXISTING LAND USE | DURATION | 24-HR CNEL (DBA) | 1-HOUR MAX $L_{EQ}$ (DBA) |
|---|---|---|---|---|
| RP1 | Concourse Hotel[1/] | 1 hour | ~~N/A~~ *76.3*[2/] | 76.3 ~~1/~~ *3/* |
| RP2 | LAX Sheraton Gateway Hotel | 24 hours | 77.4 | 75.3 |
| RP3 | LAX Sheraton Gateway Hotel | 24 hours | 72.4 | 71.4 |
| RP4 | Office Building | 24 hours | 75.9 | 75.6 |
| RP5 | Four Points Sheraton Hotel | 24 hours | 71.7 | 71.7 |
| RP6 | Residential Development | 24 hours | 68.2 | 66.4 |
| RP7 | ~~Residential Development~~ *Warehousing/Freight Forwarding* | 24 hours | 71.7 | 70.7 |
| RP8 | ~~Residential Development~~ *Neutrogena* | 24 hours | 72.4 | 72.7 |
| ~~RP9~~ *RP11* | Residential Development | 24 hours | 70.0 | 69.3 |
| ~~RP10~~ *RP9* | Bright Star Secondary Charter Academy/Residential Development | 24 hours | 67.3 | 67.6 |
| ~~RP11~~ *RP10* | Residential Development | 24 hours | 64.7 | 63.3 |
| ~~RP12~~ *RP14* | Residential Development | 24 hours | 69.9 | 69.7 |
| RP13 | Residential Development | 24-hours | 64.4 | 65.4 |
| ~~RP14~~ *RP12* | Residential Development | 24 hours | 62.7 | 65.5 |
| RP15 | Residential Development | 24 hours | 69.8 | 67.3 |

NOTE*S*:

*1/ At the time of preparation of the Draft EIR, the hotel at 6225 W. Century Boulevard was named the Concourse Hotel. In October 2016, the Concourse Hotel was renamed as the Hyatt Regency Los Angeles International Airport.*

*2/ Due to technical complications with the 24-hour measurement, it was not possible to calculate the existing ambient CNEL. As a conservative assumption, the 24-hour CNEL for this receptor was assumed to be the same as the 1-hour maximum Leq; however, as indicated by other receptor locations nearby (i.e., RP2 through RP4), CNEL values are typically higher than the 1-hour values. The comparatively higher CNEL values reflect the fact that noise events occurring during evening and nighttime hours are assigned 5 dB and 10 dB "noise penalties" as would be the case for airport-related uses in the subject area (i.e., hotels, parking lots, and major roadways) having relatively higher activity levels during such hours, as compared to other areas such as residential development to the east (i.e., RP10 through RP15).*

~~1/~~*3/* Two peak-hour measurements at the Concourse Hotel were supplemented due to technical complications with the 24-hour measurement. The higher of the two peak-hour measurements at the Concourse Hotel was 76.3 dBA.

SOURCE: Appendix M of this EIR, September 2016*, as revised February 2017*.
PREPARED BY: Ricondo & Associates, Inc., September 2016*, as revised February 2017.*

4. The last sentence at the bottom of page 4.9-47 and continuing to the top of page 4.9-48 of the Draft EIR is hereby revised as follows:

> The closest noise-sensitive receptor to this construction area is a hotel, Renaissance Hotel (RP5), ~~north of Westchester Parkway,~~ located on the corner of W. 98th Street and Airport Boulevard approximately 450 feet southeast of the ITF structure.

5. The last sentence on page 4.9-48 and continuing to the top of page 4.9-49 of the Draft EIR is hereby revised as follows:

> The closest noise-sensitive receptors to this construction area are hotels, Travelodge Hotel (~~RP11~~ *near RP10*), located along Aviation Boulevard approximately 50 feet south, and the Westin Hotel, La Quinta Inn, and Holiday Inn (~~RP14~~ *near RP12*), located along W. Century Boulevard approximately 100 feet south, 50 feet south, and 50 feet south, respectively, from the closest point of construction-related activities.

6. The second sentence under the heading ITF East on page 4.9-49 of the Draft EIR is hereby revised as follows:

> The closest noise-sensitive receptors to this construction area are hotels, Travelodge Hotel (~~RP11~~ *near RP10*), located along Aviation Boulevard approximately 200 feet south from the closest point of construction-related activities.

7. The second sentence under the heading CONRAC and Associated Roadways on page 4.9-49 of the Draft EIR is hereby revised as follows:

> The closest noise-sensitive receptors to this construction area are hotels, Travelodge Hotel (~~RP11~~ *near RP10*), located along Aviation Boulevard approximately 600 feet southwest, and the Westin Hotel, La Quinta Inn, and Holiday Inn (~~RP14~~ *near RP12*), located along W. Century Boulevard approximately 700 feet south, 650 feet south, and 500 feet south, respectively, from the closest point of construction-related activities.

8. The first two paragraphs on page 4.9-51 of the Draft EIR are hereby revised as follows:

> The existing 1,700 feet of W. 96th Street from just east of Vicksburg Avenue to Airport Boulevard would be closed and pavement would be demolished, including 96th Place. The closest noise-sensitive receptor to *the west end of* this construction area *would be the West Los Angeles College (WLAC) facility,* ~~Courtyard Marriot (RP2)~~ located ~~at the corner of Vicksburg Avenue and W. 98th Street~~ approximately ~~575~~ *500* feet south*west* from the closest point of construction-related activities.
>
> Based on existing ambient noise levels of ~~77.4~~ *76.3* dB(A) CNEL in the area of the ~~Courtyard Marriot~~ *Concourse* Hotel (refer to Table 4.9.3-3*, as revised in Chapter 3 of the Final EIR*), *which is south of, and near to, the WLAC site,* the distance at which construction equipment noise would result in a 5 dB(A) increase over the existing ambient noise level would be approximately ~~185~~ *100* feet. Noise sensitive uses with existing ambient noise of ~~77.4~~ *76.3* dB(A) CNEL would be significantly impacted if construction activity occurred within a distance of ~~185~~ *100* feet or less. These distances do not account for any intervening topography, buildings, or other obstructions that would further reduce noise. Given the distance to the closest sensitive receptor is greater

than ~~185~~ *100* feet, construction equipment noise impacts on sensitive receptors from construction activities for the W. 96th Street closure and demolition would be less than significant because construction activities would not exceed ambient exterior noise level by 5 dB(A) at a noise sensitive use.

9. The second sentence under the heading AVIATION BOULEVARD on page 4.9-52 of the Draft EIR is hereby revised as follows:

   The closest noise-sensitive receptors to this construction area is the Travelodge Hotel (~~RP11~~ *near RP10*), located along Aviation Boulevard approximately 125 feet east from the closest point of construction-related activities.

10. The last sentence on page 4.9-52 and continuing to the top of page 4.9-53 of the Draft EIR is hereby revised as follows:

    The closest noise-sensitive use to this construction area is the Travelodge Hotel (~~RP11~~ *near RP10*), located along Aviation Boulevard approximately 315 feet east from the closest point of construction-related activities.

11. The second sentence under the heading CONCOURSE WAY on page 4.9-53 of the Draft EIR is hereby revised as follows:

    The closest noise-sensitive use to this construction area is the Travelodge Hotel (~~RP11~~ *near RP10*), located along Aviation Boulevard approximately 700 feet west from the closest point of construction-related activities.

12. The second sentence under the heading W. CENTURY BOULEVARD on page 4.9-54 of the Draft EIR is hereby revised as follows:

    The closest-noise sensitive receptor to this construction area are hotels, LAX Sheraton Gateway Hotel (RP2) and Travelodge Hotel (~~RP11~~ *near RP10*), approximately 125 feet south and 300 feet west from the closest point of construction-related activities, respectively.

13. The first sentence of Standard Control Measure (Mitigation Measure) LAX-N-1 on page 4.9-59 of the Draft EIR is hereby revised as follows:

    - **LAX-N-1. Construction-Related Noise Control.** The following measures shall be implemented to reduce construction-related noise impacts~~ associated with the LAX Landside Access Modernization Program~~:

14. Mitigation Measure MM-N (LAMP)-1, Noise Curtains, on page 4.9-60 of the Draft EIR is hereby revised as follows:

**MM-N (LAMP)-1. Noise Curtains.** LAWA shall require construction contractors to use noise curtains*, noise blankets, temporary sound walls, or their equivalent* during construction to shield nearby sensitive receptors from construction equipment-related noise when an increase of 5 dB(A) is projected to occur over the baseline exterior level. To verify efficiency of the noise ~~curtains~~ *reduction features*, LAWA will measure construction noise levels at the closest sensitive receptors in compliance with City of Los Angeles standards. If noise levels exceed the 5 dB(A) increase, LAWA will implement additional technological solutions and installation equipment and will repeat measuring construction noise levels, until an increase of 5 dB(A) does not occur.

15. The second paragraph under the heading 4.9.4.6 Cumulative Impacts on page 4.9-72 of the Draft EIR is hereby revised as follows:

Within the vicinity of the Project area, the alignment of the proposed Metro Crenshaw/LAX light rail line would extend along the west side of Aviation Boulevard north of Century Boulevard. The operational noise level associated with the system near Century Boulevard and Aviation Boulevard would be 60 dB(A) Ldn at a distance of 123 feet from the rail network.[28] Relative to the transit-related noise-sensitive receptors within the Project area~~, sensitive receptors along W. 96th Street (RP7 – Residential Development) and along W. 98th Street (RP8 – Residential Development) would be the nearest to the future Metro Crenshaw/LAX Transit Corridor, both at a distance of approximately 425 feet.~~ *that would remain after Project implementation (i.e., as indicated above in Section 4.9.4.5, sensitive receptors RP6 through RP14 would be acquired by LAWA and demolished before or as part of Project implementation), the closest sensitive receptor to the Metro Crenshaw/LAX light rail line would be RP5, located approximately 2,200 feet west of the subject line.* Based on a sound drop-off rate of 4.5 dB per doubling of distance, the Metro Crenshaw/LAX Transit Corridor noise would dissipate to ~~51.9~~ *41.2* dB at sensitive receptor~~s RP7 and RP8~~ *RP5*. Combined with the ambient environment and noise generated from the APM, noise levels at sensitive receptor~~s RP7 and RP8~~ *RP5* would not result in an appreciable increase from the Metro Crenshaw/LAX Transit Corridor because noise levels would remain ~~at 74.5 dB(A) and 72.5 dB(A), respectively. It is also important to note that these receptors would be acquired by LAWA and demolished prior to Project implementation~~ *close to the existing ambient noise level. Specifically, the existing ambient noise level is approximately 71.7 dB(A), the future ambient plus proposed APM guideway would be approximately 71.8 dB(A) (see Table 4.9.4.1), and the future cumulative noise level for ambient plus APM guideway noise plus Metro Crenshaw/LAX Transit Corridor noise would be approximately 71.8 dB(A)*. Therefore, cumulative transit noise impacts would be less than significant.

[28] Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Statement/Final Environmental Impact Report, August 2011.

## Section 4.11 Public Services

1. The first paragraph of Mitigation Measure MM-ST (LAMP)-1 on page 4.11-29 of the Draft EIR is hereby revised as follows:

> **MM-ST (LAMP)-1. Construction Traffic Project Task Force.** LAWA would establish a Project Task Force specific to the LAX Landside Access Modernization Program ~~to coordinate deliveries, monitor traffic conditions, advise motorists about detours and congested areas, and monitor and enforce delivery times and routes. The Project Task Force could~~ *that may* be comprised of key stakeholders from LAWA, the Coordination and Logistic Management Team (CALM), other City departments, and others as deemed appropriate. This Project Task Force would *provide input into worksite traffic control plans and other*~~review~~ traffic management plans ~~to mitigate traffic impacts on public roadways and the CTA where possible.~~*that are developed for the Project.* The Project Task Force would review the traffic management plans ~~and work plans~~ to ensure *the following topics are considered*:

2. The second paragraph of Mitigation Measure MM-ST (LAMP)-1 on page 4.11-30 of the Draft EIR is hereby revised as follows:

> The Project Task Force would *collaborate with the appropriate groups to* develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction. The Task Force would work closely with other LAWA departments, including Public Relations, Planning and Development, and Operations. The Task Force would also ensure that an innovative and effective construction outreach and communication strategy is developed to keep key stakeholders, businesses, and residents notified and informed during construction of the proposed Project.

3. The third paragraph of Mitigation Measure MM-ST (LAMP)-1 on page 4.11-30 of the Draft EIR is hereby revised as follows:

> Prior to initiation of construction, contractors would be required to complete *a Traffic Management Plan (TMP) with associated Haul Routes and* Worksite Traffic Control Plans (WTCP)*, as well as Temporary Traffic Signal Plans (TTS), and Temporary Street Lighting (TSL) Plans if TTSs and TSLs are needed*. The ~~WTCP~~*TMP* would include a description of how the contractor will manage all construction-related traffic*, deliveries, shift hours, parking locations, haul routes, and modifications to shuttle system operations, if any*. The WTCP would detail the ~~haul routes,~~ locations for variable message and other signs,~~ construction deliveries, construction employee shift hours and parking locations,~~ any lane striping changes, *any detours,* and traffic signal modifications~~, and shuttle system operations, if any~~. The WTCP*, TTS, TSL, and Haul Routes* would require ~~approval of~~ *input from* the Project Task Force as well as any appropriate agencies and departments. Contractor compliance would be monitored throughout the duration of their contract. LAWA would require contractors to implement and comply with the following ~~WTCP~~*TMP* measures to reduce construction-related traffic impacts associated with projects at LAX, including:

4. The last sentence under the heading Designated Truck Delivery Hours of Mitigation Measure MM-ST (LAMP)-1. Construction Traffic Project Task Force on page 4.11-30 of the Draft EIR is hereby revised as follows:

   Peak Airport traffic periods occur throughout most of the day, therefore, to the extent possible, truck delivery hours shall be limited to overnight hours from 1:00 a.m. to ~~9:00~~ *7:00* a.m.

5. The last sentence of Mitigation Measure MM-ST (LAMP)-3, Worksite Traffic Control Plans, on page 4.11-31 of the Draft EIR is hereby revised as follows:

   The WTCP's shall be reviewed and coordinated with the LAWA Project Task Force 30 days in advance of any restriction or closure*, or with as much notice as technically feasible*.

6. The first paragraph and first bullet of Mitigation Measure MM-ST (LAMP)-5, Traffic Maintenance During Construction, on page 4.11-32 of the Draft EIR are hereby revised as follows:

   **MM-ST (LAMP)-5. Traffic Maintenance During Construction.** The following would be implemented during construction when ~~the Project Task Force and~~ appropriate City departments or local jurisdictions deem necessary:

   ~~- A flagperson shall be placed at the truck entry and exit from the Project site.~~

7. The third bullet of Mitigation Measure MM-ST (LAMP)-5, Traffic Maintenance During Construction, on page 4.11-32 of the Draft EIR is hereby revised as follows:

   - Access shall remain unobstructed*, or equivalent alternate access provided* for land uses in proximity to the Project site during construction.

8. The title of the mitigation measure under the heading 4.11.3.7 Mitigation Measures on page 4.11-55 of the Draft EIR is hereby revised as follows:

   **~~LAX~~ *MM*-PS (LAMP)-1 – School Relocation*s*~~ Impacts~~**

9. The first two sentences under the heading 4.11.3.8 Level of Significance after Mitigation on page 4.11-55 of the Draft EIR are hereby revised as follows:

   With implementation of Mitigation Measure ~~LAX~~ *MM*-PS (LAMP)-1, the proposed Project's significant impacts to school facilities would be reduced to a level that is less than significant, because this measure describes LAUSD's required CEQA review prior to relocation of the schools to other sites, including mitigation obligations. However, because implementation of Mitigation Measure ~~LAX~~ *MM*-PS (LAMP)-1 is within the responsibility and jurisdiction of a public agency other than LAWA (i.e., LAUSD), LAWA cannot require it to be implemented.

## Section 4.12.2 Off-Airport Transportation

1. The second sentence of the first paragraph on page 4.12-6 of the Draft EIR is hereby revised as follows:

> As part of this process, adjustments were made to the 2014 passenger mode splits to reflect the two Intermodal Transportation Facilities (ITFs) and the Consolidated Rental Car Facility (CONRAC), and how changes to the regional transportation network, including *the* Metro *Crenshaw/LAX Line and Green Line* ~~rail~~, would affect passenger mode choice and resultant vehicle activity at the Airport.

2. The first two sentences under the Traffic Count Data heading on page 4.12-59 of the Draft EIR are hereby revised as follows:

> Existing traffic volumes were compiled using video footage during morning and evening peak hours collected between 2013 and 2016~~5~~. Data for ~~13~~3 of 183 intersections was collected in 2016~~5~~; *while* data *was collected for 130 intersections in 2015 and* for 44 intersections ~~was collected~~ in 2014.

3. Table 4.12.2-5: Summary of Intersection Level of Service Analysis – 2015 Existing Conditions on page 4.12-62 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.12.2-5: Summary of Intersection Level of Service Analysis – 2015 Existing Conditions**

| LEVEL OF SERVICE | AM PEAK HOUR | MD PEAK HOUR | PM PEAK HOUR |
|---|---|---|---|
| A | 45 | *26*~~27~~ | 40 |
| B | 38 | *6*~~5~~ | 37 |
| C | 41 | 3 | 40 |
| D | 36 | 0 | 38 |
| E | 15 | 1 | 20 |
| F | 8 | 0 | 8 |
| Total | 183 | 36 [1/] | 183 |

NOTE:

1/ As discussed in Section 4.12.2.2, Methodology, only select intersections were studied for the midday peak hour.

SOURCE: Raju Associates, Inc., Draft Transportation Study for the Landside Access Modernization Program DEIR, September 2016. (Appendix O of this EIR*, as revised February 2017*).

PREPARED BY: Ricondo and Associates, Inc., September 2016*, as revised February 2017*.

4. Table 4.12.2-6: Detailed Intersection Level of Service Analysis – 2015 Existing Conditions (page 9 of 9) on page 4.12-71 of the Draft EIR has been revised. Please see the following revised table.

**Table 4.12.2-6 (9 of 9): Detailed Intersection Level of Service Analysis – 2015 Existing Conditions**

| | | A.M. PEAK HOUR | | M.D. PEAK HOUR | | P.M. PEAK HOUR | |
|---|---|---|---|---|---|---|---|
| MAP NO. | INTERSECTION | V/C | LOS | V/C | LOS | V/C | LOS |
| 168 | Walgrove Avenue and Washington Boulevard 3/ | *** | F | --- | --- | *** | F |
| 169 | Washington Boulevard and Washington Place at Wade Street | 0.688 | B | --- | --- | 0.866 | D |
| 170 | Inglewood Boulevard and Washington Boulevard | 0.784 | C | --- | --- | 0.940 | E |
| 171 | Sawtelle Boulevard and I-405 Southbound Ramp (s/o Washington Boulevard) | 0.408 | A | --- | --- | 0.477 | A |
| 172 | Washington Boulevard and Washington Place at Tilden Avenue | 0.556 | A | --- | --- | 0.621 | B |
| 173 | Overland Avenue and Sawtelle Boulevard ~~3/~~ 4/ | 35.2 s | E | --- | --- | 49.5 s | E |
| 174 | Canfield Avenue-Washington Boulevard (Ince Blvd) and Culver Boulevard | 0.691 | B | --- | --- | 0.617 | B |
| 175 | Ince Boulevard and Washington Boulevard | 0.849 | D | --- | --- | 0.805 | D |
| 176 | National Boulevard and Venice Boulevard | 0.699 | B | --- | --- | 0.783 | C |
| 177 | National Boulevard and Washington Boulevard | 0.666 | B | --- | --- | 0.808 | D |
| 178 | La Cienega Boulevard and Washington Boulevard | 0.872 | D | --- | --- | 0.882 | D |
| 179 | Centinela Avenue and Florence Avenue | 0.866 | D | --- | --- | 0.745 | C |
| 180 | Prairie Avenue and Florence Avenue | 0.776 | C | --- | --- | 0.798 | C |
| 181 | Van Ness Avenue and Manchester Avenue | 0.916 | E | --- | --- | 0.914 | E |
| 182 | Van Ness Avenue and Century Boulevard | 0.638 | B | --- | --- | 0.649 | B |
| 183 | Van Ness Avenue and Imperial Highway | 0.788 | C | --- | --- | 0.806 | D |

NOTES:

--- = not studied

1/ Los Angeles County Congestion Management Program (CMP) arterial monitoring location.

2/ ~~Unsignalized intersection.~~ *Stop-controlled on minor approach under existing conditions. Worst-case approach delay (in seconds) is reported in table.* Analyzed using CMA methodology to determine increase in V/C.

3/ ~~Unsignalized intersection.~~ *Stop-controlled on minor approach. Worst-case approach delay (in seconds) is reported in table.* Analyzed using ICU methodology to determine increase in V/C.

*4/ All-way stop-controlled intersection. Intersection average vehicle delay (in seconds) is reported in table. Analyzed using ICU methodology to determine change in V/C.*

*** Indicates oversaturated conditions. (A traffic movement is oversaturated when the traffic demand for the movement exceeds the green-time capacity of the traffic signal such that a queue that exists at the beginning of the green time is not fully dissipated at the end of the green time for that movement.) Delay cannot be determined.

SOURCES: Raju Associates, Inc., *Draft Transportation Study for the Landside Access Modernization Program DEIR*, September 2016. (Appendix O of this EIR*, as revised February 2017*)

PREPARED BY: Ricondo and Associates, Inc., September 2016*, as revised February 2017*.

5. Table 4.12.2-10: On- and Off-Ramp Junctions Analyzed on page 4.12-80 of the Draft EIR has been revised; the bottom row of text was inadvertently duplicated. Please see the following revised table.

**Table 4.12.2-10: On- and Off-Ramp Junctions Analyzed**

| ***OFF~~ON~~*-RAMP JUNCTIONS** | ***ON~~OFF~~*-RAMP JUNCTIONS** |
|---|---|
| Lincoln Boulevard and SR-90 Ramps | Centinela Avenue and Sanford Street/SR-90 Westbound Ramps |
| Centinela Avenue and Sanford Street/SR-90 Westbound Ramps | Centinela Avenue and SR-90 Eastbound On-/Off-Ramps |
| Centinela Avenue and SR-90 Eastbound On-/Off-Ramps | Sawtelle Boulevard and Matteson Street/I-405 Southbound Ramps (s/o Venice Boulevard) |
| Sawtelle Boulevard and Matteson Street/I-405 Southbound Ramps (s/o Venice Boulevard) | I-405 Southbound Ramps and Jefferson Boulevard |
| I-405 Southbound Ramps and Jefferson Boulevard | I-405 Northbound Ramps and Jefferson Boulevard |
| I-405 Northbound Ramps and Jefferson Boulevard | Sepulveda Boulevard and I-405 Northbound On-/Off-Ramps (s/o Venice Boulevard) |
| Sepulveda Boulevard and I-405 Northbound On-/Off-Ramps (s/o Venice Boulevard) | I-405 Southbound Ramps and Howard Hughes Parkway |
| Sepulveda Boulevard and I-105 Westbound Off-Ramp (n/o Imperial Highway) | I-405 Northbound Ramps and La Tijera Boulevard |
| SR-90 ~~Westbound~~ Ramps and Slauson Avenue | I-405 Southbound Ramps and La Tijera Boulevard |
| I-405 Southbound Ramps and Howard Hughes Parkway | I-105 Ramps (e/o Aviation Boulevard) and Imperial Highway |
| Nash Street /I-105 Westbound Ramps and Imperial Highway | La Cienega Boulevard and I-405 Southbound Ramps (n/o Century Boulevard) |
| I-405 Northbound Ramps and La Tijera Boulevard | La Cienega Boulevard and I-405 Southbound Ramps (s/o Century Boulevard) |
| I-405 Southbound Ramps and La Tijera Boulevard | La Cienega Boulevard and I-405 Southbound Ramps (n/o Imperial Highway) |
| I-105 Ramps (e/o Aviation Boulevard) and Imperial Highway | I-405 Northbound Off-Ramp/Ash Avenue and Manchester Avenue |
| La Cienega Boulevard and I-405 Southbound Ramps (n/o Century Boulevard) | I-405 Northbound Ramps and Century Boulevard |
| La Cienega Boulevard and I-405 Southbound Ramps (s/o Century Boulevard) | I-405 Northbound Ramps (e/o La Cienega Boulevard) and Imperial Highway (eastbound direction) |
| La Cienega Boulevard and I-405 Southbound Ramps (n/o Imperial Highway) | I-405 Northbound Ramps (e/o La Cienega Boulevard) and Imperial Highway (westbound direction) |
| I-405 Northbound Off-Ramp/Ash Avenue and Manchester Avenue | I-405 Northbound Ramps and El Segundo Boulevard (eastbound direction) |
| I-405 Northbound Ramps and Century Boulevard | I-405 Northbound Ramps and El Segundo Boulevard (westbound direction) |
| I-405 Northbound Ramps (e/o La Cienega Boulevard) and Imperial Highway | I-405 Northbound Ramps and Rosecrans Avenue (eastbound direction) |
| I-405 Northbound Ramps and El Segundo Boulevard | I-405 Northbound Ramps and Rosecrans Avenue (westbound direction) |
| I-405 Northbound Ramps and Rosecrans Avenue | I-105 Eastbound On-Ramp (e/o Hawthorne Boulevard) and Imperial Highway |
| Hawthorne Boulevard and I-105 Westbound Ramps/111th Street | I-405 Northbound Ramps and Culver Boulevard |
| Prairie Avenue and West 112th Street/I-105 Off-Ramp | ~~Centinela Avenue and Sanford Street/SR-90 Westbound Ramps~~ |
| I-405 Northbound Ramps and Culver Boulevard | ~~Centinela Avenue and SR-90 Eastbound On-/Off-Ramps~~ |
| Sawtelle Boulevard and I-405 Southbound Off-Ramp (n/o of Culver Boulevard) | ~~Sawtelle Boulevard and Matteson Street/I-405 Southbound Ramps (s/o Venice Boulevard)~~ |
| | ~~I-405 Southbound Ramps and Jefferson Boulevard~~ |

SOURCE: Raju Associates, Inc., *Draft Transportation Study for the Landside Access Modernization Program DEIR*, September 2016. (Appendix O of this EIR, *as revised February 2017*)

PREPARED BY: Ricondo and Associates, Inc., September 2016, *as revised February 2017*.

6. Section 4.12.2.3.1 Existing Street System, starting with the second bullet on page 4.12-83 of the Draft EIR, is hereby revised as follows:

- **Airport Boulevard** is a ~~Class II Major Highway~~ *Boulevard II arterial roadway* that runs north-south with two to three lanes in each direction plus left-turn channelization at major intersections in the Study Area. Parking is generally prohibited on both sides of Airport Boulevard, and the posted speed limit is 35 mph.
- **Arbor Vitae Street** is *classified as a Boulevard II arterial roadway* ~~a Class II Major Highway~~ north of LAX that runs east-west with generally two lanes in each direction plus left-turn channelization at most major intersections throughout the Study Area. Restricted parking is allowed along certain segments of Arbor Vitae Street, and the posted speed limit is 35 mph.
- **Aviation Boulevard** is *classified as a Boulevard II arterial roadway* ~~a Class II Major Highway~~ that runs north-south with two lanes in each direction plus left-turn channelization at major intersections in the Study Area. Parking is generally prohibited on both sides of Aviation Boulevard, and the posted speed limit is 40 mph.
- **Centinela Avenue** ~~is a Major Arterial (in Inglewood) and a Class II Major Highway (in the City of Los Angeles) with two to three lanes in each direction plus left-turn channelization at major intersections throughout the Study Area. Centinela Avenue~~ runs east-west to the east of Jefferson Boulevard and north-south to the north of Jefferson Boulevard. *The roadway section north of Jefferson Boulevard is classified as a primary arterial roadway within the City of Culver City and an Avenue I arterial roadway within the City of Los Angeles and generally provides four travel lanes, two in each direction. East of Jefferson Boulevard, the roadway is classified as a Boulevard II arterial roadway in the City of Los Angeles and major arterial roadway in the City of Inglewood. The roadway along this stretch generally provides two to three travel lanes in each direction.* Parking is allowed along Centinela Avenue with some restrictions, and the posted speed limit is 40 mph.
- **Century Boulevard** is a ~~Class II Major Highway~~ *modified Boulevard I arterial roadway* that runs east-west and directly feeds into the LAX CTA. It has three to four lanes in each direction plus left-turn channelization at major intersections throughout the Study Area. Parking is not allowed along Century Boulevard, and the posted speed limit is 35 mph.
- **Crenshaw Boulevard** is *classified as* a Major Arterial that runs north-south with two to three lanes in each direction plus left-turn channelization at major intersections throughout the Study Area. Parking is allowed on certain segments of Crenshaw Boulevard, and the posted speed limit ranges from 35 to 40 mph.
- **Culver Boulevard** is a *primary arterial within the City of Culver City and an Avenue I arterial roadway within the City of Los Angeles. It transverses diagonally in an east-west direction from Playa del Rey to its terminus at Venice Boulevard. Within the Study Area, this roadway generally provides four travel lanes,* ~~Class II Major Highway with~~ two lanes in each direction, plus left-turn channelization at major intersections ~~in the Study Area~~. Parking is generally not allowed along Culver Boulevard but there are some segments with restricted parking. The posted speed limit is 40 mph.
- **Douglas Street** is a ~~S~~*s*econdary ~~A~~*a*rterial *in the City of El Segundo* that runs north-south with two to

three lanes in each direction plus left-turn channelization at major intersections throughout the Study Area. Parking is generally not allowed along Douglas Street but there are some segments with restricted parking. The posted speed limit is 40 mph.

- **Duquesne Avenue** is a secondary arterial roadway in Culver City that traverses in a north-south direction. This roadway offers two travel lanes, one lane per direction. On-street parking is generally allowed on both sides of the street. The posted speed limit is 35 miles per hour.
- **El Segundo Boulevard** is *classified as* a ~~M~~*m*ajor ~~A~~*a*rterial *in the City of El Segundo*. ~~south of LAX that~~ *It* runs east-west with one to three lanes in each direction plus left-turn channelization at major intersections throughout the Study Area. Parking is allowed on certain segments ~~along El Segundo Boulevard~~, and the posted speed limit ranges from 35 to 40 mph.
- **Florence Avenue** is *classified as* a ~~M~~*m*ajor ~~A~~*a*rterial *in the City of Inglewood.* ~~that~~ *It* runs east-west with two to three lanes in each direction and left-turn channelization at major intersections throughout the Study Area. Parking is generally not allowed along *this roadway* ~~most of Florence Avenue~~, although some parking is permitted east of La Brea Avenue. The posted speed limit is 35 mph.
- **Hawthorne Boulevard/La Brea Avenue** is a ~~M~~*m*ajor ~~A~~*a*rterial that runs north-south with three to four lanes in each direction plus left-turn channelization at major intersections throughout the Study Area. Parking is generally allowed along most of Hawthorne Boulevard/La Brea Avenue, with some center median parking provided. The posted speed limit is 35 mph.
- **Imperial Highway** is *classified as a Boulevard II arterial roadway* ~~a Class II Major Highway directly south of LAX~~ that runs east-west with two to three lanes in each direction plus left-turn channelization at major intersections throughout the Study Area. Parking is not allowed on Imperial Highway, and the posted speed limit ranges from 40 to 50 mph. Bike lanes currently exist on both sides of Imperial Highway between Vista del Mar and Aviation Boulevard.
- **Inglewood Avenue** is a ~~M~~*m*inor ~~A~~*a*rterial that runs north-south with one to two lanes in each direction plus left-turn channelization at most major intersections throughout the Study Area. Parking is generally allowed on both sides of Inglewood Avenue, and the posted speed limit is 35 mph.
- **Jefferson Boulevard** is *classified as a Boulevard II arterial roadway* ~~a Class II Major Highway~~ that runs east-west with two to three lanes in each direction plus left-turn channelization at most major intersections in the Study Area. With a few exceptions, parking is generally not allowed on either side of Jefferson Boulevard, and the *posted* speed limit ~~ranges from 35 to~~ *is* 45 mph.
- **La Cienega Boulevard** is *classified as a Boulevard II arterial roadway in the City of Los Angeles and a major arterial highway in the City of Inglewood. This roadway* ~~a Class II Major Highway that~~ runs north-south with two to three lanes in each direction plus left-turn channelization at most major intersections in the Study Area. Parking is generally allowed south of La Tijera Boulevard. ~~Between La Tijera Boulevard and Rodeo Road, La Cienega Boulevard is a Class I Major Highway with three lanes in each direction and restricted access; parking is not allowed.~~ The speed limit in the study area ranges from 40 to 55 mph.
- **La Tijera Boulevard** is *classified as a Boulevard II arterial roadway* ~~a Class II Major Highway north of LAX~~ that runs northeast-southwest with two to three lanes in each direction plus left-turn

channelization at major intersections. Parking is allowed on certain segments of La Tijera Boulevard, and it has a posted speed limit of 35 mph.

- **Lincoln Boulevard** is *classified as* a ~~Class I Major Highway northwest of LAX with two to four lanes in each direction plus left-turn channelization at major intersections throughout the Study Area.~~ *Boulevard I (major) arterial roadway that runs in a north-south direction from its southern terminus at Sepulveda Boulevard and extends northerly across several jurisdictions. This roadway generally provides three to four travel lanes in each direction.* ~~It begins at Sepulveda Boulevard just north of LAX and extends to the northwest.~~ Parking is allowed on certain segments of Lincoln Boulevard, and the posted speed limit ranges from 40 to 55 mph. Lincoln Boulevard is State Route 1 in the Study Area. Bike lanes currently exist on both sides of Lincoln Boulevard between Jefferson Boulevard and Loyola Marymount University (LMU) Drive/Bluff Trail Road.
- **Manchester Avenue** is *classified as a Boulevard II arterial roadway in the City of Los Angeles and a major arterial roadway in the City of Inglewood.* ~~a Major Arterial north of LAX that~~ *It* runs east-west~~. It~~ *and* generally has two lanes in each direction plus left-turn channelization at major intersections throughout the Study Area. Parking is allowed along most of Manchester Avenue with some restricted segments. The posted speed limit along Manchester Avenue ranges from 25 to 35 mph. This arterial is known as Manchester Boulevard in the City of Inglewood. Bike lanes currently exist on both sides of Manchester Avenue between Lincoln Boulevard and Sepulveda Boulevard.
- **Nash Street** is a secondary arterial roadway in the City of El Segundo. It runs in a north/south direction with two lanes in each direction plus left-turn channelization at major intersections through the study area. Parking is generally not allowed along this roadway. The posted speed limit is 35 mph. The I-105 Freeway has a westbound off-ramp at Nash Street.
- **National Boulevard** is classified as a secondary arterial roadway in Culver City and as an Avenue II in the City of Los Angeles. It runs in an east-west direction and generally offers two lanes in each direction. On-street parking is available along many stretches of this roadway, generally, except at major intersections where turn lanes are provided. The posted speed limit is 35 miles per hour. National Boulevard provides access to the I-10 Freeway.
- ~~**Nash Street** is a Secondary Arterial that runs north-south with two lanes in each direction plus left turn channelization at major intersections throughout the Study Area. Parking is generally not allowed along Nash Street. The posted speed limit is 35 mph.~~
- **Overland Avenue** is *classified as a Boulevard II in the City of Los Angeles and a primary arterial highway in Culver City.* ~~a Class II Major Highway north of LAX that~~ *It* runs north-south with two lanes in each direction plus left-turn channelization at most major intersections throughout the Study Area. Restricted parking is allowed along most of Overland Avenue, and the posted speed limit is 35 mph.
- **Pershing Drive** is *classified as an Avenue II arterial roadway from its northern terminus at Culver Boulevard to Waterview Street and as a Boulevard II arterial roadway from Waterview Street to its southern terminus at Imperial Highway. Within the Study Area, Pershing Drive provides three to four travel lanes, two lanes in the southbound direction and one to two in the northbound direction.* ~~is a Major Arterial west of LAX that runs north-south with primarily two lanes in each direction plus left-turn channelization at major intersections throughout the Study Area.~~ Parking is allowed on both

sides of Pershing Drive between Westchester Parkway and its northerly terminus at Culver Boulevard. Although parking is prohibited between Imperial Highway and Westchester Parkway, there are bike lanes within these limits. Bike lanes currently exist on both sides of Pershing Drive between Westchester Parkway and Imperial Highway.

- **Prairie Avenue** is a ~~M~~*m*ajor ~~A~~*a*rterial ~~east of LAX~~ that runs north-south *across several jurisdictions. This roadway provides* ~~with~~ three lanes in each direction plus left-turn channelization at most major intersections through the Study Area. Parking is generally allowed along both sides of Prairie Avenue and the posted speed limit is 35 mph.
- **Rosecrans Avenue** is a ~~M~~*m*ajor ~~A~~*a*rterial ~~south of LAX~~ that runs east-west *across several jurisdictions. It provides* ~~with~~ two to three lanes in each direction plus left-turn channelization at most major intersections throughout the Study Area. Parking is not allowed along Rosecrans Avenue within the Study Area, except for limited restricted parking segments. The posted speed limit ranges from 40 to 45 mph.
- **Sawtelle Boulevard** is *classified as a secondary arterial roadway in the City of Culver City and as an Avenue I arterial roadway in the City of Los Angeles. It traverses in a north-south direction and generally provides four travel lanes, two lanes per direction, with turn lanes at major intersections through the Study Area*. ~~a Secondary Highway north of LAX with one to two lanes in each direction.~~ Parking is allowed along most of Sawtelle Boulevard on both sides, and the posted speed limit ranges from 25 to 35 mph.
- **Sepulveda Boulevard** is *classified as a Boulevard I arterial roadway in the City of Los Angeles and as a primary arterial roadway in Culver City. South of Lincoln Boulevard, it is designated as State Route 1 under Caltrans jurisdiction. The roadway generally offers three to four travel lanes in each direction with left-turn lanes at major intersections.* ~~a Class I Major Highway with three to four lanes in each direction plus left-turn channelization at major intersections throughout the Study Area. It runs north-south and intersects with the main entrance and exit of the Airport's CTA at Century Boulevard, providing direct access to LAX. Parking is generally prohibited on both sides of Sepulveda Boulevard, with the exception of the stretch between Manchester Avenue and 92nd Street. North of Ballona Creek, Sepulveda Boulevard has two lanes in each direction plus left-turn channelization at major intersections. Between Sawtelle Boulevard and Green Valley Circle, there are two southbound lanes and two left-turn lanes at major intersections.~~ The *posted* speed limit *along this roadway within the Study Area* ranges from ~~30~~*35* to ~~45~~*40* mph. *Within the Study Area, parking is generally prohibited on both sides of the street except within the Westchester Business District. Sepulveda Boulevard provides one of the primary access/egress options to the LAX CTA and connects to the I-405 Freeway to the south.* ~~Sepulveda Boulevard is State Route 1 south of its intersection with Lincoln Boulevard.~~ Bike lanes currently exist on both sides of Sepulveda Boulevard between Centinela Avenue and Manchester Avenue. *The segment of Sepulveda Boulevard in Culver City offers four to six travel lanes, two to three lanes per direction, with a central left-turn lane, with a posted speed limit of 35 mph. Bike lanes are provided on both sides of the street north of Venice Boulevard. Parking is allowed along many stretches of this roadway.*
- **Slauson Boulevard** is *classified as a primary arterial roadway in Culver City and as a Boulevard II in the City of Los Angeles.* ~~ranges from a Local Street to a Class II Major Highway in the Study Area.~~ It ~~ranges from one to~~ provides three lanes in each direction plus left-turn channelization at major

intersections *within the Study Area*. Parking is *generally not allowed on this roadway.* ~~only allowed on Slauson Boulevard where it is a local street.~~ The posted speed limit ~~ranges from 25 to~~ *is* 40 mph.

- **Venice Boulevard *(SR-187)*** is *classified as a primary arterial highway within the City of Culver City and as a Boulevard II arterial roadway within the City of Los Angeles. It is also designated as State Route 187 under Caltrans jurisdiction. Venice Boulevard offers six travel lanes,* ~~a Class II Major Highway that runs east-west with two to~~ three lanes in each direction, plus left-turn channelization at major intersections in the Study Area. Parking is generally allowed on both sides of Venice Boulevard, and the posted speed limit is 35 mph. Bike lanes currently exist on one or both sides of Venice Boulevard between Pacific Avenue and Crenshaw Boulevard.
- **Vista del Mar** is a *major arterial and a modified Avenue III roadway within the City of Los Angeles.* ~~Class II Major Highway that~~ *This roadway* runs north-south with two lanes in each direction plus left-turn channelization at major intersections in the Study Area. Parking is *not* allowed along this roadway ~~some segments of Vista del Mar~~, and the posted speed limit is ~~45~~ *40* mph.
- **Washington Boulevard** is *classified as a primary arterial roadway within the City of Culver City and a Boulevard II arterial roadway within the City of Los Angeles.* ~~a Class II Major Highway that~~ *Washington Boulevard* runs east-west with two lanes in each direction plus left-turn channelization at major intersections in the Study Area. ~~Restricted p~~*P*arking along Washington Boulevard is generally allowed, and the posted speed limit ~~ranges from 30 to~~ *is* 35 mph. There are bike lanes on Washington Boulevard between Pacific Avenue and Abbot Kinney Boulevard.
- **Westchester Parkway** is a *Boulevard II arterial roadway* ~~Class II Major Highway just north of LAX~~ that runs east-west with two lanes plus bike lanes in each direction. Its limits are Pershing Drive to the west and Airport Boulevard to the east. ~~Except for a short stretch in Westchester Village, p~~*P*arking is *generally* not allowed along Westchester Parkway. The posted speed limit ranges from 30 to 50 mph. *East of Airport Boulevard, this roadway is referred to as Arbor Vitae Street.* There are bike lanes on both sides of Westchester Parkway between Sepulveda Boulevard and Pershing Drive.

7. Table 4.12.2-13: City of Culver City – Significant Impact Criteria on page 4.12-92 of the Draft EIR has been corrected. This significance threshold was used in the analysis in the Draft EIR but was incorrectly listed in Table 4.12.2-13. Please see the following revised table.

**Table 4.12.2-13: City of Culver City – Significant Impact Criteria**

| LEVEL OF SERVICE (LOS) | FINAL VOLUME/CAPACITY (V/C) RATIO | PROJECT-RELATED INCREASE IN V/C |
|---|---|---|
| C | > 0.700 – 0.800 | Equal or greater than 0.050 |
| D | > 0.800 – 0.900 | Equal or greater than 0.040 |
| E or F | > 0.900 | Equal or greater than *0.020*~~0.010~~ |

SOURCE: City of Culver City, Public Works Department, Engineering Division and Community Development Department, Planning Division, *Traffic Study Criteria for the Review of Proposed Development Projects within the City of Culver City*, July 2012.
PREPARED BY: Ricondo and Associates, Inc., July 2016*, as revised February 2017*.

8. The following paragraph is hereby added after the first paragraph on page 4.12-92 of the Draft EIR. This significance threshold was used in the analysis in the Draft EIR but was inadvertently omitted from the discussion on page 4.12-92 of the Draft EIR.

   *Additionally, , per the City of Culver City, development projects outside of Culver City shall use the thresholds for significant impacts of the other jurisdiction(s) when analyzing intersections in Culver City.*

9. The text of the first bullet on page 4.12-92 of the Draft EIR is hereby corrected as follows. This significance threshold was used in the analysis in the Draft EIR but was incorrectly listed on page 4.12-92 of the Draft EIR.

   - ~~The LOS is F, its final V/C ratio is 1.001 or greater, and the project-related increase in V/C is 0.020 or greater.~~ *If the project's traffic results in an intersection level of service change from LOS D or better to LOS E or F; or*

10. The text of the fifth bullet on page 4.12-96 of the Draft EIR is hereby revised as follows:

    - ~~Vicksburg Avenue Demolition~~

11. The text of the thirteenth bullet on page 4.12-96 of the Draft EIR is hereby revised as follows:

    - New Access Roadways to ITF West *to and from W. 98th Street*

12. The text of the second to last bullet on page 4.12-96 of the Draft EIR is hereby revised as follows:

    - W. 98th Street *Eastbound* Underpass *to the CONRAC*

13. The following bullet is hereby added after the fifth bullet (Section 4.12.2.6.2) on page 4.12-98 of the Draft EIR:

    - *Vicksburg Avenue cul-de-sac*

14. Table 4.12.2-16: Intersection Analysis - Baseline (2015) Compared to 2015 With Project (page 3 of 6) on page 4.12-101 of the Draft EIR has been revised. Please see the following revised table.

15. The title of Table 4.12.2-21 on page 4.12-131 of the Draft EIR is hereby revised as follows:

**Table 4.12.2-21: Intersection Level of Service Analysis – ~~2015~~ *2035* With Project**

16. Figure 4.12.2-6: 2035 Future With Project a.m. Peak Hour Intersection Impacts on page 4.12-133 of the Draft EIR is hereby revised to correct the identification of intersection impacts. All impacts were disclosed in the Draft EIR (see Table 4.12.2-20 on page 4.12-125) but were not correctly shown on the figure.

Intersections 63 and 130 were shown with a significant impact, but have been corrected to show a "no improvement." Intersections 95 and 137 were shown with a "no improvement" but have been corrected to show an "improvement." Please see the following revised figure.

17. Figure 4.12.2-7: 2035 Future With Project p.m. Peak Hour Intersection Impacts on page 4.12-135 of the Draft EIR is hereby revised to correct the identification of intersection impacts. All impacts were disclosed in the Draft EIR (see Table 4.12.2-20 on page 4.12-125) but were not correctly shown on the figure. Intersection 147 was shown with a significant impact, but has been corrected to show a "no improvement." Intersections 60, 82, 84, 95, 134, and 146 were shown as "no improvement" but have been corrected to show an "improvement." Intersection 22 was shown as "improvement" but has been corrected to show "no improvement." Please see the following revised figure.

18. The headers for Tables 4.12.2-25, 4.12.2-26, 4.12.2-27, 4.12.2-28, 4.12.2-29, and 4.12.2-30 on pages 4.12-141 through 4.12-152 of the Draft EIR are hereby revised as follows:

| | | | 2015 WITH PROJECT | | | |
|---|---|---|---|---|---|---|
| VOLUME [~~A~~*E*] | DENSITY [C] (PC/MI/LN) | LOS | DEMAND FLOW RATE (D) | D/C [D] | D/C INCREASE | D/C IMPACT F>=0.01 |

19. Segment 23 on Tables 4.12.2-25, 4.12.2-26, 4.12.2-27, 4.12.2-28, 4.12.2-29, and 4.12.2-30 on pages 4.12-142, 4.12-144, 4.12-146, 4.12-148, 4.12-150, 4.12-152, respectively, of the Draft EIR are hereby revised as follows:

| | |
|---|---|
| 23. | SR-90 at Centinela Avenue |
| | ~~I-405 South of Venice Boulevard~~ |

20. The end of Tables 4.12.2-27, 4.12.2-28, 4.12.2-29, and 4.12.2-30 on pages 4.12-146, 4.12-148, 4.12-150, 4.12-152, respectively, of the Draft EIR are hereby revised as follows:

NOTES:

[a] ~~Peak hour volume based on traffic volumes provided by Caltrans.~~ *Model estimated volume data.*

[b] Speed = Average passenger car speed.

[c] Density >45 pc/mi/ln represents oversaturated conditions.

[d] The freeway mainline capacity used in calculation of D/C is 2,000, per Caltrans.

~~[e] Model estimated volume data.~~

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**Table 4.12.2-16: (3 of 6): Intersection Analysis - Baseline (2015) Compared to 2015 With Project**

| | | 2015 BASELINE | | | | | | 2015 WITH PROJECT | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | a.m. | | midday | | p.m. | | a.m. | | midday | | p.m. | | SIGNIFICANT IMPACT? | | |
| # | INTERSECTION | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | a.m. | midday | p.m. |
| 69 | Sepulveda Boulevard and Grand Avenue | 0.820 | D | --- | --- | 0.875 | D | 0.822 | D | --- | --- | 0.879 | D | --- | --- | --- |
| 70 | Sepulveda Boulevard and El Segundo Boulevard [1/] | 0.815 | D | --- | --- | 0.967 | E | 0.817 | D | --- | --- | 0.967 | E | --- | --- | --- |
| 71 | Sepulveda Boulevard and Rosecrans Avenue [1/] | 0.937 | E | --- | --- | 1.001 | F | 0.937 | E | --- | --- | 1.003 | F | --- | --- | --- |
| 72 | SR-90 Westbound Ramps and Slauson Avenue | 0.736 | C | --- | --- | 0.734 | C | 0.735 | C | --- | --- | 0.734 | C | --- | --- | --- |
| 73 | Buckingham Parkway and Slauson Avenue | 0.806 | D | --- | --- | 0.726 | C | 0.803 | D | --- | --- | 0.724 | C | --- | --- | --- |
| 74 | I-405 Southbound Ramps and Howard Hughes Parkway | 0.428 | A | --- | --- | 0.214 | A | 0.424 | A | --- | --- | 0.210 | A | --- | --- | --- |
| 75 | Sepulveda Eastway and Westchester Parkway | 0.407 | A | --- | --- | 0.602 | B | 0.431 | A | --- | --- | 0.617 | B | --- | --- | --- |
| 76 | La Tijera Boulevard and Manchester Avenue | 0.508 | A | 0.524 | A | 0.504 | A | 0.525 | A | 0.541 | A | 0.501 | A | --- | --- | --- |
| 77 | Jenny Avenue and Westchester Parkway | 0.197 | A | 0.232 | A | 0.330 | A | 0.307 | A | 0.334 | A | 0.295 | A | --- | --- | --- |
| 78 | Avion Drive and Century Boulevard | 0.381 | A | 0.320 | A | 0.292 | A | 0.343 | A | 0.248 | A | 0.228 | A | --- | --- | --- |
| 79 | La Tijera Boulevard and Airport Boulevard | 0.442 | A | 0.349 | A | 0.475 | A | 0.472 | A | 0.312 | A | 0.529 | A | --- | --- | --- |
| 80 | Airport Boulevard and Manchester Avenue | 0.573 | A | ~~0.576~~*0.633* | ~~A~~*B* | 0.699 | B | 0.614 | B | 0.526 | A | 0.639 | B | --- | --- | --- |
| 81 | Airport Boulevard and Arbor Vitae Street/Westchester Parkway | 0.661 | B | 0.587 | A | 0.763 | C | 0.630 | B | 0.490 | A | 0.668 | B | --- | --- | --- |
| 82 | Airport Boulevard and 96th Street | 0.279 | A | 0.332 | A | 0.376 | A | 0.333 | A | 0.323 | A | 0.375 | A | --- | --- | --- |
| 83 | Airport Boulevard and 98th Street | 0.374 | A | 0.397 | A | 0.467 | A | 0.507 | A | 0.603 | B | 0.691 | B | --- | --- | --- |
| 84 | Airport Boulevard and Century Boulevard | 0.565 | A | 0.451 | A | 0.459 | A | 0.507 | A | 0.401 | A | 0.483 | A | --- | --- | --- |
| 85 | Nash Street /I-105 Westbound Ramps and Imperial Highway | 0.414 | A | --- | --- | 0.350 | A | 0.403 | A | --- | --- | 0.258 | A | --- | --- | --- |
| 86 | Nash Street and El Segundo Boulevard | 0.551 | A | --- | --- | 0.579 | A | 0.545 | A | --- | --- | 0.560 | A | --- | --- | --- |
| 87 | Douglas Street and Imperial Highway | 0.346 | A | --- | --- | 0.579 | A | 0.349 | A | --- | --- | 0.578 | A | --- | --- | --- |
| 88 | Douglas Street and El Segundo Boulevard | 0.736 | C | --- | --- | 0.854 | D | 0.731 | C | --- | --- | 0.840 | D | --- | --- | --- |
| 89 | I-405 Northbound Ramps and La Tijera Boulevard | 0.804 | D | 0.706 | C | 0.773 | C | 0.756 | C | 0.677 | B | 0.773 | C | --- | --- | --- |
| 90 | I-405 Southbound Ramps and La Tijera Boulevard | 0.740 | C | 0.588 | A | 0.754 | C | 0.738 | C | 0.586 | A | 0.722 | C | --- | --- | --- |
| 91 | Bellanca Avenue and Century Boulevard | 0.471 | A | --- | --- | 0.437 | A | 0.307 | A | --- | --- | 0.269 | A | --- | --- | --- |
| 92 | Aviation Boulevard/Florence Avenue and Manchester Avenue | 0.697 | B | 0.583 | A | 0.629 | B | 0.636 | B | 0.550 | A | 0.538 | A | --- | --- | --- |
| 93 | Aviation Boulevard and Arbor Vitae Street | 0.802 | D | 0.521 | A | 0.720 | C | 0.808 | D | 0.531 | A | 0.800 | C | --- | --- | Yes |
| 94 | Aviation Boulevard and Century Boulevard | 0.730 | C | 0.554 | A | 0.729 | C | 0.640 | B | 0.499 | A | 0.670 | B | --- | --- | --- |
| 95 | Aviation Boulevard and 104th Street | 0.520 | A | 0.388 | A | 0.507 | A | 0.510 | A | 0.402 | A | 0.578 | A | --- | --- | --- |
| 96 | Aviation Boulevard and 111th Street | 0.475 | A | 0.327 | A | 0.459 | A | 0.648 | B | 0.497 | A | 0.634 | B | --- | --- | --- |
| 97 | Aviation Boulevard and Imperial Highway | 0.576 | A | 0.517 | A | 0.736 | C | 0.538 | A | 0.429 | A | 0.759 | C | --- | --- | --- |
| 98 | Aviation Boulevard and West 120th Street | 0.856 | D | --- | --- | 0.728 | C | 0.834 | D | --- | --- | 0.709 | C | --- | --- | --- |
| 99 | Aviation Boulevard and El Segundo Boulevard | 0.863 | D | --- | --- | 0.955 | E | 0.854 | D | --- | --- | 0.949 | E | --- | --- | --- |
| 100 | Aviation Boulevard and Rosecrans Avenue | 0.946 | E | --- | --- | 0.920 | E | 0.943 | E | --- | --- | 0.916 | E | --- | --- | --- |
| 101 | Hindry Avenue and Manchester Boulevard | 0.640 | B | --- | --- | 0.593 | A | 0.658 | B | --- | --- | 0.567 | A | --- | --- | --- |
| 102 | Hindry Avenue and Arbor Vitae Street [2/] | ~~0.000~~ *19.0 s* | C | *13.2*~~14.6~~ s | B | *14.6 s* ~~0.000~~ | B | 0.517 | A | 0.300 | A | 0.398 | A | --- | --- | --- |

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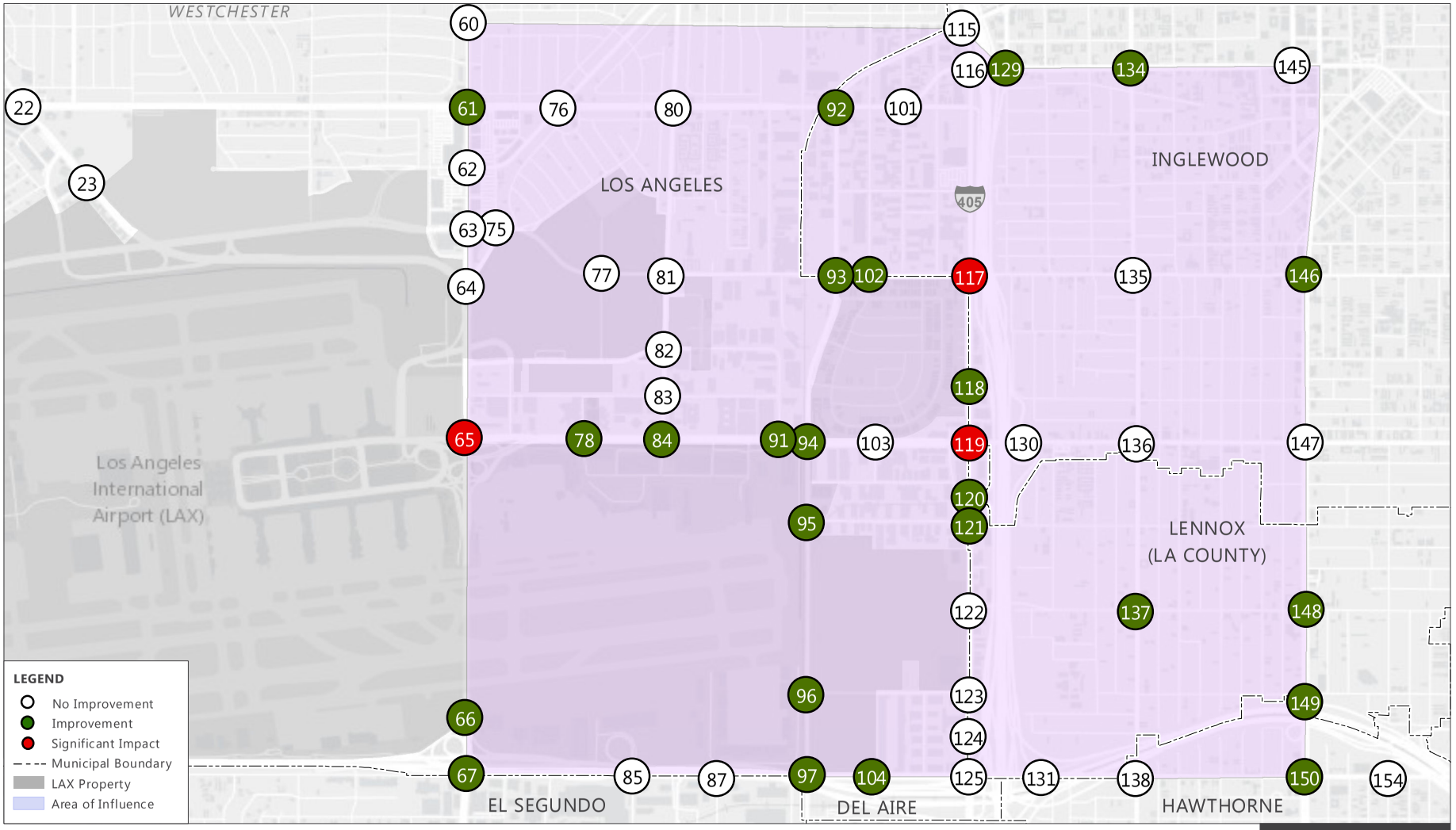


SOURCES: Los Angeles County, 2010, 2011 (city boundary, streets); LAX Airport Layout Plan, Ricondo & Associates, Inc., 2010 (runways, taxiways, terminal area, ariport property boundary); National Geographic World Map, ESRI Database, 2011.
PREPARED BY: Ricondo & Associates, Inc., September 2016.

**FIGURE 4.12.2-6**

## 2035 Future With Project
## a.m. Peak Hour Intersection Impacts

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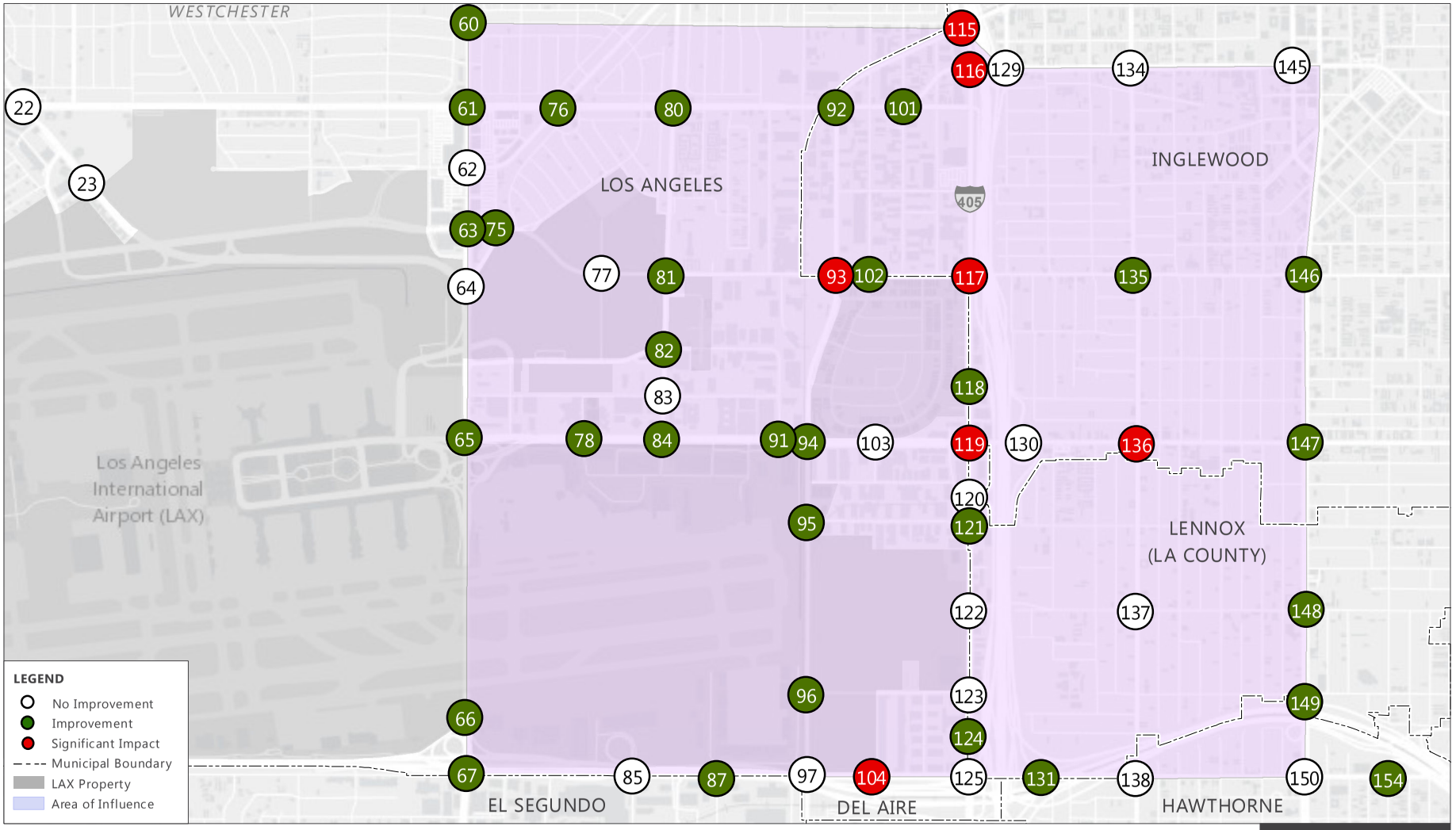


SOURCES: Los Angeles County, 2010, 2011 (city boundary, streets); LAX Airport Layout Plan, Ricondo & Associates, Inc., 2010 (runways, taxiways, terminal area, ariport property boundary); National Geographic World Map, ESRI Database, 2011.
PREPARED BY: Ricondo & Associates, Inc., September 2016.

**FIGURE 4.12.2-7**

2035 Future With Project
p.m. Peak Hour Intersection Impacts

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21. The paragraph under the Transit Analysis heading on page 4.12-153 of the Draft EIR is hereby revised as follow:

~~Given that the Project consists of roadway and transportation improvements and construction of facilities that would facilitate movement at passengers at LAX (aside from potential future related development), the Project would not generate any additional new trips. In fact, the Project would reduce the number of trips on the street system under Baseline (2015) With Project, Future (2024) With Project and Future (2035) With Project conditions. The proposed Project would improve connections to the regional transit system, which may encourage passengers and employees to utilize transit rather than other modes of traffic. Therefore, impacts to transit would be less than significant.~~

*Table TR-1, as included in Chapter 3, Corrections and Additions to the Draft EIR, of the Final EIR summarizes the transit impact analysis associated with all transit routes serving LAX and its vicinity. The table evaluates and summarizes key elements used in transit impact analysis such as the total daily ridership of all transit lines serving LAX and its vicinity, total available capacity of all these transit routes, average daily ridership to capacity ratios and whether residual capacity would be available under the following scenarios - Existing conditions without and with proposed Project, Future (2024) conditions without and with proposed Project and Future (2035) conditions without and with the buildout of the proposed Project.*

*It can be observed from the transit impact analysis table that the existing average daily route ridership of all routes serving LAX and its vicinity is approximately 115,546 riders with residual capacity available throughout the day. With the Proposed Project in place, the average daily ridership is estimated to increase to 117,545 riders; however, there would continue to be adequate capacity available on a daily basis with the proposed Project. The ratios of Average Daily Ridership to Capacity for the without and with Project conditions indicate that the proposed Project would not result in substantial increase in transit demand compared to the capacity of transit lines serving the Project area. Therefore, impacts due to the Project would be less than significant under the Existing plus Project scenario because there would be no substantial increase in transit demand compared to capacity of transit lines serving the Project area.*

*Similarly, the Future (2024) without Project average daily ridership is projected to be 139,093 riders with residual capacity available. With proposed Project in the Future Year 2024, the average daily ridership is projected to increase to 141,235 riders; however, there would continue to be adequate capacity available on a daily basis. The ratios of Average Daily Ridership to Capacity for the without and with Project conditions indicate that the proposed Project would not result in substantial increase in transit demand compared to the capacity of transit lines serving the Project area. Therefore, transit impacts due to Phase 1 of the proposed Project would be less than significant because there would be no substantial increase in transit demand compared to capacity of transit lines serving the Project area.*

*Table TR-1 also presents the Future (2035) without Project average daily ridership to be 151,804 riders with residual capacity throughout the day. With buildout of the proposed Project in 2035, the average daily ridership is projected to increase to 154,310 riders. However, adequate transit capacity would continue to be available even with the overall proposed Project in place. The ratios of Average Daily Ridership to Capacity for the without and with Project conditions indicate that the proposed Project would not result in substantial increase in transit demand compared to the capacity of transit lines serving the Project area and, consequently, no significant transit impacts would occur because there would be no substantial increase in transit demand compared to capacity of transit lines serving the Project area.*

22. Figure 4.12.2-8: 2035 Future With Project and Potential Future Related Development a.m. Peak Hour Intersection Impacts on page 4.12-163 of the Draft EIR is hereby revised to correct the identification of intersection impacts. All impacts were disclosed in the Draft EIR (see Table 4.12.2-31) but were not correctly shown on the figure. Intersections 63 and 130 were shown with a "no improvement", but have been corrected to show a significant impact. Intersections 95 and 137 were shown with an "improvement" but have been corrected to show "no improvement." Please see the following revised figure.

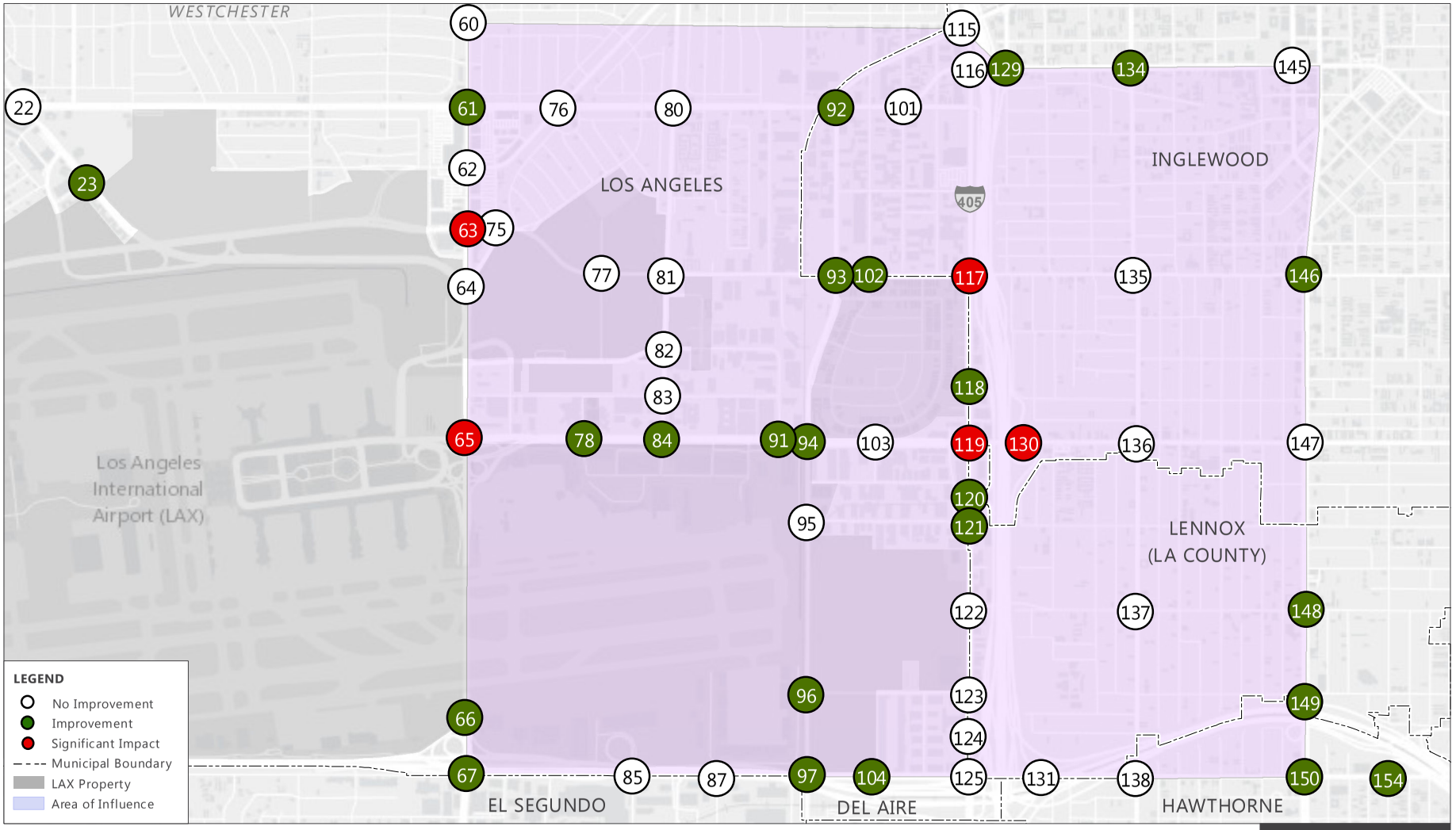
23. Figure 4.12.2-9: 2035 Future With Project and Potential Future Related Development p.m. Peak Hour Intersection Impacts on page 4.12-165 of the Draft EIR is hereby revised to correct the identification of intersection impacts. All impacts were disclosed in the Draft EIR (see Table 4.12.2-31) but were not correctly shown on the figure. Intersection 147 was shown as an "improvement", but has been corrected to show a significant impact. Intersections 60, 82, 84, 95, 134, and 146 were shown as "improvement" but have been corrected to show "no improvement." Please see the following revised figure.

24. The last paragraph under the heading 4.12.2.9 Mitigation Measures on page 4.12-179 of the Draft EIR is hereby revised as follows:

    If any of the mitigation measure(s) below that include improvement(s) in other jurisdictions cannot be implemented for reasons beyond the control of the applicant, ~~fisnificant~~ *significant* impact at those locations would remain.

25. The first paragraph in Mitigation Measure MM-ST (LAMP)-6, Transportation Demand Management Program (TDM), on page 4.12-179 of the Draft EIR is hereby revised as follows:

    **MM-ST (LAMP)-6. Transportation Demand Management (TDM) Program.** Prior to *completion of Phase 1 of the Project*~~the issuance of the Certificate of Occupancy for the CONRAC facility~~, Los Angeles World Airports shall:




SOURCES: Los Angeles County, 2010, 2011 (city boundary, streets); LAX Airport Layout Plan, Ricondo & Associates, Inc., 2010 (runways, taxiways, terminal area, ariport property boundary); National Geographic World Map, ESRI Database, 2011.
PREPARED BY: Ricondo & Associates, Inc., September 2016.

NORTH 0 2,400 ft

**FIGURE 4.12.2-8**

2035 Future With Project and Potential Future Related Development
a.m. Peak Hour Intersection Impacts

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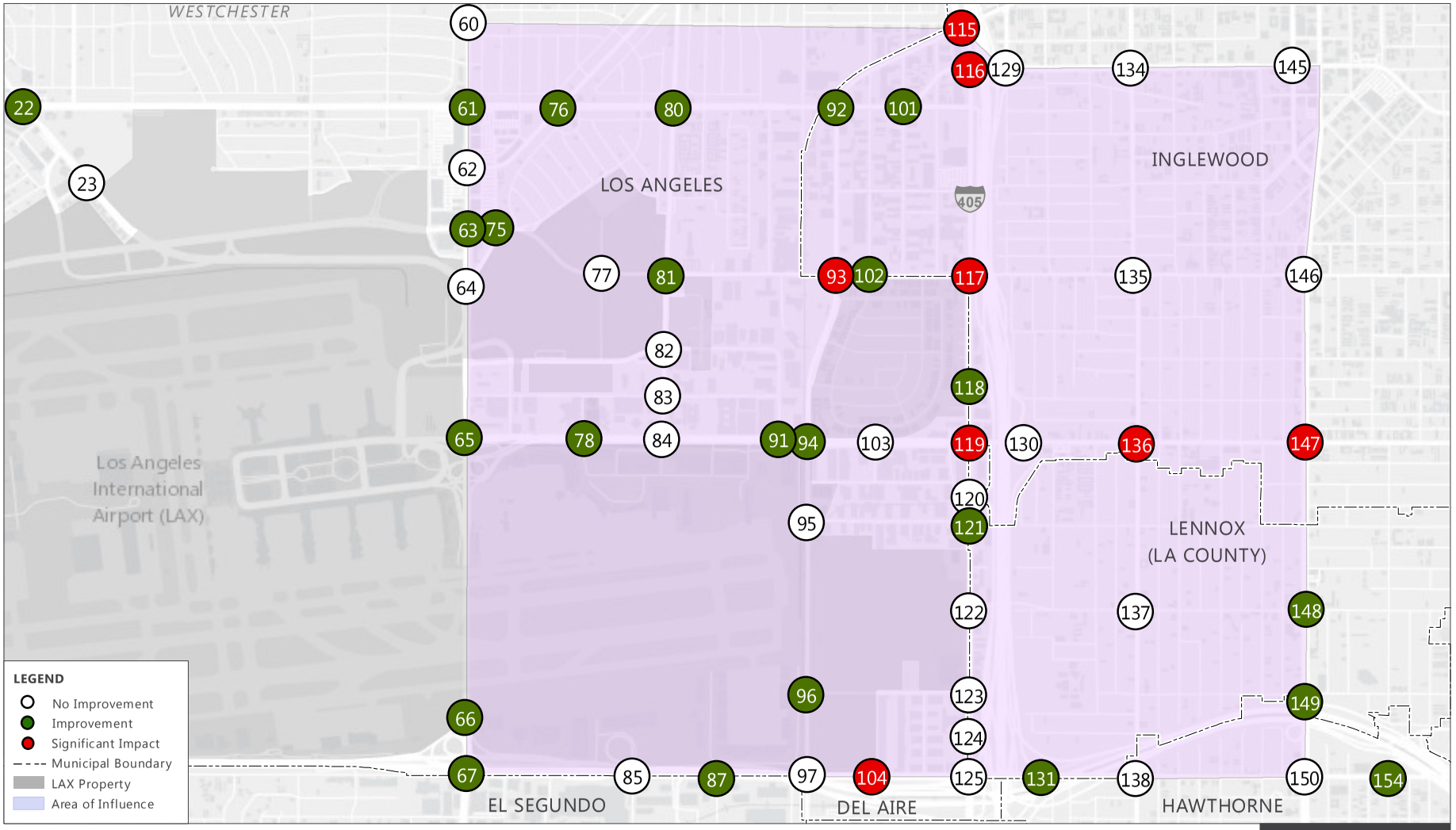


SOURCES: Los Angeles County, 2010, 2011 (city boundary, streets); LAX Airport Layout Plan, Ricondo & Associates, Inc., 2010 (runways, taxiways, terminal area, ariport property boundary); National Geographic World Map, ESRI Database, 2011.
PREPARED BY: Ricondo & Associates, Inc., September 2016.

NORTH 0 2,400 ft

**FIGURE 4.12.2-9**

2035 Future With Project and Potential Future Related Development
p.m. Peak Hour Intersection Impacts

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26. The first paragraph in Mitigation Measure MM-ST (LAMP)-7, Signal System Corridor Improvements – Intelligent Transportation System (ITS), City of Inglewood, on page 4.12-181 of the Draft EIR is hereby revised as follows:

> **MM-ST (LAMP)-7. Signal System Corridor Improvements – Intelligent Transportation System (ITS), City of Inglewood.** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the CONRAC~~, LAWA shall implement intersection improvements designed to reduce the significant impacts of the Project, consisting of signal system and phasing enhancements, including a monetary contribution to design and implementation of an Intelligent Transportation System (ITS) improvement along various key travel corridors within the City of Inglewood. Signal system and phasing enhancements include provision of additional/upgraded equipment and/or providing connections to existing traffic control systems.

27. The first paragraph in Mitigation Measure MM-ST (LAMP)-8, Signal System Corridor Improvements – Closed Circuit TV (CCTV) Camera and Changeable Message Signs (CMS) Installation, on page 4.12-181 of the Draft EIR is hereby revised as follows:

> **MM-ST (LAMP)-8. Signal System Corridor Improvements - Closed Circuit TV (CCTV) Camera and Changeable Message Signs (CMS) Installation.** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the West ITF~~, LAWA shall implement signal system upgrades within the study area by installing CCTV cameras at the locations identified below:

28. Mitigation Measure MM-ST (LAMP)-9, Modify the Intersection of Airport Boulevard and Century Boulevard, on page 4.12-182 of the Draft EIR is hereby revised as follows:

> **MM-ST (LAMP)-9. Modify the Intersection of Airport Boulevard and Century Boulevard.** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the West ITF~~, LAWA will provide a signal modification to include a southbound right-turn overlap arrow, allowing right-turning vehicles to proceed at the same time the eastbound left-turn turn arrow is green. This improvement will require the prohibition of 'U'-turns in the eastbound direction.

29. Mitigation Measure MM-ST (LAMP)-10, Modify the Intersection of Arbor Vitae Street and Concourse Way-Isis Avenue, on page 4.12-182 of the Draft EIR is hereby revised as follows:

> **MM-ST (LAMP)-10. Modify the Intersection of Arbor Vitae Street and Concourse Way-Isis Avenue.** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the CONRAC~~, LAWA will align the extension of Concourse Way to be directly across from Isis Avenue (north of Arbor Vitae Street) and install a traffic signal of the intersection of Isis Avenue/Concourse Way and Arbor Vitae Street. The provision of a traffic signal at this location will allow left-turn movement in and out of Concourse Way, reducing the number of westbound and northbound left-turns at the intersection of Aviation Boulevard and Arbor Vitae Street.

Through movements north and south between Isis Avenue and Concourse Way will not be permitted.

30. Mitigation Measure MM-ST (LAMP)-11, Modify the Intersection of La Cienega Boulevard and Arbor Vitae Street, on page 4.12-183 of the Draft EIR is hereby revised as follows:

**MM-ST (LAMP)-11. Modify the Intersection of La Cienega Boulevard and Arbor Vitae Street.** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the CONRAC~~, LAWA will provide a second eastbound left-turn lane and contribute to design and implementation of signal system improvement. The eastbound approach will be restriped to have one left-turn lane, a shared left-through lane, one through lane and a separate right-turn lane. The signal system improvement will increase the intersection capacity by 10 percent (a 0.10 improvement in V/C ratio).

31. Mitigation Measure MM-ST (LAMP)-12, Modify the Intersection of La Cienega Boulevard and Century Boulevard, on page 4.12-183 of the Draft EIR is hereby revised as follows:

**MM-ST (LAMP)-12. Modify the Intersection of La Cienega Boulevard and Century Boulevard.** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the CONRAC~~, LAWA will restripe this intersection to provide northbound and southbound dual left-turn lanes and provide a separate westbound right-turn lane. The northbound approach will be restriped within existing right-of-way to provide dual left-turn lanes, two through lanes and two right-turn lanes. The southbound approach will be restriped from one left-turn lane, two through lanes and two right-turn lanes to dual-left-turn lanes, two through lanes and one right-turn lane. The existing westbound shared through-right turn lane will be restriped to a right-turn lane only. The westbound approach will have a left-turn lane, three through lanes and a separate right-turn lane. LAWA will also contribute to the design and implementation of signal system improvements to this intersection.

32. Mitigation Measure MM-ST (LAMP)-13, Modify the Intersection of La Cienega Boulevard and Florence Avenue, on page 4.12-183 of the Draft EIR is hereby revised as follows:

**MM-ST (LAMP)-13. Modify the Intersection of La Cienega Boulevard and Florence Avenue.** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the CONRAC~~, LAWA will contribute to design and implementation of signal system improvement. This improvement will increase the intersection capacity by 10 percent (a 0.10 improvement in V/C ratio).

33. Mitigation Measure MM-ST (LAMP)-14, Modify the Intersection of Inglewood Avenue and Century Boulevard, on page 4.12-183 of the Draft EIR is hereby revised as follows:

**MM-ST (LAMP)-14. Modify the Intersection of Inglewood Avenue and Century Boulevard.** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the~~

~~CONRAC~~, LAWA will contribute to design and implementation of signal system improvement. This improvement will increase the intersection capacity by 10 percent (a 0.10 improvement in V/C ratio).

34. Mitigation Measure MM-ST (LAMP)-15, Modify the Intersection of I-105 Freeway Ramps (east of Aviation Boulevard) and Imperial Highway, on page 4.12-183 of the Draft EIR is hereby revised as follows:

**MM-ST (LAMP)-15. Modify the Intersection of I-105 Freeway Ramps (east of Aviation Boulevard) and Imperial Highway.** Prior to the *completion of Phase 1 of the Project*~~issuance of Certificate of Occupancy for the ITF East~~, LAWA will modify the design for the new 'C' Street being proposed between 111th Street and Imperial Highway to provide a separate right-turn lane on the southbound approach to Imperial Highway.

35. Mitigation Measure MM-ST (LAMP)-16, Modify the Intersection of La Cienega Boulevard and Manchester Boulevard, on pages 4.12-183 and 4.12-184 of the Draft EIR included two options. After consultation with the City of Inglewood, the City of Inglewood has indicated that Option 1 is their preferred options to mitigate the impact at the intersection of La Cienega Boulevard and Manchester Avenue. Thus, the Draft EIR is hereby revised as follows:

**MM-ST (LAMP)-16. Modify the Intersection of La Cienega Boulevard and Manchester Boulevard.**

~~Option 1:~~ LAWA will contribute to design and implementation of signal system improvement. This improvement will increase the intersection capacity by 10 percent (a 0.10 improvement in V/C ratio).

~~Option 2: LAWA will construct a separate northbound right-turn lane. In order accommodate the northbound right-turn lane, LAWA will widen the east side of La Cienega Boulevard. The northbound approach will have a left-turn lane, shared left-through lane, a through lane and a separate right-turn lane.~~

36. Mitigation Measure MM-ST (LAMP)-18, Modify the Intersection La Brea Avenue/Hawthorne Boulevard and Century Boulevard, on page 4.12-184 of the Draft EIR is hereby revised as follows:

**MM-ST (LAMP)-18. Modify the Intersection of La Brea Avenue/Hawthorne Boulevard and Century Boulevard.** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the CONRAC~~, LAWA will ~~provide funds to the City of Inglewood that will~~ implement the following: add a second left-turn lane on the eastbound and westbound approaches. In order accommodate the additional left-turn lanes, it would require widening of Century Boulevard. The eastbound and westbound approaches would have dual left-turn lanes, two through lanes and a shared through-right-turn lane. LAWA will also contribute to the design and implementation of signal system improvements at this intersection.

37. Section 4.12.2.9.3 Roadway Corridor Improvements on page 4.12-184 of the Draft EIR is hereby revised as follows:

- ***MM-ST (LAMP)-19.*** **I-405 Northbound Auxiliary Lane.** – Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the CONRAC~~, LAWA will work with Caltrans to fund an added auxiliary lane along northbound I-405 between El Segundo Boulevard on-ramp and the Imperial Highway off-ramp. This improvement would require widening the I-405 northbound roadway between the limits noted above including potentially widening the bridge over 120th Street.
- ***MM-ST (LAMP)-20.*** **Imperial Highway ~~o~~Off-ramp. –** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the CONRAC~~, LAWA will work with Caltrans to fund the widening of the off-ramp to two lanes at the exit from the I-405 northbound lanes and carrying the widening to the ramp junction at Imperial Highway to provide two left-turn lanes and a separate right-turn lane.
- ***MM-ST (LAMP)-21.*** **La Cienega Boulevard Additional Lane. –** Prior to *completion of Phase 1 of the Project*~~issuance of a Certificate of Occupancy for the CONRAC~~, LAWA shall work with the affected jurisdiction(s) to reconstruct the median along certain stretches of La Cienega Boulevard to allow for a third northbound travel lane between Imperial Highway and Century Boulevard during the peak periods, by restricting parking on the east side of the street. The proposed improvement would allow for three through lanes in both directions along La Cienega Boulevard between Imperial Highway and Century Boulevard during the peak time periods.

38. Bulleted text under the heading 4.12.2.9.5 Fair-Share Contributions for Cumulative State Highway/Freeway Impacts on pages 4.12-184 and 4.12-185 of the Draft EIR is hereby revised as follows:

- ***MM-ST (LAMP)-22.*** **I-405 Corridor and Network Connectivity Enhancements.** The Project will fund completion of a project study report and environmental documents as its fair share to Caltrans efforts towards identification, evaluation and implementation of the I-405 corridor mobility and access improvements such as the I-405 southbound collector-distributor roadway improvements between Florence Avenue and Century Boulevard; associated I-405 SB interchange access improvements at La Cienega Boulevard, Manchester Boulevard and Century Boulevard; I-405 northbound access improvements at Imperial Highway, Century Boulevard and La Cienega Boulevard; and the I-105 westbound to I-405 northbound freeway connector enhancement to potentially improve access to the Century Boulevard interchange. These improvements would be planned to operate in conjunction with the ITS improvements along the I-405 and I-105 freeway corridors such that traffic flow experiencing recurrent and non-recurrent congestion can be improved and managed, and safety is enhanced on an overall basis.
- ***MM-ST (LAMP)-23.*** **I-105 Freeway Intelligent Transportation System (ITS) Improvements.** The Project will contribute its fair share to Caltrans efforts towards implementation of Active Traffic Management (ATM) Strategies along the I-105 freeway corridor between I-110 and Sepulveda Boulevard. ATM is a proactive set of strategies to dynamically manage and regulate traffic based on prevailing conditions of recurrent and non-recurrent congestion. These strategies

could include part-time Hard Shoulder Running (HSR) with speed harmonization, queue warning, dynamic corridor adaptive ramp metering, adaptive traffic signal control, ramp meter-arterial signal coordination, dynamic routing, predictive traveler information and dynamic junction control. Two parallel arterials to the I-105 corridor namely El Segundo Boulevard and Imperial Highway would be included as part of the ATM improvements. These ATM strategies would ultimately improve mobility and enhance safety by using real-time data, technology and decision support systems for making performance-driven decisions.

- ***MM-ST (LAMP)-24.*** **I-405 Freeway Intelligent Transportation System (ITS) Improvements.** The Project will contribute its fair share to Caltrans efforts towards implementation of Active Traffic Management (ATM) Strategies along the I-405 freeway corridor between SR 90 (Marina Freeway) and Rosecrans Avenue. These strategies would help dynamically manage and regulate traffic based on prevailing conditions of recurrent and non-recurrent congestion. The strategies could include dynamic speed harmonization, queue warning, dynamic corridor adaptive ramp metering, adaptive traffic signal control, ramp meter-arterial signal coordination, dynamic routing, predictive traveler information and dynamic junction control. Key parallel arterials to the I-405 corridor namely La Cienega Boulevard, Sepulveda Boulevard and Sawtelle Boulevard would be included as part of the ATM improvements. These ATM strategies would ultimately improve mobility and enhance safety by using real-time data, technology and decision support systems for making performance-driven decisions during prevailing congested conditions.

## Section 4.12.3 Construction Surface Transportation

1. Table 4.12.3-5: Construction Projects Concurrent with the Proposed Project Construction Period on page 4.12-220 of the Draft EIR is hereby revised to include additional information on the Secured Area Access Post (SAAP) Project. Subsequent to the Draft EIR, the construction schedule for the Secured Area Access Project (SAAP) was refined. The SAAP project is now anticipated to begin October 2017 and end April 2020, which occurs concurrent with the LAX Landside Access Modernization Program cumulative peak (November 2019). However, upon review of the anticipated SAAP workforce levels, the number of employees and haul truck trips associated with the SAAP project are minimal. Furthermore, based on the anticipated shift time (6:00 AM to 3:30 PM), only a negligible portion of haul truck trips would occur during the AM peak hour (no haul truck trips during the PM peak hour), while no employee trips are estimated to occur during either the AM or PM peak hours. Therefore, it was determined that the revised SAAP construction schedule would have no appreciable effect on the cumulative peak analysis. These changes, as well as a footnote discussing these changes, have been incorporated into Table 4.12.3-5. Please see the following revised table.

2. Table 4.12.3-6: Construction Projects Concurrent with the Proposed Project Construction Period on page 4.12-225 of the Draft EIR of the Draft EIR is hereby revised to include additional information on the Secured Area Access Post (SAAP) Project (see correction above). The revised SAAP construction schedule would have no appreciable effect on the cumulative peak analysis. These changes, as well as a footnote discussing these changes, have been incorporated into Table 4.12.3-5. Please see the following revised table.

**Table 4.12.3-5: Construction Projects Concurrent with the Proposed Project Construction Period**

| PROJECT NO. | CONCURRENT CONSTRUCTION PROJECT | ESTIMATED TOTAL CONSTRUCTION COST (MILLIONS) | START DATE | END DATE | ESTIMATED EMPLOYEE HOURS DURING PROJECTS (TOTAL) |
|---|---|---|---|---|---|
| N/A[1/] | Landside Access Modernization Program (Project) [4/] | $5,500 | Oct-17 | Dec-35 | 13,100,000 |
| 1 | Midfield Satellite Concourse North | $1,098 | Apr-15 | Nov-19 | 5,732,000 |
| 2 | Terminal 1.5 | $750 | Jun-17 | Jul-19 | 1,681,000 |
| 3 | Terminal 1 Improvements | $375 | Aug-14 | Dec-18 | 840,000 |
| 4 | Runway 7R-25L Rehabilitation | $200 | Sep-17 | Dec-18 | 336,000 |
| 5 | West Aircraft Maintenance Area Project | $67.3 | Aug-14 | Jan-18 | 425,000 |
| 6 | Miscellaneous Projects/Improvements | $945.5 | Jan-14 | Jul-20 | 530,000 |
| 7 | LAX Northside Development [2/] | N/A[1/] | Apr-16 | Jun-25 | N/A[1/] |
| 8 | Terminal 3 (T-3) Connector | $175 | Oct-17 | Sep-19 | 393,000 |
| 9 | Metro Crenshaw / LAX Transit Corridor and Station[3/] | $619 | Jan-15 | Jan-24 | 1,040,000 |
| 10 | Airport Security Buildings | $75 | Jan-19 | Jan-21 | 126,000 |
| 11 | South Terminals Improvements | $660 | Nov-11 | Dec-18 | 1,479,000 |
| 12 | Argo Drain Sub-Basin Stormwater Infiltration and Treatment Facility | $7.5 | Mar-17 | Apr-19 | 17,000 |
| 13 | Canine Facility | $10 | Jan-18 | Jan-19 | 23,000 |
| 14 | Secured Area Access Post (SAAP) Project[5/] | $4 | *Oct -17* ~~Mar-18~~ | *Apr-20* ~~Mar-19~~ | 9,000 |
| 15 | Terminals 2 and 3 Modernization Project | $1,400 | Apr-17 | Sep-23 | 3,138,000 |
| 16 | Concourse 0 | $1,500 | Apr-19 | Mar-23 | 3,362,000 |
| 17 | MSC South Project | $1,000 | Jan-20 | Jan-25 | 2,242,000 |
| 18 | Terminal 2 Improvements | $176 | Jan-14 | Jan-18 | 395,000 |
| 19 | North Airfield Improvements | $200 | July-19 | Dec-25 | 336,000 |

NOTES:

1/ N/A = Not Applicable

2/ Construction traffic estimates based on monthly construction activity estimates provided by Gibson Transportation Consulting, Inc. includes Airport Metro Connector/96th Street Transit Station construction traffic.

3/ Estimated budget and schedule based on information obtained from Crenshaw/LAX Transit Corridor Project Final EIR and project website.

4/ Construction traffic estimates provided by Connico Incorporated.

*5/ Subsequent to the Draft EIR, the construction schedule for the Secured Area Access Project (SAAP) was refined. The SAAP project is now anticipated to begin October 2017 and end April 2020, which occurs concurrent with the LAX Landside Access Modernization Program cumulative peak (November 2019). However, upon review of the anticipated SAAP workforce levels, the number of employees and haul truck trips associated with the SAAP project are minimal. Furthermore, based on the anticipated shift time (6:00 AM to 3:30 PM), only a negligible portion of haul truck trips would occur during the AM peak hour (no haul truck trips during the PM peak hour), while no employee trips are estimated to occur during either the AM or PM peak hours. Therefore, it was determined that the revised SAAP construction schedule would have no appreciable effect on the cumulative peak analysis.*

SOURCES: LAWA, CDM Smith. Connico Incorporated, March 2016; Ricondo & Associates, Inc., July 2016; Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Environmental Impact Statement, Chapter 3, Transportation Impacts of the Alignment and Stations, Section 4.15, Construction Impacts, and Chapter 8, Financial Analysis and Comparison of Alternatives (Metro Crenshaw/LAX Transit Corridor cost), August 2011, Available: https://www.metro.net/projects/crenshaw_corridor/crenshaw-feis-feir/ (Metro Crenshaw/LAX Transit Corridor schedule), accessed November 12, 2012.

PREPARED BY: Ricondo & Associates, Inc., August 2016 *(as revised February 2017)*.

**Table 4.12.3-6: a.m. and p.m. Peak Hour Traffic PCEs at Overall Cumulative Peak (November 2019) by Project**

| | CONSTRUCTION TRIPS IN PASSENGER CAR EQUIVALENTS (PCES) | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | AM PEAK HOUR (7:00 A.M. - 8:00 A.M.) | | | | | | PM PEAK HOUR (4:00 P.M. - 5:00 P.M.) | | | | | |
| | EMPLOYEES [2/] | | TRUCKS [3/] | | SHUTTLES [4/] | | EMPLOYEES [2/] | | TRUCKS [3/] | | SHUTTLES [4/] | |
| **PROJECT** | **IN** | **OUT** | **IN** | **OUT** | **IN** | **OUT** | **IN** | **OUT** | **IN** | **OUT** | **IN** | **OUT** |
| Proposed Project (November 2019) [1/, 6/] | -- | -- | 71 | 71 | -- [8/] | -- [8/] | -- | -- | 71 | 71 | -- [8/] | -- [8/] |
| **Other Concurrent Projects in November 2019 [5/ *10/*]** | | | | | | | | | | | | |
| 1. Midfield Satellite Concourse North [6/] | 353 | -- | 92 | 92 | -- [8/] | -- [8/] | 83 | 353 | 92 | 92 | -- [8/] | -- [8/] |
| 6. Miscellaneous Projects/Improvements | 4 | -- | 1 | 1 | -- [8/] | -- [8/] | -- | 4 | 1 | 1 | -- [8/] | -- [8/] |
| 7. LAX Northside Area Development [7/] | 234 | -- | -- | -- | -- [8/] | -- [8/] | -- | 234 | -- | -- | -- [8/] | -- [8/] |
| 9. Metro Crenshaw / LAX Transit Corridor and Station | 25 | -- | 5 | 5 | -- [8/] | -- [8/] | -- | 25 | 5 | 5 | -- [8/] | -- [8/] |
| 10. Airport Security Buildings | 32 | -- | 6 | 6 | -- [8/] | -- [8/] | -- | 32 | 6 | 6 | -- [8/] | -- [8/] |
| 15. Terminals 2 and 3 Modernization Project [9/] | -- | 162 | 15 | 15 | 14 | 14 | -- | -- | 15 | 15 | -- [8/] | -- [8/] |
| 16. Concourse 0 | 380 | -- | 65 | 65 | -- [8/] | -- [8/] | -- | 380 | 65 | 65 | -- [8/] | -- [8/] |
| 19. North Airfield Improvements | 3 | -- | 1 | 1 | -- [8/] | -- [8/] | -- | 3 | 1 | 1 | -- [8/] | -- [8/] |
| **Total for Other Concurrent Projects in November 2019** | **1,031** | **162** | **185** | **185** | **14** | **14** | **83** | **1,031** | **185** | **185** | **-- [8/]** | **-- [8/]** |

NOTES:

1/ Haul truck trips are split between Lot D (31 percent), Lot K (40 percent), and Lot P (29 percent).

2/ An occupancy factor of 1.15 employees per vehicle is included in the employee trip calculations.

3/ Truck trips (i.e., haul trucks, concrete trucks) were converted at a rate of 2.5 PCEs per vehicle.

4/ Employee shuttles were converted at a rate of 2.0 PCEs per vehicle. Shuttle occupancy was assumed to be 30 passengers per vehicle.

5/ The ratio of peak hour trips over total monthly employee construction hours for other concurrent projects was assumed to be equal to that calculated for the proposed Bradley West Project, CUP-RP, West Aircraft Maintenance Area, and MSC (weighted average), unless other project-specific data were available.

6/ Assumed to operate with a double-shift work schedule.

7/ Peak hour trips provided by Gibson Transportation Consulting.

8/ Employee shuttles would not affect public roadways or intersections due to the location of the project construction site and the employee parking areas. In some cases, employee parking would occur in close proximity to the construction site; in other cases, employee shuttles would travel largely or exclusively on on-airport roadways.

9/ Employee estimate is based on 539 construction employees distributed across three shifts. Volumes shown represent employees exiting the employee parking lot after the overnight (late) shift.

*10/ Subsequent to the LAMP Draft EIR, the construction schedule for the Secured Area Access Project (SAAP) was refined. The SAAP project is now anticipated to begin October 2017 and end April 2020, which occurs concurrent with the LAX Landside Access Modernization Program cumulative peak (November 2019). However, upon review of the anticipated SAAP workforce levels, the number of employees and haul truck trips associated with the SAAP project are minimal. Furthermore, based on the anticipated shift time (6:00 AM to 3:30 PM), only a negligible portion of haul truck trips would occur during the AM peak hour (no haul truck trips during the PM peak hour), while no employee trips are estimated to occur during either the AM or PM peak hours. Therefore, it was determined that the revised SAAP construction schedule would have no appreciable effect on the cumulative peak analysis.*

SOURCE: Gibson Transportation Consulting, Inc.; Connico Incorporated, May 2016; Ricondo & Associates, Inc., August 2016.
PREPARED BY: Ricondo & Associates, Inc., August 2016 *(as revised February 2017)*.

3. The first paragraph of Mitigation Measure MM-ST (LAMP)-1 on page 4.12-238 of the Draft EIR is hereby revised to clarify that LAWA will form the Project Task Force, but the provisions of this measure will be carried out by the responsible construction contractor, as follows:

**MM-ST (LAMP)-1. Construction Traffic Project Task Force.** LAWA would establish a Project Task Force specific to the LAX Landside Access Modernization Program ~~to coordinate deliveries, monitor traffic conditions, advise motorists about detours and congested areas, and monitor and enforce delivery times and routes. The Project Task Force could~~ *that may* be comprised of key stakeholders from LAWA, the Coordination and Logistic Management Team (CALM), other City departments, and others as deemed appropriate. This Project Task Force would *provide input into worksite traffic control plans and other*~~review~~ traffic management plans ~~to mitigate traffic impacts on public roadways and the CTA where possible.~~*that are developed for the Project.* The Project Task Force would review the traffic management plans ~~and work plans~~ to ensure *the following topics are considered*:

4. The second paragraph of Mitigation Measure MM-ST (LAMP)-1 on page 4.12-239 of the Draft EIR is hereby revised to clarify that LAWA will form the Project Task Force, but the provisions of this measure will be carried out by the responsible construction contractor, as follows:

   The Project Task Force would *collaborate with the appropriate groups to* develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction. The Task Force would work closely with other LAWA departments, including Public Relations, Planning and Development, and Operations. The Task Force would also ensure that an innovative and effective construction outreach and communication strategy is developed to keep key stakeholders, businesses, and residents notified and informed during construction of the proposed Project.

5. The third paragraph of Mitigation Measure MM-ST (LAMP)-1 on page 4.12-239 of the Draft EIR is hereby revised as follows. The mitigation measure has been clarified that LAWA will form the Project Task Force, but the provisions of this measure will be carried out by the responsible construction contractor:

   Prior to initiation of construction, contractors would be required to complete *a Traffic Management Plan (TMP) with associated Haul Routes, and* Worksite Traffic Control Plans (WTCP), *as well as Temporary Traffic Signal Plans (TTS), and Temporary Street Lighting (TSL) Plans if TTSs and TSLs are needed*. The ~~WTCP~~TMP would include a description of how the contractor will manage all construction-related traffic*, deliveries, shift hours, parking locations, haul routes, and modifications to shuttle system operations, if any*. The WTCP would detail the ~~haul routes,~~ locations for variable message and other signs,~~ construction deliveries, construction employee shift hours and parking locations,~~ any lane striping changes, *any detours,* and traffic signal modifications~~, and shuttle system operations, if any~~. The WTCP, *TTS, TSL, and Haul Routes* would require ~~approval of~~ *input from* the Project Task Force as well as any appropriate agencies and departments. Contractor compliance would be monitored throughout the duration of their contract. LAWA would require contractors to implement and comply with the following ~~WTCP~~*TMP* measures to reduce construction-related traffic impacts associated with projects at LAX, including:

6. The last sentence under the heading Designated Truck Delivery Hours of Mitigation Measure MM-ST (LAMP)-1. Construction Traffic Project Task Force on page 4.12-239 of the Draft EIR is hereby revised as follows:

   Peak Airport traffic periods occur throughout most of the day, therefore, to the extent possible, truck delivery hours shall be limited to overnight hours from 1:00 a.m. to ~~9:00~~ *7:00* a.m.

7. The last sentence of Mitigation Measure MM-ST (LAMP)-3, Worksite Traffic Control Plans, on page 4.12-240 of the Draft EIR is hereby revised as follows:

   The WTCP's shall be reviewed and coordinated with the LAWA Project Task Force 30 days in advance of any restriction or closure*, or with as much notice as technically feasible*.

8. The first paragraph and first bullet of Mitigation Measure MM-ST (LAMP)-5, Traffic Maintenance During Construction, on page 4.12-241 of the Draft EIR are hereby revised as follows:

   **MM-ST (LAMP)-5. Traffic Maintenance During Construction.** The following would be implemented during construction when ~~the Project Task Force and~~ appropriate City departments or local jurisdictions deem necessary:

   - ~~A flagperson shall be placed at the truck entry and exit from the Project site.~~

9. The third bullet of Mitigation Measure MM-ST (LAMP)-5, Traffic Maintenance During Construction, on page 4.12-241 of the Draft EIR is hereby revised as follows:

   - Access shall remain unobstructed**,** *or equivalent alternate access provided* for land uses in proximity to the Project site during construction.

## Chapter 5 Alternatives

1. The text of the second bullet on page 5-1 of the Draft EIR is hereby revised as follows:

   - "…the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the ~~proposed~~ *project* objectives, or would be more costly (15126.6(b)).

2. The second line under the heading **Air Quality** in Table 5-2 on page 5-5 of the Draft EIR is hereby revised as follows:

**Table 5-2: (1 of 2) Significant Impacts of the Potential Future Related Development**

| RESOURCE CATEGORY | POTENTIAL FUTURE RELATED DEVELOPMENT (BEFORE MITIGATION) | MITIGATION INCORPORATED? | POTENTIAL FUTURE RELATED DEVELOPMENT (AFTER MITIGATION) |
|---|---|---|---|
| **Aesthetics** | | | |
| Visual Character | Less than Significant | No | Less than Significant |
| Shading | Less than Significant | No | Less than Significant |
| Light and Glare | Less than Significant | No | Less than Significant |
| | | | |
| **Air Quality** | | | |
| Construction | Significant ($NO_x$) | Yes | Less than Significant |
| Operations | Significant (VOC~~,~~ *and* NOx~~, and $PM_{10}$~~) | Yes | Significant (VOC~~,~~ *and* NOx~~, and $PM_{10}$~~) |

3. The first bullet under the heading Air Quality on page 5-8 of the Draft EIR is hereby revised as follows:

   - Operations-related regional emissions of VOC~~,~~ *and* $NO_X$~~, and $PM_{10}$~~.

4. The following paragraph is hereby added after the second bullet (Section 5.4.1.1.1 Central Terminal Area APM Alignments) on page 5-13 of the Draft EIR:

   *In 2014, LAWA staff conducted an alternatives analysis of the APM alignment[1] examining different vertical and horizontal alignments. Among the horizontal alignment alternatives, an elevated "loop" alignment was evaluated within the CTA. Three options were considered for this alignment, including (1) terminal/airside, (2) World Way, and (3) parking garages. Below is an evaluation of each of these options as they relate to construction and operational feasibility:*

   - ***Terminal/Airside:*** *Construction of an integrated APM guideway and stations within the existing terminals/airfield would be infeasible within the current terminal/airfield configuration/constraints. Reconstruction of each terminal would be tremendously costly and severely impact access to the passenger terminals and aircraft gates during construction. Therefore, due to the severe impact to airport operations, as well as potential economic infeasibility, this alignment option was considered infeasible.*
   - ***World Way:*** *The structural integrity of the existing Upper World Way, could not withstand the loading requirements of the APM. Reconstruction of this roadway to withstand the additional load of an APM would be extremely costly and severely impact access to the passenger terminals during construction. Construction of an elevated APM alignment along Lower World Way would require a construction right-of-way of up to 60 feet, or the equivalent of four lanes of roadway and a sidewalk. After construction, this APM alignment would result in the permanent removal of up to two roadway lanes for the placement of APM support columns. Removal of these lanes would severely impact vehicular access to the passenger terminals within the CTA. Therefore, due to the*

*severe impact to airport operations, as well as potential economic infeasibility. this alignment option was considered infeasible.*

- ***Parking Garages:*** *Construction of this alternative would require substantial structural changes to the existing parking garages within the CTA. During construction of this alternative, the already constrained existing parking capacity within the CTA would decrease by approximately 40 percent during the estimated 4-year construction period.[2] Therefore, because of the substantial demolition required and the temporary reduction in CTA parking, this alignment option was considered infeasible.*

[1] *City of Los Angeles, Los Angeles World Airports, LAX Connected, Board of Airport Commissioners Ground Transportation Workshop, May 5, 2014, Available: http://www.connectinglax.com/files/5.5.14_BOAC.Briefing_LAX.Connected.pdf.*

[2] *City of Los Angeles, Los Angeles World Airports, LAX Connected, Board of Airport Commissioners Ground Transportation Workshop, May 5, 2014, Available: http://www.connectinglax.com/files/5.5.14_BOAC.Briefing_LAX.Connected.pdf.*

5. The first sentence of the third paragraph under the Air Quality heading on page 5-40 of the Draft EIR is hereby revised as follows:

   Nonetheless, as the No Project Alternative would not involve any construction, it would not have the significant unavoidable impact that would occur under the proposed Project with respect to construction-related $PM_{10}$, VOC, ~~$NO_2$~~ and $NO_X$ emissions.

## Chapter 6 Other Environmental Considerations

1. The first bullet under the heading **Air Quality** on page 6-2 of the Draft EIR is hereby revised as follows:

   - Operations-related regional emissions of VOC~~,~~ *and* $NO_X$~~, and $PM_{10}$~~.

2. The third paragraph on page 6-4 of the Draft EIR is hereby revised as follows:

   As indicated in Section 4.13, *Utilities and Service Systems*, proposed Project construction and operational impacts on energy and water use ~~and water use~~ would be less than significant.

3. The third sentence of the second paragraph on page 6-7 of the Draft EIR is hereby revised as follows:

   As further discussed in the Airport Cooperative Research ~~Board~~ *Program* (~~ACRB~~ *ACRP*) Report 98, passengers will consider the following elements in evaluating travel options: air service availability, price, itineraries, flight schedules, airport convenience, airline quality, airport quality, and loyalty programs.

4. The third sentence of the third paragraph on page 6-7 of the Draft EIR is hereby revised as follows:

   As discussed in the ~~ACRB~~ *ACRP* Report 98, airline business models are based on "sophisticated revenue, inventory, and pricing management systems."

5. The last paragraph on page 6-8 of the Draft EIR is hereby revised as follows:

In summary, based on the above analysis, reduced traffic congestion in the CTA associated with the proposed Project would not directly or indirectly induce LAX passenger growth. The proposed Project would not directly or indirectly cause passenger growth, which could occur with or without the proposed Project. Based on FAA guidance and ~~ACRB~~ *ACRP* studies, reduced traffic congestion in the CTA and other enhancements in passenger convenience provided by the proposed Project are not primary consideration in passengers' decisions to travel to, from or through LAX, and how often they travel. Many other primary factors such as airfare prices and flight schedules more directly influence these decisions. In addition, based on ~~ACRB~~ *ACRP* studies, relieving traffic congestion in the CTA would not cause airlines to change their business decisions regarding adding more seats and flights at LAX, and would not directly increase the Airport's capacity for additional passengers.

## Chapter 7 Evaluation of Amendments to the LAX Plan and LAX Specific Plan

1. The second paragraph under the Noise heading on page 7-3 of the Draft EIR is hereby revised as follows:

~~LAWA has committed, as part of the West Aircraft Maintenance Area Project, to restrict high-powered engine run-up testing during nighttime hours; this policy would also be incorporated.~~

2. The first paragraph under the Figure 1 heading on page 7-4 of the Draft EIR is hereby revised as follows:

Figure 1 would be revised to reflect the current boundary of the Airport, as well as any changes to the boundary that may occur as a result of the proposed Project, including any property proposed for acquisition (see Figure 2-52 in Chapter 2, *Description of the Proposed Project*). It is the intent that the LAX Plan boundary include all property owned by LAWA. Amendments to this map would include the addition of: ~~the Belford area;~~ the northwest corner of Manchester Square; parcels located between W. 96th Street and W. 98th Street, east of Vicksburg Avenue; the parcel between W. 98th Street and Century Boulevard, east of Avion Drive; the parcel between W. 98th Street and Century Boulevard, midway between Vicksburg Avenue and Avion Drive; and the parcel north of 111th Street, west of Hindry Avenue. Figure 1 would also be revised to remove a parcel of property currently within the LAX Plan area between W. 96th Street and W. 98th Street, west of Airport Boulevard. *Limits of the Airport Airside and Airport Landside areas depicted on the map would be revised to reflect any changes that may occur under the proposed Project. Figure 1 would also be revised to include the new subarea, "Airport Landside Support." There would be no changes to the LAX Northside or Open Space areas (see Appendix C).*

## Chapter 8 List of Preparers, Parties to Whom Sent, List of References, NOP Comments, List of Acronyms

1. The eighth reference listed on page 8-18 of the Draft EIR is hereby revised as follows:

California Health and Safety Code*, Section* 7050.5.

2. The eleventh reference listed on page 8-38 of the Draft EIR is hereby revised as follows:

U.S. Department of Interior, National Park Service, *National Register Bulletin 16, How to* ~~Guidelines for~~ Complete~~ing~~ *the* National Register Form~~s~~, revised 1997.

3. The following is hereby added after the fifth reference listed on page 8-40 of the Draft EIR:

   *U.S. Environmental Protection Agency. Federal Register vol. 81 No. 142 48350. Available: https://www.federalregister.gov/documents/2016/07/25/2016-17410/clean-data-determination-for-1997-pm25, effective August 24, 2016.*

4. The list of acronyms on page 8-50 of the Draft EIR is hereby revised as follows:

   ~~NQ Not Quantified~~

## 3.3 Corrections and Additions to the Appendices of the Draft EIR

### Appendix B LAX Design Guidelines

1. The LAX Design Guidelines Area Map on Page 1-3 of Appendix B of the Draft EIR has been modified to include pedestrian radii/walking distances from the ITF East and ITF West APM Stations. Please see the following revised figure.

2. Discussion on one additional document has been added to Section 1.5, Relationship to Other Documents, on page 1-7, as follows:

   ***Coastal Transportation Corridor Specific Plan:*** *Regulates phased development of land uses to ensure that transportation infrastructure can accommodate uses, and establishes programs and fees to reduce trips, encourage public transportation, and fund transportation improvements.*

3. Guideline 2 has been modified in Section 2.4.7, Vertical Circulation, on page 2-11, as follows:

   Vertical circulation elements can be differentiated between CTA garages, terminal cores, and all other cores, including APM cores, however they should be consistently designed within a project *and match the newer existing cores*.

4. Guideline 9 has been added to Section 2.5.2, Parking Structures, on page 2-14, as follows:

   *9. For parking structures outside the CTA that allow rooftop parking, appropriate screening or parapet walls should be added to prevent vehicle lights from spilling over to adjacent properties.*

5. Guideline 4 has been added to Section 3.5.3, Crosswalk Ramps, on page 3-11, as follows:

   *4. Design of crosswalk ramps will follow applicable standards.*

6. Guideline 3 has been added to Section 3.5.5., Medians and Median Landscaping, on page 3-12, as follows:

   *3. Design of Medians and Median Landscaping will be developed in conjunction with the Department of Public Works.*

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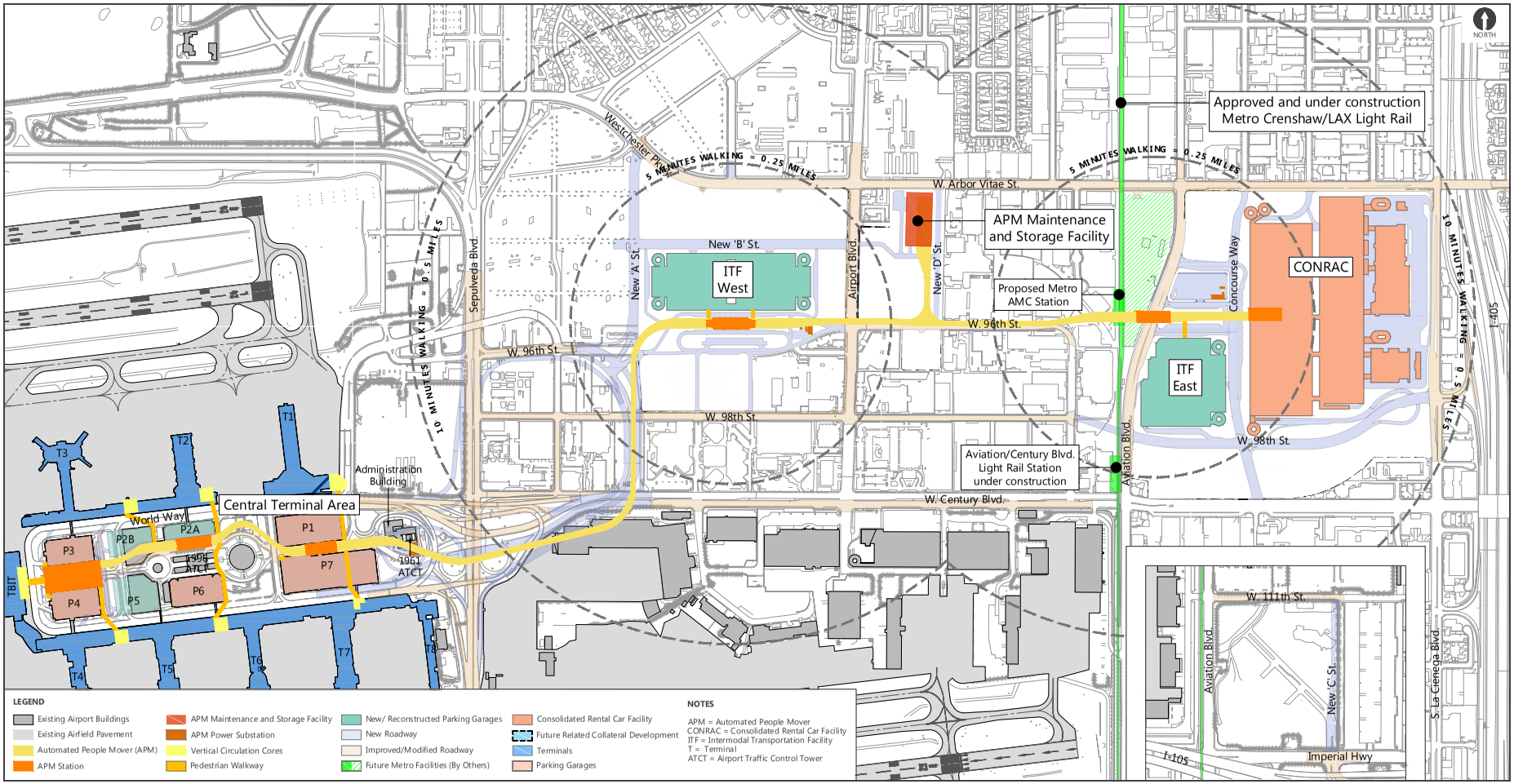


LAX Design Guidelines Area Map

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7. Language has been added to Section 5.1.2 on page 5-2, as follows:

> *The Executive Director shall have the ability to update and/or revise the Design Guidelines from time-to-time to include alternate technologies, new guidelines, or clarify existing provisions. The Executive Director, or his/her designee, has final decision regarding the interpretation of the Design Guidelines.*

## Appendix C LAX Plan Revisions

1. Policy P13 under the Noise heading on page 15 of the LAX Plan included Appendix C of the Draft EIR is hereby revised as follows:

> ~~P.13. Continue to restrict high-powered engine run-up testing during the hours of 2300-0600, unless performed in a GRE.~~

## Appendix D LAX Specific Plan Revisions

1. The text and figures for Appendix D are hereby replaced with the correct revisions to the LAX Specific Plan. Please see the following revised attachment.

2. Section 2, Purposes, on page 2 of the LAX Specific Plan, Item I has been revised. The version contained in Appendix D of the Draft EIR had added the words "through *partnership and* consultation with stakeholders". The added words "*partnership and*" have been removed from the corrected text, as LAWA does not necessarily partner with all stakeholders.

3. Section 3, Relationship to the Los Angeles Municipal Code and Other Ordinances, Item B, More and Less Restrictive Uses, has been revised. The version contained in Appendix D of the Draft EIR had substituted the word "*intensities*" for "densities". The substituted word "*intensities*" has been replaced with the words "*floor areas*", to be consistent with municipal code.

4. Section 5, Definitions, Project, item 15 on page 9 of the LAX Specific Plan has been revised. The revised text in the Draft EIR stated: "Temporary uses of land, including but not limited to: parking; building materials storage; cargo staging; construction staging; and construction offices, modular structures and trailers necessary for project construction." This text has been revised to "Temporary uses of land for a period not to exceed 180 days."

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# LOS ANGELES INTERNATIONAL AIRPORT (LAX)

# Specific Plan

**Ordinance No. 176,345**
**Effective ~~January 20, 2005~~_____**

As amended by Ordinance Nos. 179,148; 182542; ~~and~~ 184348~~.~~; and _____.

## TABLE OF CONTENTS

Ordinance No. _____

An ordinance establishing a Specific Plan, known as the LAX Specific Plan, within the LAX Plan area.

## Section 1. ESTABLISHMENT OF THE LAX SPECIFIC PLAN.

The City Council hereby establishes the LAX Specific Plan (Specific Plan) for the area bounded generally by 88th Street, Manchester Avenue, and 91st Street on the north, Imperial Highway on the south, Pershing Drive on the west, and La Cienega Boulevard on the east (Specific Plan Area), as shown on ~~Map~~ Figure 1.

## ~~Sec.~~ Section 2. PURPOSES.

This Specific Plan is intended to:

~~1~~**A.** Recognize the uniqueness of LAX as a regional economic engine, an international gateway to the Pacific Rim, and an important public amenity;

~~2~~**B.** Provide regulatory controls and incentives for the systematic and incremental execution of the LAX Plan, an element of the General Plan, to provide for public needs, convenience and general welfare as the development of the airport necessitates;

~~3~~**C.** Ensure the orderly development of infrastructure consistent with the intensity and design of the LAX Plan by establishing general procedures for development within the Specific Plan Area;

~~4~~**D.** Promote the development of a regional airport system in Southern California through an improved regional ground access system;

~~5~~**E.** Provide the appropriate zoning regulations for the development of the LAX Plan in conformance with the goals and objectives of other local and regional plans and policies;

~~6~~**F.** Ensure the Los Angeles World Airport's ability to operate LAX safely and efficiently throughout implementation of the LAX Plan;

~~7~~**G.** Recognize the important relationship between LAX and its neighbors and avoid development impacts to the extent practical and feasible;

~~8~~**H.** Protect airport-related and community businesses by providing regulatory controls and incentives consistent with these goals; and

~~9~~**I.** Ensure on-going participation in improvements to LAX by appropriate stakeholders - business, labor, community, airline industry trade groups, and government – through consultation with stakeholders.

## ~~Sec.~~ Section 3. RELATIONSHIP TO THE LOS ANGELES MUNICIPAL CODE AND OTHER ORDINANCES.

**A. Specific Plan Regulations**. The regulations of this Specific Plan are in addition to those set forth in the planning and zoning provisions of the Los Angeles Municipal Code (LAMC), Chapter 1 as amended, and any other relevant ordinances, and do not convey any rights not otherwise granted under the provisions and procedures contained in the LAMC or other ordinances, except as specifically provided in this ordinance.

**B. More and Less Restrictive Uses.** Wherever this Specific Plan contains provisions that establish regulations (including, but not limited to, standards such as floor area~~densities~~, uses, parking, signage, open space and landscape requirements), which are different from, more restrictive or more permissive than would be allowed pursuant to the provisions contained in the LAMC or any other relevant ordinances, this Specific Plan shall prevail and supersede the applicable provisions of the LAMC and those relevant ordinances.

**C. Supersede "T" Tentative and "Q" Qualified Classifications.** This Specific Plan shall supersede any and all "T" Tentative and "Q" Qualified classifications applicable to property within the Specific Plan Area prior to the adoption date of this Specific Plan, including those contained in Ordinance No. 159,526. The substance of the conditions in 159,526 is incorporated in this ordinance in Section ~~11~~ 12 and the attached "LAX Northside Design Guidelines and Standards" and relate to property generally known as LAX Northside.

**D. Site Plan Review and "Major" Development Projects Ordinances.** Notwithstanding LAMC Sections 16.05 and 12.24 U 14, Site Plan Review and "Major" Development Projects approvals shall not be required within this Specific Plan Area.

**E. Specific Plan Procedures.** Notwithstanding LAMC Sections 11.5.7 B, 11.5.7 C, 11.5.7 D, 11.5.7 E, 11.5.7 H, and 11.5.7 J, Project Permit Compliance approvals, including modifications, adjustments and interpretations, shall not be required within this Specific Plan Area.

**F. Mini-Shopping Centers and Commercial Corner Development Ordinance.** Notwithstanding LAMC Sections 12.22 A 23 and 12.24 W 27, Mini-Shopping Center and Commercial Corner Development approvals shall not be required within this Specific Plan Area.

**G. Landscape Ordinance.** The provisions of LAMC Sections 12.21 A 6, 12.40, 12.41, 12.42, and 12.43 shall not apply within the Specific Plan Area.

**H. Hotels.** When Located Within 500 Feet of an A or R Zone. Notwithstanding LAMC Section 12.24 W 24, approvals for hotels located within 500 Feet of an A or R Zone shall not be required within this Specific Plan Area.

**I. Parking.** Where this Specific Plan contains language or standards that require more parking or permit less parking than LAMC Section 12.21 A 4, this Specific Plan shall supersede the

LAMC. In addition, the requirements of Los Angeles Ordinance No. 182,386 shall not be required within this Specific Plan Area.

**J. Telecommunications.** Notwithstanding LAMC Section 12.24 W 49, approvals for Telecommunications Facilities shall not be required within this Specific Plan Area.

**K. Kennels When Located Within 500 Feet of a Residential Zone.** Notwithstanding LAMC Section 12.24 W 25, approvals for kennels or facilities for the boarding of dogs when located within 500 feet of any residential zone shall not be required within this Specific Plan Area.

**L. Citywide Design Guidelines.** Any ordinance amending LAMC Section 11.5.4 to require Projects to comply with the Citywide Design Guidelines shall not apply within this Specific Plan Area.

**M. Sale or Dispensing of Alcoholic Beverages.** Notwithstanding LAMC Sections 12.24 W. 1, 12.24 X.2 approvals for the sale or dispensing or consumption of alcoholic beverages within sterile area of the airport facilities shall be pursuant to Section 16 of this specific plan.

## ~~Sec.~~ Section 4. APPLICATION OF SPECIFIC PLAN TO DEVELOPMENT IN SPECIFIC PLAN AREA.

**A.** Development located in the Airport Airside ~~Sub-Area~~ Subarea, ~~or the~~ Airport Landside ~~Sub-Area~~ Subarea, or the Airport Landside Support Subarea which requires a grading, building, mechanical, electrical, plumbing and/or sign permit, is subject to all of the regulations of this Specific Plan, with the exception of Section ~~11~~ 12 of this Specific Plan. Development located in the Northside ~~Sub-Area~~ Subarea, which requires a grading, building, mechanical, electrical, plumbing and/or sign permit, is subject to all of the regulations of this Specific Plan (including the regulations in Section ~~11~~ 12 of this Specific Plan) and the guidelines and standards in the LAX Northside Design Guidelines and Standards. The provisions of Section 7 apply only to Projects as defined in this Specific Plan.

**B.** No grading permit, building permit, or use of land permit shall be issued, and no construction shall occur, on any Project within the Specific Plan Area unless the Executive Director has approved the proposed development pursuant to the review process set forth in Section 7 of this Specific Plan.

## ~~Sec~~ Section 5. DEFINITIONS.

Whenever the following terms are used in this Specific Plan, with the first letter or letters capitalized, they shall be construed as defined in this section. Words and phrases not defined in this section shall be construed as defined in LAMC Section 12.03.

**Air Cargo Facility.** Buildings, including any associated equipment and vehicles, used for the storage and transport of cargo to and from commercial aircraft.

**Airport.** An area of land that is used or intended to be used for the landing and taking off of aircraft, and includes its buildings, facilities and ancillary uses, if any.

**Airport Airside ~~Sub-Area~~ Subarea.** That area as shown on ~~Map~~ Figure 2.

**Airport Landside ~~Sub-Area~~ Subarea.** That area as shown on ~~Map~~ Figure 2.

**Airport Landside Support Subarea.** That area as shown on Figure 2.

**Applicant.** Any entity, LAWA or any person, as defined in LAMC Section 11.01, submitting a request for LAX Specific Plan Compliance Review.

**Automated People Mover System (APM).** A rail or fixed guideway based transportation system or systems. ~~that moves passengers to and from the Central Terminal Area to the landside access facilities (CONRAC AND ITF) and other mass transportation facilities in an above-grade configuration, and to and from the Central Terminal Area to the Tom Bradley International Terminal and the Midfield Satellite Concourse in a below-grade configuration.~~

**BOAC.** The Board of Airport Commissioners of Los Angeles World Airports.

**Cargo Staging Area (CSA).** A non-enclosed open area within the Airside Subarea where cargo is temporarily stored awaiting shipment.

**Central Terminal Area (CTA).** The primary passenger check-in and processing center and the transition to and from landside facilities ~~(ITF and CONRAC)~~.

**CEQA.** California Environmental Quality Act.

**City Engineer.** The City Engineer of the Department of Public Works, Bureau of Engineering, or his or her designee.

**Commercial Passenger Vehicle Staging and Holding Area.** An area for taxis, rental car company, hotel/motel, door-to-door, and scheduled buses and vans, chartered buses and vans, etc., to wait before picking up passengers.

**Consolidated Rental Car Facility (CONRAC).** A consolidated facility to accommodate rental car operators at LAX. This facility may include a customer service facility, ready/return garage, rental car storage, and maintenance support.

**Director of Planning.** The Director of the City of Los Angeles Department of City Planning, or his or her designee.

**Executive Director.** The Executive Director of Los Angeles World Airports, or his or her designee.

**Federal Aviation Administration (FAA).** A federal agency charged with regulating air commerce to promote its safety and development, encouraging and developing civil aviation, air traffic control and air navigation, and promoting the development of a national system of airports.

**Fixed-Base Operators (FBO).** A person, firm or corporation authorized by issuance of a commercial operator's permit to provide aeronautical activities, services or products at the airport for compensation or hire.

**Fuel Farm.** Facility used for the storage of aircraft jet fuel prior to distribution to the aircraft via hydrant system or fueling trucks.

**Imperial Terminal Area.** The Imperial Terminal Area is the approximately 42.5-acre area north of Imperial Highway between Main Street and California Street, as shown on Figure 2.

**Intermodal Transportation Facility (ITF).** A facility providing remote passenger pick up and drop off areas, public parking, and connections to the APM, public transit and/or other commercial vehicles (i.e. door-to-door shuttles and scheduled buses).

**LADOT.** The City of Los Angeles Department of Transportation.

**LADOT General Manager.** The General Manager of the City of Los Angeles Department of Transportation or his or her designee.

**LAMC.** Los Angeles Municipal Code.

**Landscape Buffer.** A required landscaped buffer as defined in the LAX Northside Design Guidelines and Standards.

**LAWA.** Los Angeles World Airports.

**LAX.** Los Angeles International Airport.

**LAX Design Guidelines.** Guidelines for site, building and landscape design of LAX facilities, development and streetscape within portions of the Airport Airside Subarea, Airport Landside Subarea and Airport Landside Support Subarea.

**LAX Master Plan (Master Plan).** A strategic framework for future improvements at LAX approved in 2004.

~~**LAX Master Plan Stakeholder Liaison.** A person appointed by BOAC to assist the board and other decision-makers in communicating with the stakeholders regarding LAX Master Plan decisions.~~

**LAX Northside.** The development of project(s) that ~~is~~ are to be built out within the LAX Northside ~~Sub-Area~~ Subarea.

**LAX Northside Design Guidelines and Standards**. Design guidelines and standards promulgated by BOAC for the Northside ~~Sub-Area~~ Subarea and subject to review and approval by the Federal Aviation Administration.

~~**LAX Northside Plan Update Mitigation Monitoring and Reporting Program (Northside MMRP).** The program adopted by BOAC and City Council for applying, monitoring and reporting with respect to the LAX Specific Plan LAX Northside Sub-Area's commitments and mitigation measures as future site specific improvements are developed. The Board of Airport Commissioners may modify the program in accordance with CEQA.~~

**LAX Northside ~~Sub-Area~~ Subarea.** That area as shown on ~~Map~~ Figure 2.

**LAX Plan.** The area plan adopted by City Council as the land use element of the City's General Plan for the airport and LAX Northside.

**LAX Specific Plan Compliance Review.** A determination issued pursuant to Section 7 of this Specific Plan.

**Midfield Satellite Concourse (MSC).** A component of the terminal facilities located west of the Central Terminal Area ~~accessed via the Automated People Mover System~~. This component includes uses such as passenger waiting areas, aircraft loading and unloading, retail, and airline operations areas.

**Mitigation Monitoring and Reporting Program (MMRP).** ~~The program adopted by BOAC and City Council for applying, monitoring and reporting with respect to the LAX Plan's master plan commitments and mitigation measures as future site specific improvements and uses contemplated by the LAX Plan are developed. The Board of Airport Commissioners may modify the program in accordance with CEQA.~~ An MMRP is a program to monitor and report on the implementation of mitigation measures adopted at the time a project is approved.

**Navigational Aid (Nav Aid).** Any facility used by an aircraft or its pilot for guiding or controlling flight in the air or the landing or takeoff of an aircraft.

**Non-Sterile Area.** Any portion of the airport accessible by the general public and located before TSA security screening of persons and property. Also referred to as non-secure areas.

**Project.** The construction, erection, addition to, or structural alteration of any building or structure, or use of building or land, or change of use of building or land located in whole or in part within the Specific Plan Area.

*All activity within this Specific Plan is subject to review and is required to comply with the applicable Design Guidelines regardless of whether it meets the definition of a "Project" as defined below:*

A Project shall not include the following:

1. Interior or exterior remodeling of a building;

2. ~~2. The change of use of a building or land, or the relocation of existing uses, if the change of use or relocation (a) changes the footprint of a building or structure by 10% or less in square feet; or (b) increases the usable floor area by 10% or less;~~ The change of use of a building or land, or the relocation of existing uses, if the change of use or relocation changes the usable floor area by 10% or less;

3. Additions to existing structures provided that the addition will not result in an increase of more than: (a) 50% of the floor area of the structures before the addition or 2,500 square feet, whichever is less; or (b) changes the footprint of a building or structure by 10% or less in square feet;

4. ~~3. Activity requiring building permits for the alteration of structures solely relating to mechanical, electrical, or plumbing work internal to the structure, fascia, or any combination of these;~~Repair, installation, extension, and replacement of utilities, electrical power, natural gas, sewage, water, telephone, telecommunications and mechanical systems serving existing facilities, structures or building. Cell towers and rooftop utility work may be subject to the appropriate Design Guidelines;

5. Restoration or rehabilitation of deteriorated or damaged structures, facilities or mechanical equipment and systems to meet current standards of public health, safety, and environmental protection;

6. Repair or in-kind replacement in the existing location of existing streets, sidewalks, gutters, bicycle and pedestrian trails, parking lots (excluding parking structures), aircraft parking areas, and taxiways;

7. New construction, relocation or installation of small facilities, structures, buildings less than 15,000 square feet;

8. ~~4.~~ Signs;

9. ~~5.~~ Fences/walls, retaining walls, ~~or~~ support structures or awnings/canopies;

10. Installation, relocation, and replacement of lighting, security equipment, noise and environmental monitoring systems, or storage tanks;

11. ~~6.~~ The placement of Navigational Aids and any other equipment mandated by the FAA, TSA, or any other governmental agency;

12. ~~7.~~ Improvements mandated by the FAA, TSA, or any other governmental agency;

13. ~~8.~~ Airline operation activities;

14. ~~9. Non-Master Plan Project infrastructure~~ Infrastructure upgrades, airport maintenance activities, and repair of existing facilities approved by BOAC;

15. ~~10.~~ Temporary uses of land for a period not to exceed 180~~120~~ days~~for a period not to exceed 120 days~~;

16. ~~11.~~ Emergency uses and/or activities in response to safety and security issues (i.e., activities required by heightened security levels or unsafe operating conditions);

17. ~~12.~~ Special events, as authorized by the Executive Director or BOAC;

18. ~~13.~~ Notwithstanding LAMC Section 12.23 A 4, the rehabilitation or reconstruction of a conforming or nonconforming building or structure that was damaged or destroyed by fire, flood, wind, earthquake, or other natural or man-made disaster;

19. ~~14.~~ Any construction required in order to comply with an order issued by the U.S. Department of Transportation, the FAA or the Department of Building and Safety to repair or replace an unsafe or substandard condition;

20. ~~15.~~ Construction, the value of which is within the jurisdiction of the Executive Director to approve and does not need to be approved by BOAC under Los Angeles Administrative Code Section 10.1.1 and BOAC Resolution No. 19593 or any subsequent amendment;

21. ~~16.~~ Security, safety and/or utility improvements to existing facilities and/or new security, safety and/or utility facilities;

22. Underground stormwater infiltration systems and facilities in order to comply with State or Federal mandatory environmental requirements or compliance~~.~~;

23. Basic data collection, research, experimental management, and resource evaluation activities such as geologic testing.

**Run-up Enclosure.** Specialty facility used to test aircraft engines and disperse sound to reduce noise impacts on surrounding areas.

**Runway.** A defined rectangular area on the airport used to prepare for the takeoff or landing of aircraft along its length.

**Specific Plan Area.** That area within the heavy dashed lines on Map 1 in this Specific Plan.

**Sterile Area.** Any portion of the airport such as a terminal, concourse or related facility that provides access generally controlled by TSA through security screening of persons and property.

**Taxiway.** A specially designated and prepared surface on an airport, including a taxilane, for aircraft to taxi to and from Runways, hangars, and aircraft parking positions.

**TSA.** Transportation Security Administration, U.S Department of Homeland Security.

**Trip.** A vehicle trip will be administratively defined by agreement between the General Manager of LADOT and LAWA to include the entrance or exit of a vehicle from airport or airport-related property.

## ~~Sec~~ Section 6. SAFETY OF AIRPORT OPERATIONS.

Notwithstanding any other provision of this Specific Plan, no use, development or activity within the Specific Plan Area may compromise the safety of airport flight operations in any way. Final authority for determining whether airport flight operation safety is compromised rests solely with the U.S. Department of Transportation and the FAA.

## ~~Sec~~ Section 7. LAX SPECIFIC PLAN COMPLIANCE REVIEW

**A. General.** The provisions of Subsections B, C, D, E, and H of LAMC Section 11.5.7 do not apply to any Projects proposed for construction within the Specific Plan Area.

**B. Prohibition.** No grading permit, building permit, or use of land permit shall be issued, and no construction shall occur, on any Project within the ~~LAX Northside, Airport Airside and Airport Landside Sub-Areas~~ Airport Airside Subarea, Airport Landside Subarea, Airport Landside Support Subarea and LAX Northside Subarea unless ~~the City Council~~ BOAC grants ~~a~~ an LAX Specific Plan Compliance approval pursuant to the procedures set forth in this section.

**C. Recommendation by Executive Director.** The Executive Director shall have the authority to recommend approval, approval with conditions, modification or denial of a request for an LAX Specific Plan Compliance determination. This recommendation shall be made to BOAC ~~and the City Council~~ pursuant to the procedures set forth in this section~~ after consideration of the traffic generation report and aviation activity analysis required in Subsection G 1 below and following consultation with the LAX Master Plan Stakeholder Liaison~~.

**D. Findings.** The Executive Director shall recommend to BOAC that the proposed Project be granted an LAX Specific Plan Compliance approval upon written findings that the Project satisfies each of the following requirements:

**1. LAX Plan Consistency.** That the Project complies with the LAX Plan, any design guidelines and standards required by the LAX Specific Plan, and all applicable provisions of this Specific Plan; and

**2. Environmental Compliance.** That the environmental effects of the Project ~~has~~ have been ~~adequately analyzed~~ assessed in compliance with CEQA.~~, and the applicable master plan commitments and mitigation measures contained in the MMRP (as may be~~

~~modified by BOAC in accordance with CEQA) or identified in any subsequent environmental review have been incorporated into the Project to the extent feasible.~~

**E. Rights Granted Under LAX Specific Plan Compliance.** The issuance of an LAX Specific Plan Compliance approval indicates compliance with the LAX Plan and this Specific Plan, but does not in any way indicate compliance with other applicable provisions of LAMC Chapter I (Planning and Zoning Code), nor with Chapter IX (Building Code).

**F. Procedures.**

1. The Executive Director shall review a Project for LAX Specific Plan Compliance based upon the following information:

   (a) A written description of the Project including location, size, proposed use, and any other pertinent information;

   (b) A completed initial environmental study, including a traffic study, where appropriate, or other analysis;

   (c) The most recent annual traffic generation report as contained in Appendix A ~~as required in Subsection G-1 below~~; and

   (d) The most recent annual aviation activity analysis as contained in Appendix A ~~as required in Subsection G-1 below~~, except for projects located within the LAX Northside Subarea.

2. Executive Director's Review.

   (a) Upon receipt of a request for review, the Executive Director shall transmit a copy of the written description of the Project and appropriate documents to ~~the LADOT General Manager, the City Engineer,~~ the Councilmember of the district in which the Specific Plan Area is located, the Neighborhood Council of Westchester/Playa del Rey, ~~and the LAX Master Plan Stakeholder Liaison,~~ and post notice of the application on the LAWA website. ~~The LADOT General Manager and the City Engineer shall submit any written comments concerning parking, driveways, access, circulation, and infrastructure improvements to the Executive Director within 15 working days from the date the documents were received, unless the LADOT General Manager and the Executive Director agree more time is necessary. For Projects within the LAX Northside Sub-Area, the Director of Planning shall make a written determination approving or disapproving an LAX Plan Compliance within 75 days from the date the documents are received. If the Director of Planning disapproves a Project, the Project shall be required to seek an amendment, or exception to the Specific Plan pursuant to LAMC Sections 11.5.6 and/or 11.5.7F and G, as appropriate. The Executive Director shall ensure that LAWA communicates with the LAX Master Plan Stakeholder Liaison. The Executive Director shall consider the~~

~~comments and concerns of the stakeholders as early in the process as reasonable.~~

(b) The Executive Director shall determine whether the Project complies with the LAX Plan and all applicable provisions of this Specific Plan.

(c) The Executive Director shall determine whether the environmental ~~clearance~~ process for the Project complies with CEQA.

(d) Director of Planning Consistency Determination for Projects located in the LAX Northside Subarea North of Westchester Parkway and the LAX Landside Support Subarea. For proposed Projects located within the LAX Northside Subarea north of Westchester Parkway and the LAX Landside Support Subarea, the Executive Director shall transmit a copy of the written description of the proposed Project to the Director of Planning. The Director of Planning shall review the proposed Project for consistency with the following LAX Specific Plan Sections: Northside north of Westchester Parkway - Sections 12, 13.C.2, 14.D, and 15A; Landside Support Subarea – Sections 11, 13.C.3 and 14; and shall provide the Executive Director with a written determination within 75 days from the date the documents were received, unless the Director of Planning and the Executive Director agree more time is necessary. The Executive Director shall provide the BOAC with a copy of the Director of Planning's Consistency Determination.

(e) If the Executive Director determines that the Project is consistent with the LAX Plan, all applicable provisions of this Specific Plan and with the requirements of CEQA, the Executive Director shall prepare a written report and transmit this report to BOAC for its action on the LAX Specific Plan Compliance request. This written report shall include findings to support the Executive Director's recommendation, ~~the applicable master plan commitments and mitigation measures~~, the ~~applicable~~ mitigation measures identified in ~~any subsequent~~ applicable environmental review documents, the applicable traffic improvements and right-of-way dedications, ~~and~~ any conditions of approval that shall be imposed on the Project and if applicable, pursuant to Section 7.F.2.(d), the Director of Planning Consistency Determination. As a part of this written report, the Executive Director shall summarize the traffic generation report and aviation activity analysis, if applicable. ~~required in Subsection G-1 below,~~ and any written comments received. ~~the results of the consultation with the LAX Master Plan Stakeholder Liaison. The Executive Director shall also attach the reports submitted by the LADOT General Manager and the City Engineer.~~

(f) If the Executive Director determines that the Project is not consistent with the LAX Plan and all applicable provisions of this Specific Plan, the Executive Director may direct staff to reconsider the Project, analyze or redesign the Project, or recommend that BOAC seek an amendment to the LAX Plan and/or an amendment or exception to the Specific Plan pursuant to LAMC Sections 11.5.6 and/or 11.5.7 F and G, as appropriate.

3. Notice Requirements for BOAC Hearing. After receipt of the Executive Director's report and recommendation, BOAC shall set the matter for hearing. Notice of the time, place, and purpose of the hearing shall be given in the following manner:

   (a) By posting the BOAC meeting agenda in the LAWA offices, on the LAWA website, and on the City of Los Angeles website at least 72 hours prior to the meeting.

   (b) ~~For the CTA, ITF, CONRAC, Midfield Satellite Concourse, and APM (except that portion that connects the CTA with Tom Bradley International Terminal and the Midfield Satellite Concourse) Projects, notice shall also be given by sending written notice by First Class Mail at least 15 days prior to the meeting date to: the Department of City Planning; the Department of Building and Safety; the Councilmember(s) of the district in which the Specific Plan Area is located; LADOT, the Bureau of Engineering; the LAX Master Plan Stakeholder Liaison; the Department of Neighborhood Empowerment; the West Los Angeles Area Planning Commission; the president(s) of local neighborhood councils; the Airlines for America trade association, Airlines Airport Affairs Committee, and any other airline industry trade groups identified by the LAX Master Plan Stakeholder Liaison as stakeholders; the LAX Coastal Chamber of Commerce; and local homeowners groups and interested parties who have filed a written request with LAWA.~~ Notice shall also be given by sending written notice by First Class Mail or email at least 15 days prior to the meeting date to: the Councilmember of the district in which the Specific Plan Area is located, the Neighborhood Council of Westchester/Playa del Rey, owners of all property within and outside of the City that is within 500 feet of the proposed Project, and interested parties who have filed a written request with LAWA for the Project.

~~Recommendation by BOAC. BOAC shall recommend to City Council that it approve, approve with conditions, modify or deny a request for LAX Plan Compliance. BOAC shall make the same findings required to be made by the Executive Director, supported by facts in the record. BOAC shall recommend that all appropriate master plan commitments and mitigation measures, the applicable mitigation measures identified in any subsequent environmental review, and any other requirements are included as a condition of the approval.~~

4. ~~City Council~~ BOAC Determination. BOAC ~~City Council~~ shall approve, approve with conditions, modify or deny a request for LAX Specific Plan Compliance. BOAC ~~The City Council~~ shall make the same findings required to be made by the Executive Director, supported by facts in the record. ~~The City Council~~ BOAC shall ensure that all ~~appropriate master plan commitments and mitigation measures,~~ mitigation measures identified in applicable environmental review documents, ~~the applicable mitigation measures identified in any subsequent environmental review,~~ and any other requirements are included as ~~a~~ conditions of the approval. ~~Except for the Projects referred to as the Intermodal Transportation Facility, Automated People Mover System, and North Runway configuration , If the City Council does not take final action on the application for an LAX~~

~~Plan Compliance determination within 45 days of receipt of the recommendation from BOAC, the recommendation from BOAC shall become the final decision on the application.~~

5. Effective Date of Decision. Unless a City Council Consistency Determination Review is required pursuant to Section 7.F.6 (Consistency Determination Review by City Council), BOAC's decision shall become final at the expiration of the next five meeting days of the City Council during which the Council has convened in regular session, unless, pursuant to Los Angeles City Charter, the action is brought before it or Council waives review of that action.

6. Consistency Determination Review by City Council.

   (a) If the BOAC approves a proposed Project located within the LAX Northside Subarea north of Westchester Parkway or the LAX Landside Support Subarea with a Consistency Determination that is inconsistent with the Director of Planning Consistency Determination for that proposed Project, the Consistency Determination shall be reviewed by the City Council.

   (b) Public Hearing and Notice. Before acting on the Consistency Determination, the City Council shall set the matter for hearing, giving a minimum of 15 days notice to the applicant, the Councilmember of the district in which the Specific Plan Area is located, the Executive Director and the Director of Planning, and interested parties who have requested notice in writing for the Project.

   (c) City Council Consistency Determination. The City Council shall make the same Consistency Determination required to be made by the Director of Planning pursuant to section 7.F.2.(d) above, supported by facts in the record, and indicate why the BOAC Consistency Determination is either approved or disapproved. The City Council shall act upon a Consistency Determination within 90 days after the matter is provided to the City Council for determination. The failure to act within the 90 days shall be deemed City Council concurrence with the BOAC Consistency Determination, and the original action on the matter shall become final. If the City Council determines that the BOAC approved Project is consistent with the applicable provisions of the LAX Specific Plan, the BOAC action shall become final. If the City Council determines the BOAC approved Project is not consistent with the applicable provisions of the LAX Specific Plan, the applicant shall be required to seek an Amendment, Exception, or a Project Permit Adjustment to the Specific Plan pursuant to LAMC Sections 11.5.6 and/or 11.5.7E, F and G, as appropriate.

~~**G. Monitoring and Reporting.**~~

~~**1.** LAWA shall prepare and submit annual reports to BOAC, the Department of City Planning, LADOT and City Council for the following:~~

**(a) Traffic Generation Report.** A traffic report, based on the information required by Section 12 C 1, that identifies the current number of Trips being generated by LAX (inclusive of all three Sub-Areas), the number of Trips anticipated to be generated at the completion of any Master Plan Project(s) in development at the time of the report, the Trips proposed to be generated following the full implementation of the Master Plan as informed by current and Project-based Trip counts, and the number of Trips anticipated to be generated by on-going Master Plan construction activities.

**(b) Aviation Activity Analysis.** An aviation activity analysis that identifies the current number of passengers, volume of air cargo and aircraft operations served at LAX, and the volume of aviation activity anticipated to be served by on-going Master Plan construction activities. In order to monitor that regional aviation system improvements are taking place in a timely manner, LAWA will also compile aviation activity statistics for other airports in the Los Angeles region for monitoring and reporting purposes. Passengers, volume of air cargo and aircraft operations activity at all airports with scheduled passenger or cargo activity in Los Angeles, Orange, Riverside, San Bernardino and Ventura counties will be compiled in coordination with the Southern California Association of Governments (SCAG). The analysis shall also include the proportion of aviation activity served at each airport in the region.

**(c) Mitigation Monitoring and Reporting Program.** A status report on compliance with Master Plan commitments and mitigation measures contained in the Mitigation Monitoring and Reporting Program.

**2.** The first of each annual report required in Subdivision 1 shall be submitted one year following the City Council's approval of the LAX Plan and MMRP, and the last report shall be submitted at the end of the year following completion of any pending Master Plan Project.

**H. Additional Study Requirements.**

1. **Specific Plan Amendment Study.** LAWA shall initiate a Specific Plan Amendment Study with corresponding environmental analysis in compliance with CEQA, in the following two circumstances:

**(a)** If the annual traffic generation report required in Subsection G 1 above, and/or the annual traffic generation report considered together with any Project-specific traffic study, shows that any Master Plan Projects will be generating net new airport peak hour Trips in excess of 8,236 (unless the total Trips for that year are related to construction or phasing impacts).

**(b)** If the annual aviation activity analysis required in Subsection G 1 above forecasts that the annual passengers for that year are anticipated to exceed 78.9 million.

~~**2. LAX Domestic Passenger and Airline Market Survey/Study.** LAWA shall initiate an LAX Domestic Passenger Survey/Study and corresponding Airline Survey/Study, if the annual aviation activity analysis required in Section G 1 above forecasts that the annual passengers for that year are anticipated to exceed 78.9 million.~~

~~**(a) LAX Domestic Passenger Survey and Study.** LAWA shall conduct a survey and study of LAX domestic passengers (those passengers not flying internationally or connecting to international flights) designed to identify, at a minimum, (i) those LAX domestic passengers with origination or destination locations closer to other commercial airports in the region; (ii) why those domestic passengers chose to fly out of, or into, LAX rather than another commercial airport closer to their location of origin or destination; and (iii) what actions, consistent with federal, state and local laws, LAWA could take to encourage those domestic passengers to use an airport closer to their location of origin or destination for domestic flights.~~

~~**(b) Airline Survey and Study.** Upon completion of the LAX Domestic Passenger Survey and Study described in 2(a) above, LAWA shall conduct a survey and study of airlines then serving the Southern California commercial air travel market designed to identify what action(s), consistent with federal, state and local laws, LAWA could take to encourage those airlines to provide increased domestic service at other airports in the region, particularly those owned or operated by LAWA.~~

~~**I. LAX Master Plan Stakeholder Liaison.** The LAX Master Plan Stakeholder Liaison shall communicate with the stakeholders on Master Plan issues. The LAX Master Plan Stakeholder Liaison shall ensure that notice is provided to the stakeholders at the earliest reasonable time of initiation of Projects and any Specific Plan Amendment Study.~~

## ~~Sec. 8 LAND USE~~ Section 8. ZONING & LAND USE.

**A. Zoning.** The LAX zone applies to the entire LAX Specific Plan Area.

~~A~~**B. Designation of ~~Sub-Areas~~ Subareas.** The Specific Plan area is divided into ~~3 Sub-areas~~ 4 land use Subareas, as shown on Map 2. The Subareas ~~Sub-areas~~ are designated as follows: Airport Airside, Airport Landside, Airport Landside Support and LAX Northside. The LAX Northside Subarea has three Districts: LAX Northside Campus District, LAX Northside Center District, and LAX Northside Airport Support District. As shown on Map 3, there are fifteen areas within these three Districts: Areas 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12A East, 12A West, 12B and 13.

~~B~~**C. Unified Development.** For purposes of applying building ordinances and regulations, as well as the regulations of this Specific Plan, to the Airport Airside, ~~and~~ Airport Landside and Airport Landside Support ~~Sub-Areas~~ Subareas, these areas may be treated as a unified development (or unified developments).

1. A unified development shall mean an area or development that

   (a) has a combination of functional linkages, such as pedestrian or vehicular connections; and

   (b) is composed of two or more contiguous parcels or lots of record, except where divided by a public street (or streets).

2. Before applying building ordinances and regulations to any area or development within the Airport Airside, ~~and~~ Airport Landside and Airport Landside Support ~~Sub-Areas~~ Subareas, the Department of Building and Safety shall determine whether or not the area or development is a unified development, or part of a unified development, as defined in this subsection. The following provisions may be applied to any area or development determined to be a unified development:

   (a) Location of Parking Area. Notwithstanding LAMC Section 12.21 A4(g), parking to serve the area or development may be located at any location within the Airport Airside, ~~and~~ Airport Landside and Airport Landside Support ~~Sub-areas~~ Subareas. Further, the provisions of LAMC Section 12.26 E 5 shall not apply;

   (b) Floor Area Ratio (FAR). The total buildable area, which excludes awnings and canopies, of all parcels may be used to determine FAR;

   (c) Building Site. Construction of a building and/or structure may be across common interior property lines;

   (d) Driveways, Entry/Exiting, and Drainage. Driveway access, building entry and exiting, and drainage may be across common interior property lines;

   (e) Fire Resistance and Opening Protection of Exterior Walls. The requirements for fire resistance and opening protection of exterior walls are not applicable to the common interior property lines. The property line abutting public roadways or adjacent to properties outside of the boundaries of the unified development is not a common interior property line;

   (f) Construction and Maintenance. The construction and maintenance of all buildings, structures, and site improvements within each unified development shall be in accordance with all building ordinances and regulations that would otherwise be applicable if the buildings, structures, and improvements were located on or within a single lot.

**D. Temporary Uses for Relocation**. For relocation purposes associated with LAWA projects, certain uses that are are not identified in the permitted uses list or that may be prohibited as

identified in each subarea listed below, shall be permitted on a temporary and case-by-case basis as determined by the Executive Director and subject to CEQA review, if necessary.

~~**C. Yard and Setback Regulations.** Notwithstanding the provisions set forth in the LAMC, no front, side, or rear yards or building setbacks are required in the Airport Airside or Airport Landside Sub-Areas. Landscape buffers shall be consistent with any street frontage and landscape guidelines as may be required by the LAX Plan and adopted by BOAC. These landscape buffers shall not be measured from lot lines, but rather from perimeter roadways or as specified otherwise in any adopted street frontage and landscape guidelines. Development in the LAX Northside Sub-Area shall provide setbacks and landscape buffers as specified in Section 11 and the "LAX Northside Design Guidelines and Standards."~~

## ~~SEC~~ Section 9. AIRPORT AIRSIDE ~~SUB-AREA~~ SUBAREA.

**A. Purpose.** To allow for the safe and efficient operation of airport airfield activities, aircraft are permitted to operate under power in this ~~Sub-Area~~ Subarea, except as prohibited in Subsection D below.

**B. Permitted Uses.** The following uses shall be permitted in the Airport Airside Subarea ~~Sub-Area, also designated as the LAX-A Zone,~~ within the Specific Plan Area, subject to approval by the Executive Director~~:~~.

1. All of the uses permitted in the C2 Zone, as specified in LAMC Section 12.14, including, but not limited to:

    (a) Airline clubs, retail uses, and restaurants;
    (b) Aviation school;
    (c) Establishments for the sale and service of alcoholic beverages for on-site and off-site consumption shall be allowed as permitted by and pursuant to any application procedures set forth in the LAMC and Section 16 of this Specific Plan, as applicable;
    (d) Incidental retail uses – which may include permanent or temporary retail uses and/or kiosks and carts; and
    (e) Surface and structured parking lots (including those at-grade, above-grade, and subterranean).

2. All of the uses permitted in the M2 Zone, as specified in LAMC Section 12.19, including, but not limited to:

    (a) Aircraft under power;
    (b) Airline catering and food preparation;
    (c) Airline maintenance and support, including but not limited to storage, aircraft engine or airframe repair and testing, and aircraft maintenance shops;
    (d) Air Cargo Facilities;

(e) Commercial Passenger Vehicle Staging and Holding Area;
(f) Fixed-Base Operators;
(g) Helicopter operations, including but not limited to helicopter landings and take-offs, helipads, heliports, and helistops;
(h) Navigational Aids and any other equipment mandated by the FAA, TSA, or any other governmental agency;
(i) Run-up Enclosures;
(j) Runways, Taxiways, aircraft parking aprons, and service roads; and
(k) Passenger handling facilities, including but not limited to baggage handling and processing, passenger hold rooms, boarding gates, ticketing, and passenger check-in functions.

3. In addition, the following uses shall be permitted:

(a) Aggregate/asphalt grinding and recycling facility;
(b) Airport police fire arms training facility;
(c) Aircraft rescue, firefighting and training facilities;
(d) Automated People Mover System, its stations and related facilities;
(e) Compressed Natural Gas/Liquified Natural Gas ("CNG/LNG") stations, central utility plant, and other fueling and energy sources;
(f) Fuel Farm;
(g) Hazardous waste storage;
(h) Hydrogen cell;
(i) Oil drilling for remediation purposes only;
(j) Security-related equipment and facilities;
(k) Surface water runoff treatment plant;
(l) Uses customarily incident to any of the above uses, and accessory buildings or uses;
(m) Uses and operations determined to be of a similar nature, or deemed necessary for the safe and efficient operation of the airport, by the Executive Director; ~~and~~
(n) Cargo Staging Area

**C. Prohibited Uses.** The following uses shall be prohibited within~~ the LAX-A Zone: Any building containing dwelling units.~~ the Airport Airside Subarea: ~~Any building containing dwelling units.~~

Any building containing dwelling units.

**D. Imperial Terminal Area.** The Imperial Terminal Area is the approximately 42.5-acre area north of Imperial Highway between Main Street and California Street, as shown on ~~Map~~ Figure 2. In this area, aircraft maneuvering may be conducted by tug and tow procedures. The use regulations, for both permitted and prohibited uses, specified in this section for the LAX-A Zone shall apply, except the following uses shall be prohibited:

1. Aircraft under power; and
2. Helicopter operations, including but not limited to helicopter landings and take-offs, helipads, heliports, and helistops.

**E. Building Heights.** All Projects within the Airport Airside Subarea shall be permitted a maximum building height subject to FAA height regulations and restrictions.

**F. Setbacks.** Notwithstanding the provisions set forth in the LAMC, no front, side, or rear yards or building setbacks are required in the Airport Airside Subarea. Landscape buffers shall be consistent with any street frontage and landscape guidelines. These landscape buffers shall not be measured from lot lines, but rather from perimeter roadways.

## ~~Sec~~ Section 10. AIRPORT LANDSIDE ~~SUB-AREA~~ SUBAREA.

**A. Purpose**. To allow for the safe and efficient operation of airport facilities, the primary function of which is to provide access to the airport and process passengers. Aircraft are not permitted to operate under power in this ~~Sub-Area~~ Subarea.

**B. Permitted Uses.** The following uses shall be permitted in the Airport Landside ~~Sub- Area~~ Subarea~~, also designated as the LAX-L Zone,~~ within the Specific Plan Area, subject to approval by the Executive Director~~:~~.

1. All of the uses permitted in the C2 Zone, as specified in LAMC Section 12.14, including, but not limited to:

    (a) Airline clubs, retail uses, and restaurants;
    (b) Aviation school;
    (c) Establishments for the sale and service of alcoholic beverages for on-site and off-site consumption shall be allowed as permitted by and pursuant to any applicable procedures set forth in the LAMC and Section 16 of this Specific Plan, as applicable;
    (d) Rental car operations, including but not limited to vehicle maintenance and car washing;
    (e) Incidental retail uses - permanent or temporary retail uses, which may include kiosks and carts; and
    (f) Surface and structured parking lots (including those at-grade, above-grade, and subterranean).

2. All of the uses permitted in the M2 Zone, as specified in LAMC Section 12.19, including, but not limited to:

(a) Airline catering and food preparation;
(b) Airline maintenance and support, including but not limited to storage, aircraft engine or airframe repair and testing, and aircraft maintenance shops;
(c) Air Cargo Facilities;
(d) Commercial Passenger Vehicle Staging and Holding Area;
(e) Helicopter operations, including but not limited to helicopter landings and take-offs, helipads, heliports, and helistops;
(f) Navigational Aids and any other equipment mandated by the FAA, TSA, or any other governmental agency;
(g) Passenger handling facilities, including but not limited to baggage handling and processing, passenger holdrooms, boarding gates, ticketing; and
(h) Service roads.

3. In addition, the following uses shall be permitted:

(a) Passenger pick up and drop off areas;
(b) Automated People Mover System, its stations and related facilities;
(c) CNG/LNG stations, central utility plant, and other fueling and energy sources;
(d) Security-related equipment and facilities;
(e) Uses customarily incident to any of the above uses, and accessory buildings and uses;
(f) Uses and operations determined to be of a similar nature, or deemed necessary for the safe and efficient operation of the airport, by the Executive Director~~; and~~

**C. Prohibited Uses.** The following uses shall be prohibited within ~~the LAX-L-Zone~~ the Airport Landside Subarea:

1. ~~(a)~~ Aircraft under power; and
2. ~~(b)~~ Any building containing dwelling units.

**D. Building Heights.** All Projects within the Airport Landside Subarea shall be permitted a maximum building height subject to FAA height regulations and restrictions.

**E. Setbacks.** Notwithstanding the provisions set forth in the LAMC, no front, side, or rear yards or building setbacks are required in the Airport Landside Subarea. The location of new buildings and structures, landscape buffers and streetscape design shall conform to the LAX Design Guidelines.

**F. Parking Requirements.**

1. Projects located in the LAX Landside subarea are not required to provide on-site or off-site automobile parking to encourage the use of shared public parking structures planned in this Subarea.

## Section 11. AIRPORT LANDSIDE SUPPORT SUBAREA

**A. Purpose.** To support the Airport regional ground transportation network and to allow for the development of commercial uses meeting the needs of passengers, visitors and employees of LAX, guests of hotels and employees of businesses in or around the Specific Plan Area.

**B. Permitted Uses.** The following uses shall be permitted in the Airport Landside Support Subarea, within the Specific Plan Area, subject to approval by the Executive Director.

1. All of the uses permitted in the C2 Zone, as specified in LAMC Section 12.14, including, but not limited to:

    (a) Retail uses and restaurants;
    (b) Establishments for the sale and service of alcoholic beverages for on-site and off-site consumption shall be allowed as permitted by and pursuant to any applicable procedures set forth in the LAMC;
    (c) Entertainment uses;
    (d) Hotels;
    (e) Offices; and
    (f) Construction staging and laydown area.

**C. Prohibited Uses.** The following uses shall be prohibited within the Airport Landside Support Subarea:

1. Aircraft under power; and
2. Any building containing dwelling units.

**D. Building Heights.** All Projects within the Airport Landside Support Subarea shall be permitted a maximum building height subject to FAA height regulations and restrictions.

**E. Setbacks.** Notwithstanding the provisions set forth in the LAMC, no front, side, or rear yards or building setbacks are required in the Airport Landside Support Subarea. The location of new buildings and structures, landscape buffers and streetscape design shall conform to the LAX Design Guidelines.

**F. Development Standards.** The Airport Landside Support Subarea is divided into two areas. Area 1 contains parcels located in proximity to Aviation Boulevard and Century Boulevard; Area 2 contains parcels located in proximity to Airport Boulevard.

1. The total floor area of all development within the Airport Landside Support Subarea shall not exceed 900,000 square feet.

2. The total floor area within Area 1 shall not exceed 600,000 square feet and the maximum allowable Floor Area Ratio (FAR) for a lot shall be 2.0.

3. The total floor area within Area 2 shall not exceed 600,000 square feet and the maximum allowable Floor Area Ratio (FAR) for a lot shall be 2.0.

**G. Parking Requirements.**

1. Projects located in the Airport Landside Support Subarea are not required to provide on-site or off-site automobile parking to encourage the use of adjacent shared public parking structures.

## ~~Sec 11. LAX NORTHSIDE SUBAREA.~~ Section 12. LAX NORTHSIDE SUBAREA

**A. Purpose.** To provide for the redevelopment of land previously used for residential purposes with uses that are consistent with airport needs and neighborhood conditions. This ~~Sub-Area~~ Subarea serves as an airport buffer zone for the Westchester community.

**B. Districts.** The LAX Northside ~~Sub-Area~~ Subarea has three Districts (the LAX Northside Campus District, LAX Northside Center District, and LAX Northside Airport Support District) and fifteen areas within these Districts - Areas 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12A East, 12A West, 12B and 13 - as shown on ~~Map~~ Figure 3.

**C. Relationship to Section 7 and the LAMC.** The provisions of Section 7 of this Specific Plan shall replace the Project Permit compliance provisions in LAMC Section 11.5.7., however, requests for a Project Permit Adjustments or Exceptions from Specific Plans shall comply with LAMC Section 11.5.7 E and F, as appropriate.

**D. Modification Procedures.** The LAX Northside ~~Sub-Area~~ Subarea is guided by the LAX Northside Design Guidelines and Standards, as may be amended by BOAC from time to time. ~~Los Angeles World Airports (~~LAWA~~)~~ shall notify the Department of City Planning, the Council Office and local Neighborhood Council(s) at least 45 days prior to the proposed BOAC Board Meeting for which changes to the LAX Northside Design Guidelines and Standards ~~is agendized~~ will be considered.

**E. Permitted Uses.** The following land use categories shall be permitted in the LAX Northside ~~Sub-Area~~ Subarea~~, also designated as the LAX-N Zone,~~ within the Specific Plan Area, subject to approval by the Executive Director. For a more detailed list of permitted uses for each land use category, see the “LAX Northside Design Guidelines and Standards”.

1. Recreation and Open Space;
2. Office, Research and Development;
3. Community and Civic;
4. Commercial;

5. Airport Support;
6. Landscape Buffer; and
7. Uses permitted by and pursuant to the procedures set forth in LAMC Section 12.24W.

**F. Prohibited Uses.** The following uses shall be prohibited in the LAX Northside ~~Sub-Area~~ Subarea~~, also designated as the LAX-N Zone~~:

1. Residential, or dwelling units of any kind, except hotels;
2. K-12 education;
3. A retail store over 100,000 gross square feet of floor area;
4. Auto dealerships;
5. Adult business as defined in LAMC 12.70;
6. Parking as a primary use, except in the Airport Support and Mixed Use-Commercial permitted use categories;
7. Hazardous materials testing; and
8. Aircraft under power.

**G. Site Development Standards.** Land uses, setbacks, building orientation, heights, and floor area shall comply with the Site Development Standards contained in Table 1, Section ~~11~~ 12 of this Specific Plan, and the LAX Northside Design Guidelines and Standards.

1. **Total Floor Area Permitted.** The Total Floor area of all development within the LAX Northside Sub- Area shall not exceed 2,320,000 square feet.

2. **Intensity Allocation.** The total floor area within the LAX Northside District shall not exceed the following:
    1. 1,075,000 sf of Floor Area for Campus District (Areas 1, 2 and 3)
    2. 645,000 sf of Floor Area for Center District (Areas 11, 12A East, 12A West, 12B and 13)
    3. 600,000 sf of Floor Area for Airport Support District (Areas 4 - 10)

3. **Undeveloped Parcels**. At the time any District reaches the maximum allowable floor area permitted, any undeveloped parcels shall be landscaped and maintained pursuant to Section 7 of the LAX Northside Design Guidelines and Standards.

**H. LAX Northside Subarea Zone Development Standards Table.** Table 1 summarizes the LAX Northside Subarea development standards for permitted land uses, height, and net new Floor Area.

**Table 1**
**LAX Northside ~~Sub-Area~~Subarea Development Standards**

| District (Areas) | Permitted Land Use Category[a] | Maximum Height from Grade[b] | Net New Floor Area |
|---|---|---|---|

| | | | |
|---|---|---|---|
| LAX Northside Campus District (Area 1, 2, 3) | Open Space and Recreation<br>Community and Civic<br>Buffer<br>Office, Research and Development | 60’ | 1,075,000 |
| LAX Northside Center District (Area 11, 12A East, 12A West, 12B, 13) | Mixed Use-Commercial<br>Community and Civic<br>Open Space and Recreation | 60’ | 645,000 |
| LAX Northside Airport Support District (Area 4, 5, 6, 7, 8, 9, 10) | Airport Support | 30’ | 600,000 |
| **Total** | | | **2,320,000 sf** |

Footnotes:

(a) For a more detailed list of permitted uses, see the “LAX Northside Design Guidelines and Standards.”

(b) For additional height restrictions, see the “LAX Northside Design Guidelines and Standards.”

**I~~H~~. Transfer and Equivalency Program.** Transfers of floor area between all Areas within a District are permitted per the Land Use Equivalency Matrix of the “LAX Northside Design Guidelines and Standards”, however, transfers between LAX Northside Districts are prohibited.

1. ~~(a)~~ All land uses within a District may be exchanged, so long as the proposed use is permitted by this Specific Plan.

2. ~~(b)~~ Floor Area within a District may be exchanged, so long as the proposed use and the maximum allowable Floor Area are permitted by this Specific Plan.

3. ~~(c)~~ Requests for Transfer or Equivalency Exchange shall be indicated in the application for LAX Plan Compliance Review Approval with the Executive Director.

**J~~I~~. Setbacks.** Setbacks in the LAX Northside Subarea ~~Sub-Area~~ are measured from the LAX Northside Subarea ~~Sub-Area~~ or Right-of-Way, regardless of internal parcels or lot lines. Setbacks apply to buildings and ancillary structures and shall comply with the standards in the LAX Northside Design Guidelines and Standards.

**K~~J~~. Building Orientation.** Building orientation shall comply with the standards in the “LAX Northside Design Guidelines and Standards”.

**L. Parking Requirements.** All Projects within the LAX Northside Subarea shall provide off-street parking per LAMC 12.21.A.4.

## ~~Sec 13.~~ SECTION 13. TRANSPORTATION REGULATIONS AND STREETSCAPE.

~~**1. Right-of-Way Dedications.**~~

~~**1.** Right-of-way dedications, or any similar grant of rights to use land for public street purposes, shall be made for any public streets to the satisfaction of the LADOT General Manager and the City Engineer. All dedications shall be in conformance with City of Los Angeles standard street dimensions, unless deemed unwarranted by the LADOT General Manager and the City Engineer based on any environmental review and/or traffic analyses. The LADOT General Manager and the City Engineer may also allow variations from dedications to standard street dimensions if the variation is necessary to assure proper integration of a dedication into existing on-site conditions. The following public roadways within the Specific Plan Area are designated as major or secondary highways:~~

~~**(a)** 96th Street;~~
~~**(b)** 111th Street;~~
~~**(c)** Airport Boulevard;~~
~~**(d)** Aviation Boulevard;~~
~~**(e)** Bellanca Avenue;~~
~~**(f)** Century Boulevard;~~
~~**(g)** Falmouth Avenue;~~
~~**(h)** Imperial Highway;~~
~~**(i)** La Cienega Boulevard;~~
~~**(j)** La Tijera Boulevard;~~
~~**(k)** Lincoln Boulevard;~~
~~**(l)** Pershing Drive;~~
~~**(m)** Sepulveda Boulevard; and~~
~~**(n)** Westchester Parkway/Arbor Vitae Street.~~

**A.** ~~**2.**~~ The use of airspace above a public street shall be permitted so long as the surface elements of that street may be maintained for street purposes.

**B.** ~~**3.**~~ Any roadway within the Airport Airside, ~~and~~ Airport Landside and Airport Landside Support Subareas ~~Sub-Areas~~, which is not already designated as a public street, may be designated as an internal airport roadway. The LADOT General Manager's authority in the design of these roadways shall be advisory only, except that the intersection of these roadways with public streets shall be to the satisfaction of the LADOT General Manager and the City Engineer. Maintenance of internal airport roadways shall be the responsibility of LAWA.

~~**B. Required Traffic Improvements - Airport Airside and Airport Landside Sub-Areas Only.** A transportation improvements phasing plan shall be prepared by LAWA and approved by the LADOT General Manager that is in conformance with the LAX Plan and the certified Master Plan Final Environmental Impact Statement/Environmental Impact Report, and includes all on-site and off-site improvements as required by the LADOT General Manager. Revisions may be made to the transportation improvements phasing plan in conformance with any~~

~~subsequent environmental review, or where appropriate, as determined by the LADOT General Manager.~~

~~Transportation improvements shall be constructed or suitably guaranteed to the satisfaction of the LADOT General Manager and the City Engineer in connection with individual Projects or development sites as specified in the transportation improvements phasing plan. Prior to the issuance of any final certificate of occupancy in the final phase of the transportation improvements phasing plan, all required improvements in the entire phasing plan shall be funded, completed, or resolved to the satisfaction of the LADOT General Manager. If a proposed traffic mitigation measure does not receive the required approval, a substitute mitigation measure may be provided subject to approval by the LADOT General Manager, or other governing agency with jurisdiction over the mitigation location, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the Project's significant traffic impact.~~

**C. ~~Project~~ Trip Generation.**

**1.** In an effort to monitor traffic impacts and traffic mitigation measures, LADOT and LAWA shall jointly conduct traffic counts or otherwise determine the traffic impacts of Projects identified in the ~~within the~~ Master Plan. The conclusions of these counts and other determinations shall be incorporated into a traffic generation report, which shall be approved by the LADOT General Manager and annually submitted to BOAC, City Council, and the Department of City Planning.

The Master Plan FEIS/EIR forecasts the net new Trips from Projects identified at full build out of the Master Plan, after implementation of mitigation measures, to be no more than 8,236 trips at airport peak hour. If the annual traffic generation report described ~~above~~ in Appendix A of this Specific Plan, and/or the annual traffic generation report considered together with any Project-specific traffic study for a project identified in the Master Plan, shows that development of the projects identified in the Master Plan is likely to increase the Trips beyond 8,236, LAWA shall complete ~~the Specific Plan Amendment Study required in Section 7 H of this Specific Plan.~~a Study to identify and recommend additional trip reduction program measures and LAWA shall include in future annual reports an analysis of the on-going effectiveness of those measures.

No ~~Specific Plan Amendment~~ Study shall be required if the annual traffic generation report, and/or the annual traffic generation report considered together with any Master Plan Project-specific traffic study, determines that the net new Trips are anticipated to exceed 8,236 in the airport peak hour, but this increase in Trips will only be temporary until the Project(s) and associated mitigation measures are complete and/or if this increase in Trips is consistent with the number of Trips anticipated to occur during the peak year of traffic impacts as analyzed in the Master Plan FEIS/EIR. In this case, the traffic generation report shall evaluate the effectiveness of future Projects and mitigation measures in ultimately reducing the number of net new Trips to 8,236 in the airport peak hour at buildout of the Master Plan. Any LAX Plan Compliance approval for a Project shall include any conditions necessary to ensure the ultimate reduction. If Trip reduction program measures

are recommended, LAWA shall include in future annual reports an analysis of the on-going effectiveness of those measures and, if the Trip reductions are not effectuated, additional measures may be implemented. ~~and/or a Specific Plan Amendment Study may be triggered.~~

**2. LAX Northside ~~Sub-Area~~ Subarea.** As part of the annual traffic generation report, the number of Trips generated by each project shall be documented so that the total number of Trips generated by on-going development is monitored and reviewed by the LADOT General Manager and the Executive Director for consistency with the maximum allowable number of a.m. and p.m. peak Trips. LADOT and LAWA shall agree on procedures for this documentation. These counts shall be taken at the expense of the Applicant.

A reduction in the total number of Trips permitted to be generated by development in the LAX Northside ~~Sub-Area~~ Subarea, from that which was approved for this area under previous entitlements is required as a result of the LAX Plan and shall be imposed by way of this Specific Plan.

All projects within the LAX Northside ~~Sub-Area~~ Subarea together shall not generate more than 2,009 project-related Trips in the a.m. peak hour (part of the total 6,496 net new a.m. peak hour Trips for the LAX Master Plan) and 2,543 project-related Trips in the p.m. peak hour (part of the total 6,914 net new p.m. peak hour Trips for the LAX Master Plan). The number of Trips generated by a project shall be based on the trip generation rates used in Ordinance No. 168,999 (Coastal Transportation Corridor Specific Plan, as amended (CTCSP)) and/or determined as appropriate by the LADOT General Manager and on square footages of the proposed project. In conjunction with each application for LAX Specific Plan Compliance for a Project within the LAX Northside ~~Sub-Area~~ Subarea, the Applicant shall estimate the number of Trips generated by each Project and submit the estimate to the LADOT General Manager for review and approval. This subsection shall not apply to development within Area 13 as shown on ~~Map~~ Figure 3.

**3. LAX Landside Support Subarea.** Projects in the Landside Support Area are not subject to the limitation in Trips defined in this section.

**D. Automated People Mover System (APM).** APM(s) shall be optimally designed and constructed to minimize disruption and vehicle delay on the public roadway and transit system, and shall be elevated above street level wherever possible to minimize at-grade crossing points with public roadways. LAWA shall consult with the LADOT General Manager and the City Engineer early in the design process of the APM.

Any rules and regulations of the Public Utilities Commission of the State of California governing the APM, including but not limited to its design, operation, and maintenance, shall supersede any other provision of this Specific Plan and any building or zoning ordinances to the contrary.

**E. Streetscape.** All projects shall comply with any adopted Streetscape Plan as applicable.

~~**Sec. 13. PARKING REGULATIONS.**~~

~~**A. Requirements- Airport Airside and Airport Landside Sub-Areas Only.**~~

~~**1.** It is anticipated that approximately 32,155 off-street parking spaces may be provided at build out of the LAX Master Plan, however, notwithstanding LAMC Section 12.21 A 4, no more than 35,712 off-street parking spaces shall be provided at build-out of the LAX Master Plan for passengers, visitors, and airport and airline employees. Parking shall be comprised of short-term, long-term, and employee parking spaces.~~

~~**2.** Notwithstanding LAMC Section 12.21 A 4 (g), parking may be located at any location within the Airport Airside and Airport Landside Sub-Areas.~~

~~**3.** Subsections 1 and 2 above shall not apply to off-street parking for visitors and employees of cargo-only facilities and commercial/industrial buildings located within the area bounded by Century Boulevard, Aviation Boulevard, Imperial Highway and Sepulveda Boulevard, and the area west of Sepulveda Boulevard and north of Imperial Highway. Off-street parking for these cargo-only facilities and commercial/industrial buildings shall be provided in compliance with the provisions of LAMC Section 12.21.A.4(c). The Executive Director may also permit two or more of these uses to share off-street parking spaces, if the Executive Director determines that a lower total number of parking spaces than would otherwise be required will provide adequate parking for these uses.~~

~~**B. Requirements - LAX Northside Sub-Area Only.** All projects within the LAX Northside Sub-Area shall provide off-street parking per LAMC 12.21.A.4.~~

## ~~Sec 14.~~ Section 14. SIGN REGULATIONS.

**A. General Requirements.** The Department of Building and Safety shall issue sign permits for any signs otherwise requiring a permit pursuant to Article 6, Chapter IX of the LAMC that are regulated by this Specific Plan. All signs and sign support structures that are erected and maintained on property owned or controlled, in whole or in part, by LAWA shall be reviewed by the Department of Building and Safety pursuant to LAMC Sections 14.4.1, 14.4.2, 14.4.3, 14.4.4 A - 14.4.4 I, 14.4.11 C - 14.4.11. E, 14.4.12 F,14.4.15, 14.4.16A, 14.4.16 C, 14.4.16 E, 14.4.18 H, 14.4.181, 14.4.19, 91.6201.2.1, 91.6201.3, 91.6202, 91.6204, 91.6205, 91.6205.18, 91.6207, 91.6209, 91.6210, 91.6211, 91.6212, 91.6213, and 91.6216. The Executive Director shall review signs for conformance with all other sign provisions of Article 4.4, Chapter 1 and Article 1, Division 62 of Chapter IX of the LAMC and provide a written approval to the Department of Building and Safety prior to issuance of any sign permit. Types of signs identified in this Specific Plan are defined in LAMC Section 14.4.2. Where materials for signs are not specified in the LAMC, materials shall be approved by the Departments of Building and Safety and Fire.

Except for Subsections D and E, the provisions of this Section shall apply only to signs within the Airport Airside and Airport Landside ~~Sub-Areas~~ Subareas.

**B. Area, ~~location~~ Location, Spacing and Height and Review Procedure.** Signs shall not be subject to the LAX Specific Plan Compliance Review procedure, but shall be reviewed and approved by the Executive Director prior to issuance of any permit for, or installation of, a sign or sign support structure.

Prior to approving any sign, the Executive Director shall determine if the proposed sign is in conformance with the sign guidelines adopted by BOAC. If the adopted guidelines address area, spacing, location, and height of signs, the Executive Director may only approve a sign if it is consistent with those guidelines. If the guidelines do not address area, spacing, location, and height of signs, then the Executive Director may only approve signs that are consistent with the appropriate area, spacing, location, and height regulations in Article 4.4, Chapter I of the LAMC.

Prior to approving any sign, the Executive Director, after consultation with LADOT, shall also determine that the sign is not a hazard to traffic nor will it result in unsafe freeway exposure.

**C. Off-Site, Supergraphic, Digital Display and Mural Signs.** Alteration, redesign or replacement of existing off-site signs, or erection, construction or installation of new off-site signs, supergraphic signs, and mural signs shall be permitted pursuant to the establishment of a sign district as set forth in LAMC Section 13.11. This Specific Plan supersedes LAMC Section 13.11 B to the extent that Section 13.11 B limits Sign Districts to the C, M or R5 Zones. The LAX Sign District regulates an area of the LAX Specific Plan that includes the LAX Central Terminal Area and the area along Sepulveda Boulevard known as the Park One Property, and existing passenger boarding bridges located in the Airport Airside Subarea east of Taxiway R and surrounding the Central Terminal Area. Refer to the LAX Sign District Ordinance No. 183737 for signage requirements in the LAX Sign District.

**D. Requirements - LAX Northside ~~Sub-Area~~ Subarea Only.** Signs within the LAX Northside ~~Sub-Area~~ Subarea shall be in compliance with the requirements set forth in the "LAX Northside ~~Plan~~ Design Guidelines and Standards."

**E. State and Federally Required Signage.** Any signs or sign restrictions mandated by the FAA, TSA, or any other State or Federal regulatory agency shall supersede any other provision of this Specific Plan to the contrary.

## Section 15. Design Guidelines and Standards

**A. LAX Northside Design Guidelines and Standards.** Projects in the LAX Northside Subarea shall substantially conform to the LAX Northside Design Guidelines and Standards and shall take precedence where there is a conflict with any Citywide design guidelines.

**B. LAX Design Guidelines.** The LAX Design Guidelines establish LAWA's comprehensive vision for the passenger experience at LAX. Projects located in the LAX Design Guidelines area, as shown on the map in the LAX Design Guidelines, shall substantially conform to the LAX Design Guidelines as approved by BOAC and shall take precedence where there is a conflict with any Citywide design guidelines.

**C. Amendments.** Both the LAX Northside Design Guidelines and Standards and LAX Design Guidelines may be amended by BOAC from time to time. LAWA shall notify the Department of City Planning, the Council Office and local Neighborhood Council(s) at least 45 days prior to the proposed BOAC Board Meeting at which changes to the LAX Northside Design Guidelines and Standards will be considered.

## Section 16. Alcohol Use Authorizations

The sale and service of alcoholic beverages for consumption may be authorized by the Executive Director in sterile areas only. Entities authorized to sell and serve alcoholic beverages for on-site and off-site consumption shall also obtain licenses or permits from the State Department of Alcoholic Beverage Control (ABC).

Procedures.

A. The Executive Director shall have the authority to approve or deny a request for an Authorization for the sale and consumption of alcoholic beverages.

B. The Executive Director and/or their designee, shall review a request for authorization based on the submittal of a complete Authorization for the Sale of Alcohol form or application;

    1. Upon receipt of a request, the Executive Director shall determine whether the request complies with the provisions of this Specific Plan.

    2. If the Executive Director determines that the request is consistent with all applicable provisions of this Specific Plan, the Executive Director will prepare and issue a letter of authorization.

C. **Non-Sterile Areas.** Requests for Alcohol in non-sterile areas shall be subject to Department of City Planning Conditional Use permit and processes under LAMC Section 12.24.

D. **Conditions.** The following operating Conditions shall be applicable to all alcohol use authorizations issued by the Executive Director.

    **i. Operating Conditions.**

    1. The authorized use shall be conducted at all times with due regard for the character of surrounding facility operations.

    2. The hours of alcoholic beverage sales and dispensing shall be determined by the State of California ABC.

3. All operators, managers and employees serving and/or selling alcohol to patrons shall enroll in and complete a certified, ABC-recognized, training program, such as the Los Angeles Police Department's "Standardized Training for Alcohol Retailers" (STAR) program, for the responsible service of alcohol. This training shall be scheduled for new employees within 6 months of opening of the establishment or within 60 days after the start of employment, whichever applies. A record of the completion of this training program shall be maintained on the premises and shall be submitted to LAWA as evidence of compliance. In addition, a record of the completion of this training program shall be presented to LAWA or ABC upon request.

## ~~Sec. 15.~~ Section 17. SEVERABILITY.

If any provision of this Specific Plan or its application to any person or circumstance is held to be unconstitutional or otherwise invalid by any court of competent jurisdiction, the invalidity shall not affect other Specific Plan provisions, clauses or applications, which can be implemented without the invalid provision, clause or application, and to this end the provisions and clauses of this Specific Plan are declared to be severable.

## ~~Sec. 16.~~ Section 18. CERTIFICATION AND SIGNATURE PAGE.

The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

# Appendix A: Monitoring and Reporting

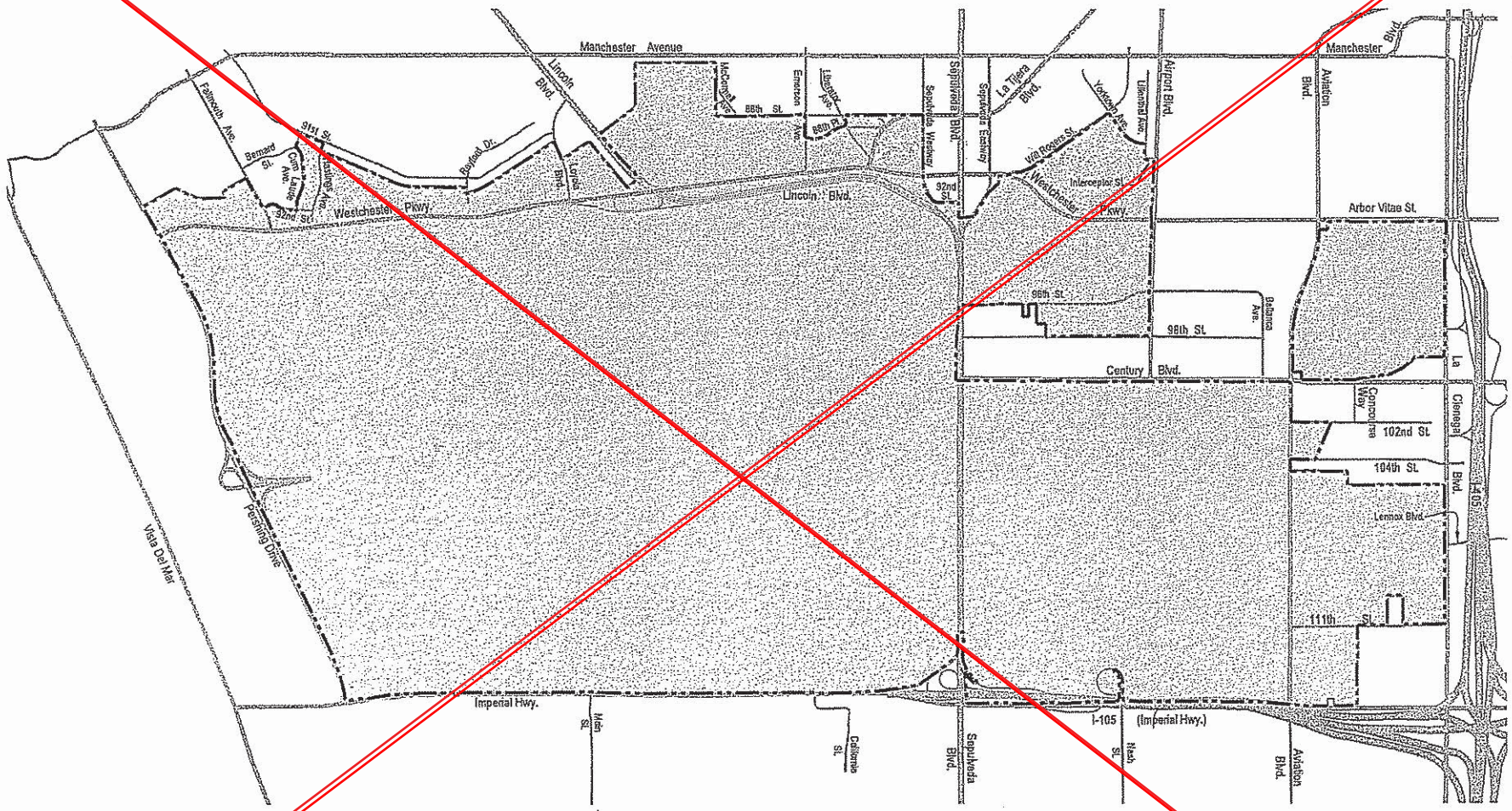
**Monitoring and Reporting**

1. LAWA shall prepare and submit annual reports to BOAC, the Department of City Planning, LADOT and City Council, and post on the LAWA website for the following:

**(a) Traffic Generation Report.** A traffic report, based on the information required by Section 13 C 1, that identifies the current number of Trips being generated by LAX (inclusive of all the following Subareas: Airport Airside, Airport Landside and LAX Northside Subareas), the number of Trips anticipated to be generated at the completion of any Project(s) in development at the time of the report, and the number of Trips anticipated to be generated by on-going Airport construction activities.

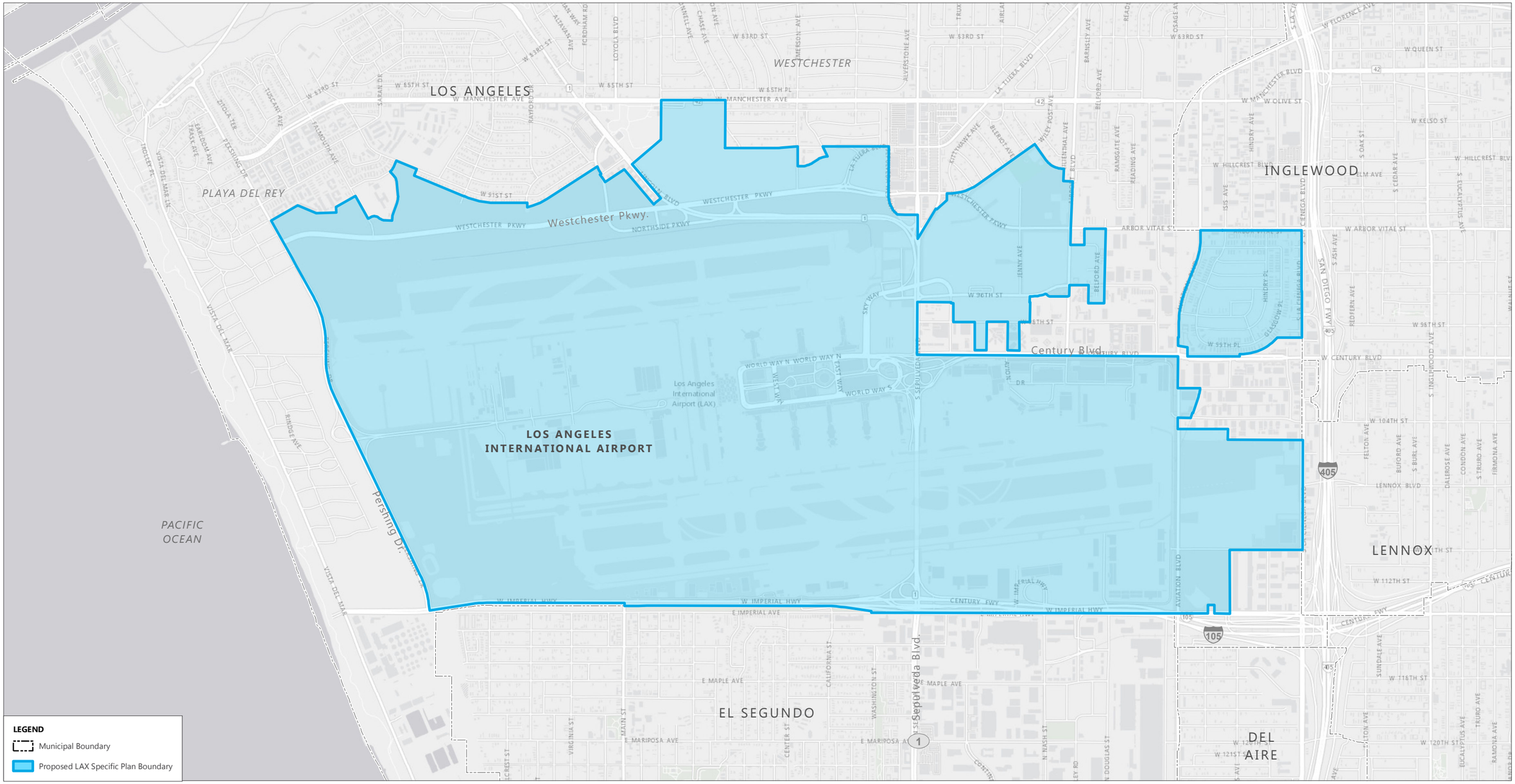
**(b) Aviation Activity Analysis.** An aviation activity analysis that identifies the current number of passengers, volume of air cargo and aircraft operations served at LAX. In order to monitor that regional aviation system improvements are taking place in a timely manner, LAWA will also compile aviation activity statistics for other airports in the Los Angeles region for monitoring and reporting purposes. Passengers, volume of air cargo and aircraft operations activity at all airports with scheduled passenger or cargo activity in Los Angeles, Orange, Riverside, San Bernardino and Ventura counties will be compiled in coordination with the Southern California Association of Governments (SCAG). The analysis shall also include the proportion of aviation activity served at each airport in the region.

**(c) Mitigation Monitoring and Reporting Program.** A status report on compliance with commitments and mitigation measures contained in any adopted Mitigation Monitoring and Reporting Program.

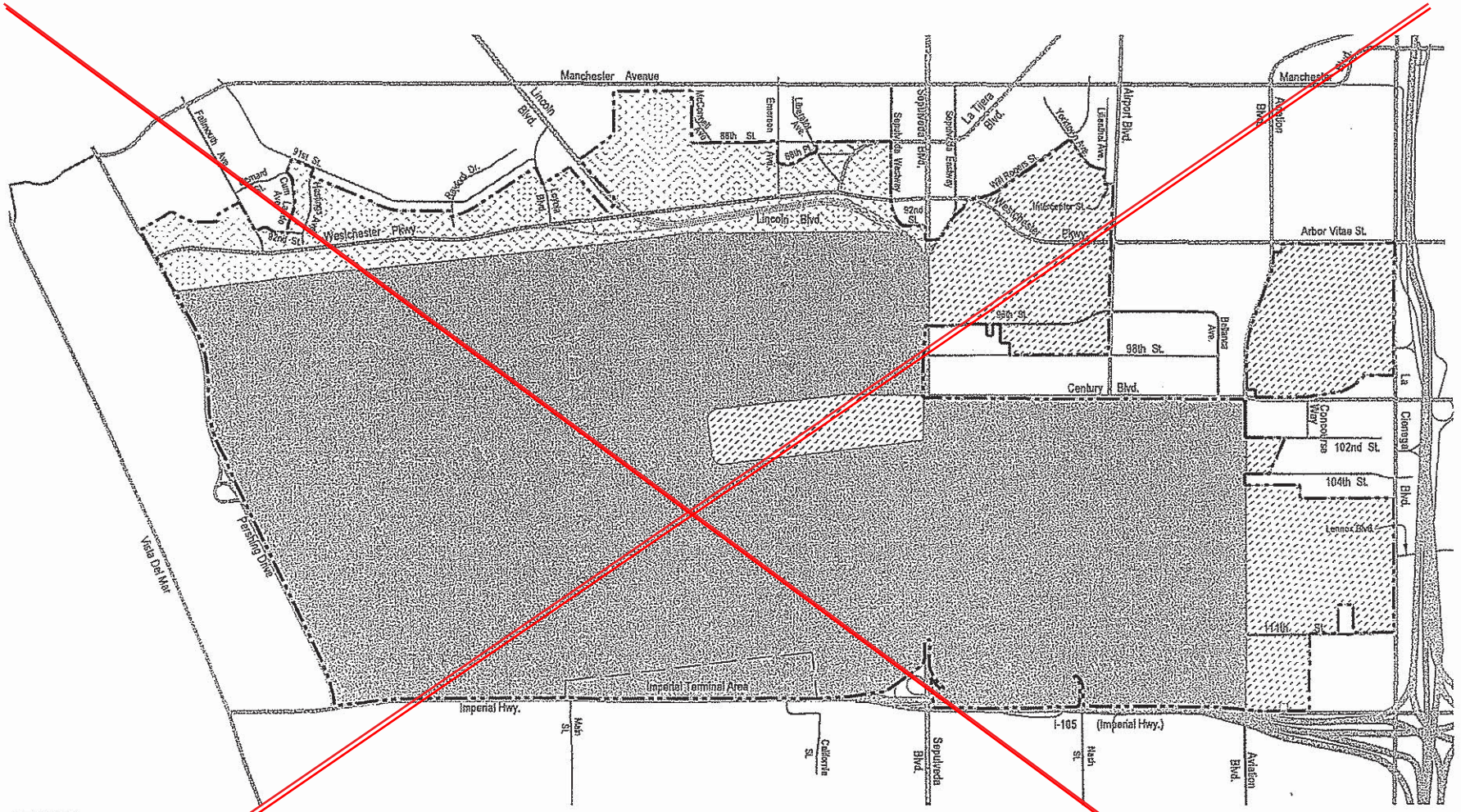



# LAX Specific Plan

*Map 1*
*Specific Plan Boundary*

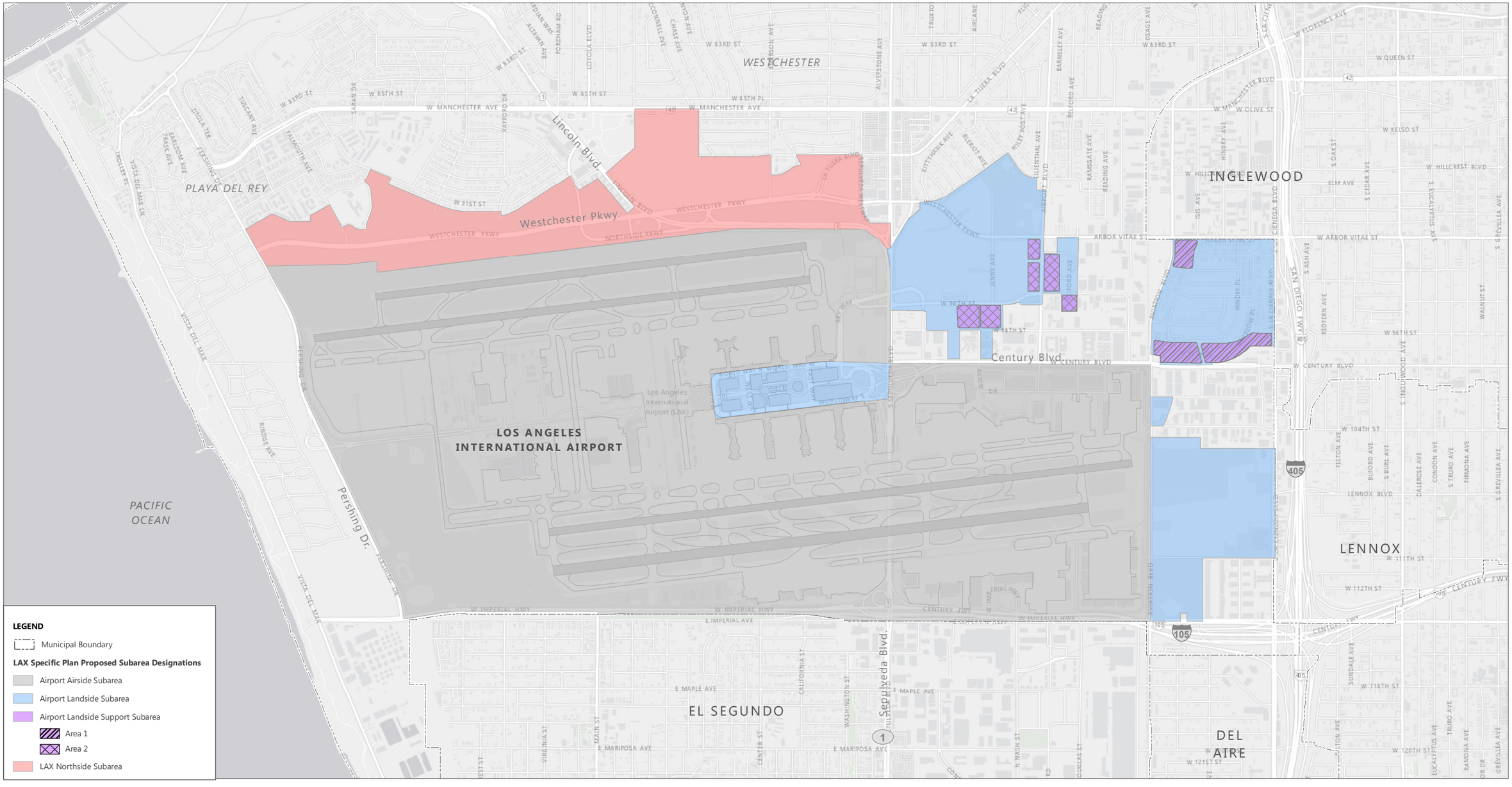



Proposed Figure 1
LAX Specific Plan Boundary Map

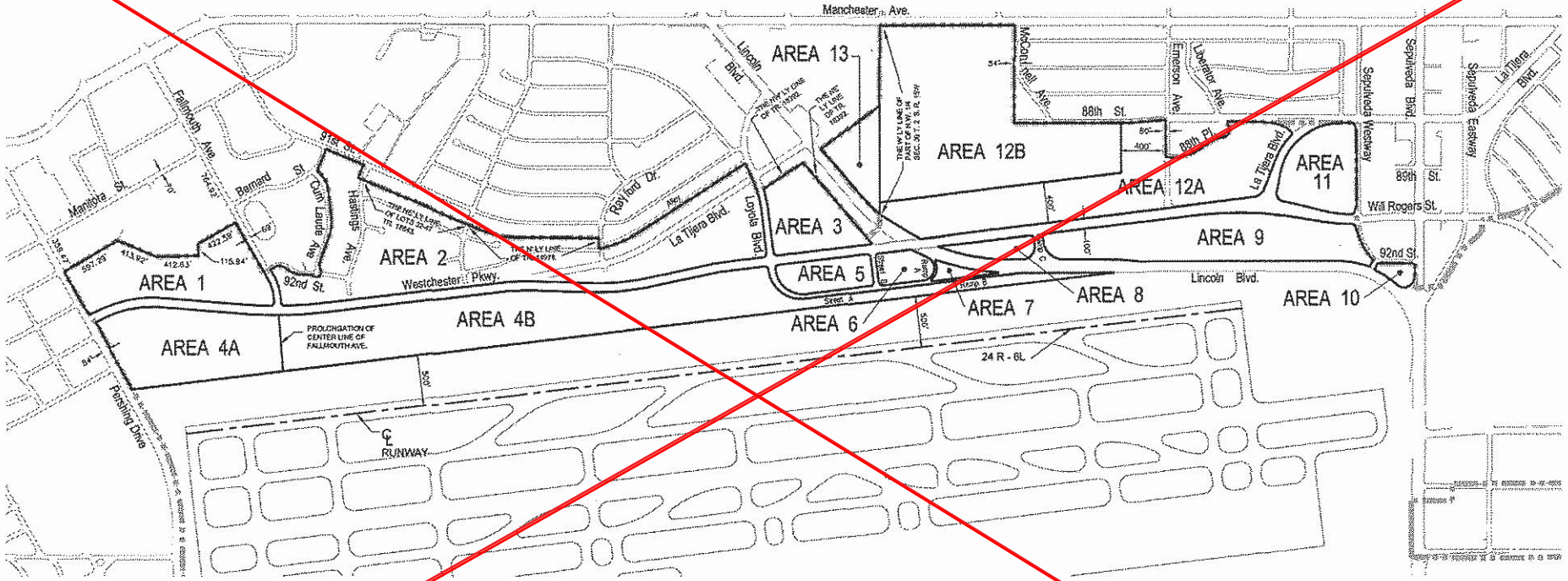



# LAX Specific Plan

*Map 2*
*Specific Plan Sub-Areas*




Proposed Figure 2
LAX Specific Plan Subareas

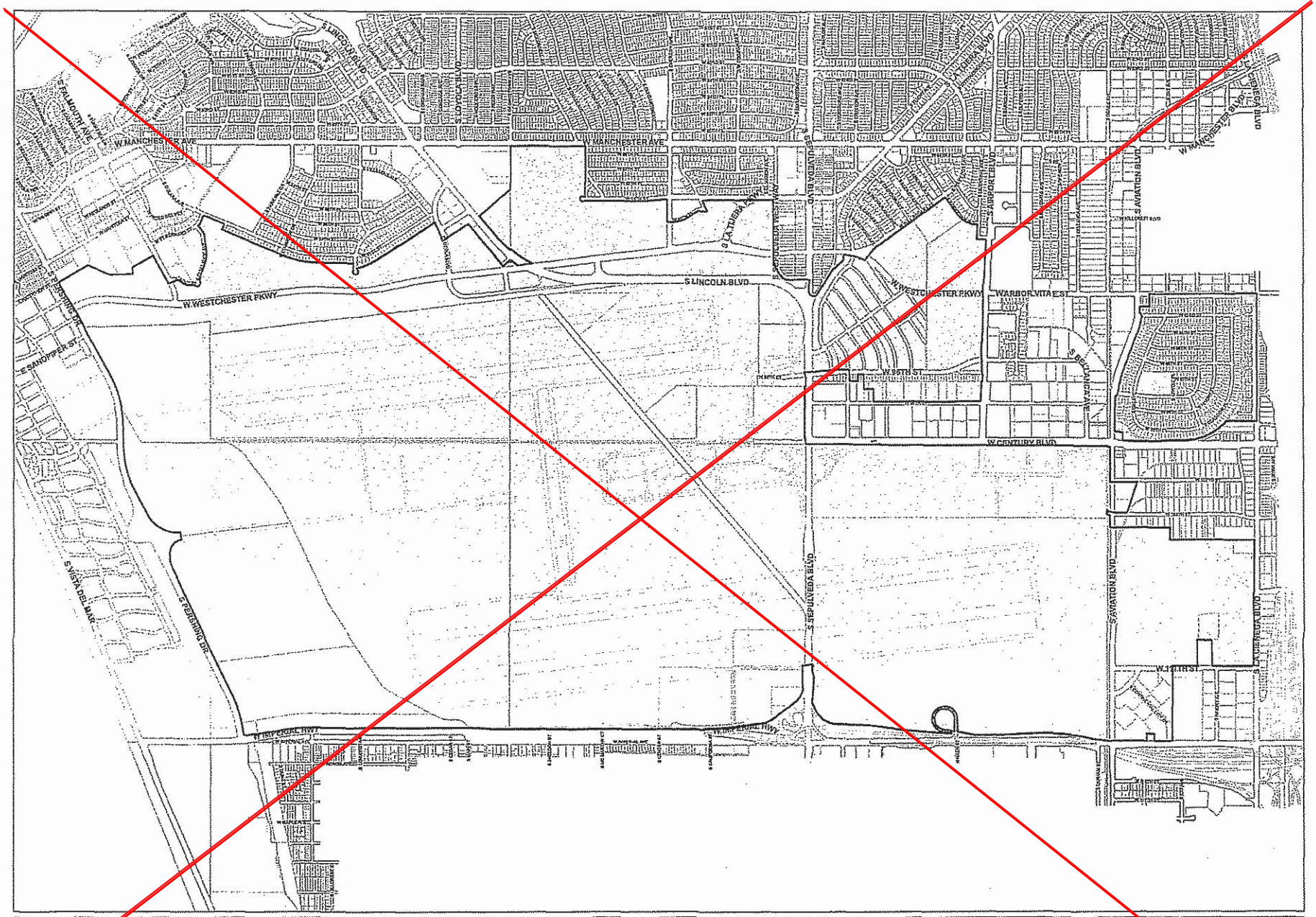



# LAX Specific Plan

*Map 3*
*Parcels within the LAX Northside Sub-Area*




~~Map~~ Figure 3
Areas within the LAX Northside ~~Sub-Area~~ Subarea




# LAX SPECIFIC PLAN BOUNDARY

| C.M. 096 B 157, 096 B 161, 096 B 165, 096 B 169, 093 B 153, 093 B 157, 093 B 161, 093 B 165, 093 B 169, 093 B 173, 090 B 153, 090 B 157, 090 B 161, 090 B 165, 090 B 169, 090 B 173, 087 B 153, 087 B 157, 087 B 161, 087 B 165, 087 B 169, 087 B 173 | CPC 2012-3357 GPA SP |
|---|---|

DATA SOURCES: DEPARTMENT OF CITY PLANNING - BUREAU OF ENGINEERING

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5. Section 7, LAX Specific Plan Compliance Review, Item F.2, Executive Director's Review, has been revised. The language that was added to the end of paragraph 2.(a), has been deleted. Substitute language has been agreed upon by LAWA and the City of Los Angeles Planning Department on a Director of Planning Consistency Determination. Item F.2,(c), has been revised to change the word "clearance" to "process". Items F.2.(d), F.2.(e) have been revised and a new Item F.2.(f) added, as follows:

   (d) Director of Planning Consistency Determination for Projects located in the LAX Northside Subarea North of Westchester Parkway and the LAX Landside Support Subarea. For proposed Projects located within the LAX Northside Subarea north of Westchester Parkway and the LAX Landside Support Subarea, the Executive Director shall transmit a copy of the written description of the proposed Project to the Director of Planning. The Director of Planning shall review the proposed Project for consistency with the following LAX Specific Plan Sections: Northside north of Westchester Parkway - Sections 12, 13.C.2, 14.D, and 15A; Landside Support Subarea – Sections 11, 13.C.3 and 14; and shall provide the Executive Director with a written determination within 75 days from the date the documents were received, unless the Director of Planning and the Executive Director agree more time is necessary. The Executive Director shall provide the BOAC with a copy of the Director of Planning's Consistency Determination.

   (e) If the Executive Director determines that the Project is consistent with the LAX Plan, all applicable provisions of this Specific Plan and with the requirements of CEQA, the Executive Director shall prepare a written report and transmit this report to BOAC for its action on the LAX Specific Plan Compliance request. This written report shall include findings to support the Executive Director's recommendation, ~~the applicable master plan commitments and mitigation measures~~, the ~~applicable~~ mitigation measures identified in ~~any subsequent~~ applicable environmental review documents, the applicable traffic improvements and right-of-way dedications, ~~and~~ any conditions of approval that shall be imposed on the Project and if applicable, pursuant to Section 7.F.2.(d), the Director of Planning Consistency Determination. As a part of this written report, the Executive Director shall summarize the traffic generation report and aviation activity analysis, if applicable,~~ required in Subsection G 1 below,~~ and any written comments received. ~~the results of the consultation with the LAX Master Plan Stakeholder Liaison. The Executive Director shall also attach the reports submitted by the LADOT General Manager and the City Engineer.~~

   (f) If the Executive Director determines that the Project is not consistent with the LAX Plan and all applicable provisions of this Specific Plan, the Executive Director may direct staff to reconsider the Project, analyze or redesign the Project, or recommend that BOAC seek an amendment to the LAX Plan and/or an amendment or exception to the Specific Plan pursuant to LAMC Sections 11.5.6 and/or 11.5.7 F and G, as appropriate.

6. Section 7, LAX Specific Plan Compliance Review, Item F.3, Notice Requirements for BOAC Hearing, has been revised. Item 3.(b) has been revised to include the following language:

   Notice shall also be given by sending written notice by First Class Mail or email at least 15 days prior to the meeting date to: the Councilmember of the district in which the Specific Plan Area is located, the Neighborhood Council of Westchester/Playa del Rey, *owners of all property within and outside of the City that is within 500 feet of the proposed Project,* and interested parties who have filed a written request with LAWA for the Project.

7. Section 7, LAX Specific Plan Compliance Review, Item F.5, Effective Date of Decision, has been revised, as follows:

   Effective Date of Decision. *Unless a City Council Consistency Determination Review is required pursuant to Section 7.F.6 (Consistency Determination Review by City Council),* BOAC's decision shall become final ~~following five (5) Council business days consistent with Section 245 of the Los Angeles City Charter~~ *at the expiration of the next five meeting days of the City Council during which the Council has convened in regular session, unless, pursuant to Los Angeles City Charter, the action is brought before it or Council waives review of that action.*

8. A new Item F.6 has been added, as follows:

   *6. Consistency Determination Review by City Council.*

   *(a) If the BOAC approves a proposed Project located within the LAX Northside Subarea north of Westchester Parkway or the LAX Landside Support Subarea with a Consistency Determination that is inconsistent with the Director of Planning Consistency Determination for that proposed Project, the Consistency Determination shall be reviewed by the City Council.*

   *(b) Public Hearing and Notice. Before acting on the Consistency Determination, the City Council shall set the matter for hearing, giving a minimum of 15 days notice to the applicant, the Councilmember of the district in which the Specific Plan Area is located, the Executive Director and the Director of Planning, and interested parties who have requested notice in writing for the Project.*

   *(c) City Council Consistency Determination. The City Council shall make the same Consistency Determination required to be made by the Director of Planning pursuant to section 7.F.2.(d) above, supported by facts in the record, and indicate why the BOAC Consistency Determination is either approved or disapproved. The City Council shall act upon a Consistency Determination within 90 days after the matter is provided to the City Council for determination. The failure to act within the 90 days shall be deemed City Council concurrence with the BOAC Consistency Determination, and the original action on the matter shall become final. If the City Council determines that the BOAC approved Project is consistent with the applicable provisions of the LAX Specific Plan, the BOAC action shall become final. If the City Council determines the BOAC approved Project is not consistent with the applicable provisions of the LAX Specific Plan, the*

*applicant shall be required to seek an Amendment, Exception, or a Project Permit Adjustment to the Specific Plan pursuant to LAMC Sections 11.5.6 and/or 11.5.7E, F and G, as appropriate.*

9. Section 13, Transportation Regulations and Streetscape, Item C, Trip Generation. The version of the LAX Specific Plan contained in Appendix D of the Draft EIR showed paragraphs 2 and 3 under Item 13.C. as being deleted. This was inadvertent. Those two paragraphs, have been reinstated, with the following revisions:

   The Master Plan FEIS/EIR forecasts the net new Trips from Projects identified at full build out of the Master Plan, after implementation of mitigation measures, to be no more than 8,236 trips at airport peak hour. If the annual traffic generation report described ~~above~~ in Appendix A of this Specific Plan, and/or the annual traffic generation report considered together with any Project-specific traffic study for a project identified in the Master Plan, shows that development of the projects identified in the Master Plan is likely to increase the Trips beyond 8,236, LAWA shall complete ~~the Specific Plan Amendment Study required in Section 7 H of this Specific Plan.~~a Study to identify and recommend additional trip reduction program measures and LAWA shall include in future annual reports an analysis of the on-going effectiveness of those measures.

   No ~~Specific Plan Amendment~~ Study shall be required if the annual traffic generation report, and/or the annual traffic generation report considered together with any Master Plan Project-specific traffic study, determines that the net new Trips are anticipated to exceed 8,236 in the airport peak hour, but this increase in Trips will only be temporary until the Project(s) and associated mitigation measures are complete and/or if this increase in Trips is consistent with the number of Trips anticipated to occur during the peak year of traffic impacts as analyzed in the Master Plan FEIS/EIR. In this case, the traffic generation report shall evaluate the effectiveness of future Projects and mitigation measures in ultimately reducing the number of net new Trips to 8,236 in the airport peak hour at buildout of the Master Plan. Any LAX Plan Compliance approval for a Project shall include any conditions necessary to ensure the ultimate reduction. If Trip reduction program measures are recommended, LAWA shall include in future annual reports an analysis of the on-going effectiveness of those measures and, if the Trip reductions are not effectuated, additional measures may be implemented. ~~and/or a Specific Plan Amendment Study may be triggered.~~

10. Section 13, Transportation Regulations and Streetscape, Item C, Trip Generation, sub-item 2, LAX Northside Subarea, paragraph 3. The version of the LAX Specific Plan contained in Appendix D of the Draft EIR deleted language concerning peak hour trips identified in the LAX Master Plan. This language was inadvertently deleted and has been added back to the LAX Specific Plan.

11. Section 14, Sign Regulations, Item C, last sentence. The Ordinance Number (No. 183737) for the LAX Sign District Ordinance, has been added to the text.

## Appendix F Air Quality, Greenhouse Gas Emissions, and Human Health Risk Assessment

1. The following note is hereby added to the Appendix F attachment cover page of the Draft EIR:

   *Data and model files are available upon request.*

2. Several revisions have been made to the calculations relating to the Project-related construction emissions and subsequent analyses. The corrected pages can be found in Attachment 2.

   - In the Draft EIR, concrete delivery distances reflected the maximum expected distance from off-site concrete batch plants to the Project location. In the Final EIR, concrete delivery distances were adjusted to match Project-specific delivery pathways between the planned on-site concrete batch plants and other on-site Project locations. These changes are reflected in the "Assumptions" page provided in Appendix F.1.1.
   - In the Draft EIR, concrete batch plants were modeled assuming a default AP-42 batch plant configuration. In the Final EIR, concrete batch plant configurations were adjusted to match those specified in LAWA's permits. Emissions associated with concrete batch plants were adjusted respective to the revised batch plant configurations using AP-42 emission factors. These changes are reflected in the "Fugitive Dust - Emissions due to Batching" page provided in Appendix F.1.1.
   - In the Draft EIR, fugitive dust emissions associated with grading activities were reflected both in the Project-specific "Fugitive Dust - Emissions due to Grading" page and in the equipment-specific "Fugitive Dust - Emissions due to Equipment" page. This led to fugitive dust emissions from grading being double counted in the draft EIR emissions summary and all subsequent analyses. In the Final EIR, for the purposes of evaluating fugitive dust associated with grading, fugitive dust emissions associated with grading were removed in the equipment-specific "Fugitive Dust - Emissions due to Equipment" page and were unchanged in the Project-specific "Fugitive Dust - Emissions due to Grading" page. This change means that fugitive dust emissions associated with grading are no longer being doubled counted in the EIR. These changes are reflected in Appendix F.1.1.
   - In the Draft EIR, mitigation related to EPA tier requirements for off-road, on-site construction equipment were modeled assuming 35% tier 4 final, 35% tier 4 interim, and 30% tier 3. LAWA updated off-road, on-site equipment requirements to 40% tier 4 final, 40% tier 4 interim, and 20% tier 3 for the purposes of mitigating potential significant impacts to human health risk identified in the Draft EIR. In the Final EIR, mitigation related to EPA tier requirements for off-road, on-site construction equipment were updated to reflect LAWA's updated mitigation commitments in the emissions model. These changes are reflected in the "Assumptions" page provided in Appendix F.1.1.
   - In the Draft EIR, the locations of on-site concrete batch plants were specified to be located at the Rental Car Ready/Return Parking staging area, the Quick Turn Around (QTA) staging area, and the QTA Support & Additional Site Functions staging area. In the Final EIR, the batch plant located in the QTA Support & Additional Site Functions staging area has been moved to the ITF East staging

area location. These changes are reflected in the modeled results provided in Appendix F.1.2 and F.1.3.

- In the Draft EIR, the implementation of the Alternative Diesel Fuel mitigation measure in the emissions inventory incorrectly reduced fugitive dust particulate matter emissions. In the Final EIR, the implementation of the Alternative Diesel Fuel mitigation measure was revised to no longer reduce fugitive dust particulate matter emissions. These changes are reflected in the "Pollutants – Emission Factors" pages provided in Appendix F.1.1.
- In the Draft EIR, the implementation of the Alternative Diesel Fuel mitigation measure in the emissions inventory incorrectly did not reduce emissions associated with on-road, off-site (hauling) equipment. In the Final EIR, the implementation of the Alternative Diesel Fuel mitigation measure was revised to correctly apply to on-road, off-site (hauling) equipment. These changes are reflected in the "Pollutants – Emission Factors" pages provided in Appendix F.1.1.

3. The last sentence of the second paragraph under Section 1.1 Purpose on page 1-1 of Appendix F.2 of the Draft EIR is hereby revised as follows:

   The proposed Project would not increase passenger or gate capacity to LAX and would not increase *the numbers of* flights ~~and/~~or *basic* operations at LAX. *The project is expected to make passenger access to the airport more efficient, which may be beneficial in terms of vehicle emissions.*

4. The last four paragraphs under Section 1.1 Purpose starting on the bottom of page 1-1 of Appendix F.2 of the Draft EIR are hereby revised as follows:

   Construction of the proposed Project is projected to take approximately 1*1*4 years with the majority of the construction being completed in the first 5 years. Construction of the proposed Project would result in temporary emissions of various air pollutants from on-site and off-site construction equipment, *and from* fugitive dust, fugitive volatile organic compounds (VOCs), and worker vehicle trips.

   Emissions evaluated in the HHRA include *releases from* both construction and operational sources. Therefore, human health risks associated with both construction and operational activities associated with the proposed Project are evaluated in this HHRA.

   *Construction and operations* emissions form the basis for estimating impacts from *inhalation of* TAC. Emissions were calculated for ~~the~~ 2014 baseline conditions and for 2024 conditions with and without the LAX Landside Access Modernization Program. Additionally, simplified emission inventories for 2035 conditions were calculated using the California Emissions Estimator Model (CalEEMod) program for emissions from future potential development. Incremental emissions were developed for ~~the~~ With Project in 2024 ~~relative~~ *compared to* 2014 baseline conditions and to 2024 Without Project conditions~~ and for the~~. *Likewise, incremental emissions for* With Project in

2035 relative to 2014 baseline conditions and to 2035 Without Project conditions *were also developed*.

~~Possible~~*Incremental emissions estimates were then used as input for air dispersion modeling and resulting downwind concentration of TAC were used to estimate* human health risks associated with the proposed Project~~ were estimated using modeled~~. TAC concentrations in air ~~and~~*were estimated using* standard methods developed by California Environmental Protection Agency (CalEPA) and U.S. Environmental Protection Agency (USEPA). Health impacts were evaluated for cancer risks and chronic and acute non-cancer health hazards. An impact was considered significant *under CEQA* if cancer risks or non-cancer health hazards exceeded *accepted* regulatory thresholds.

5. The last two sentences in the first paragraph under Section 1.2 General Approach on page 1-2 of Appendix F.2 of the Draft EIR are hereby revised as follows:

   The dispersion model predicted possible concentrations of TAC released during ~~airport~~ *Landside Access Modernization Program* construction ~~within the study area around the airport.~~*at numerous locations on airport property and in neighboring areas north, east and south of LAX.* Modeled concentrations were used to estimate human health risks and hazards *at each of these locations,* which serve as the basis of the significance determinations for the proposed Project.

6. The first two sentences of the second paragraph under Section 2 Methodology on page 2-1 of Appendix F.2 of the Draft EIR is hereby revised as follows:

   Emissions sources during construction were analyzed for each construction year from 2017 through 20*27*~~30~~. For the operational scenario, emissions sources were analyzed for 2024 and 2035 with and without the proposed Project, as well as for 2014 baseline conditions ~~in order~~ to determine the incremental impact.

7. The last bullet on page 2-1 under Section 2 Methodology of Appendix F.2 of the Draft EIR is hereby revised as follows:

   - Characterization of the magnitude of health risks ~~for~~*within* the exposed community, and *identification* of locations in the community where the greatest risks or hazards may be realized (Risk Characterization)

8. The heading for Section 2.2.1 on page 2-4 of Appendix F.2 of the Draft EIR is hereby revised as follows:

   2.2.1 ~~Exposure~~*Exposed* Populations

9. The heading for Section 2.2.3 on page 2-5 of Appendix F.2 of the Draft EIR is hereby revised as follows:

   2.2.3 Exposure *Point* Concentrations

10. The last two paragraphs on page 2-7 in Section 2.2.3 Exposure Concentrations of Appendix F.2 of the Draft EIR is hereby revised as follows:

For the construction analysis, the focus of construction activities is assumed to move as different portions of the proposed Project are constructed throughout the 1*1*4-year construction period. To incorporate this variability into the model, construction emissions were modeled separately for each year of construction. Risks for receptors were calculated by grid point for each year of construction .and then added together to determine total risk ~~by grid point. For~~*for locations in* the ~~portion of the receptors' exposure periods that was longer than the construction period, construction emissions were assumed to be zero; however, cancer risks for the years following construction were calculated using the TAC concentrations from emissions from operations. TAC concentrations from emissions from operations were added to the TAC concentrations from emissions from construction for all years after the 2024 horizon year when operations were assumed to commence. For receptors whose exposure periods extended beyond 11 years past the 2024 horizon year, the 2035 horizon year TAC concentrations were used for the remainder of their exposure period.~~*study area.*

*TAC concentrations from emissions from operations were added to TAC concentrations from emissions from construction for years 2024 until 2027 when construction and LAMP operations are anticipated to overlap. The greatest construction efforts are expected in the first five years of the project (2017 to 2022), Operations changes due to new construction will not begin until after this time period.*

*For receptors with exposure durations that exceed the construction period, construction emissions were set to zero (0). Emissions from operations would continue following construction and TAC concentrations associated with these emissions were used to estimate post-construction exposure. After 2024, TAC concentrations and exposures were assumed to change linearly until 2035. Horizon year 2035 is the final year that operations predictions are available. After year 2035, TAC concentrations and exposures are assumed to be constant. The only risk estimates affected by this latter assumption are health risks for people that spend their entire lives near the airport.*

The locations of *some* grid points were selected to ~~be representative of~~*represent* where construction impacts were likely to be greatest~~. Such risk estimates~~ *(i.e., downwind and near airport boundaries). Risk estimates for people living, working or going to school in these locations will* overestimate risks for most people ~~living, working or attending school near~~ within the study area, which extends north and south away from prevailing east-southeast winds and for miles west of the LAX~~. This~~ *boundary. Since risk estimates at points of maximum impact are used to determine significance under CEQA, notable* conservatism (protection) is built into the risk assessment ~~developed for the proposed Project to help~~. *Intentional overestimation of health risks for almost everyone in the study area helps to* counter any ~~future~~ changes in Project construction *activities and/or timeline* that cannot now be anticipated quantitatively.

11. The last sentence of the first full paragraph on page 2-8 in Section 2.2.3 Exposure Concentrations of Appendix F.2 of the Draft EIR is hereby revised as follows:

    The ~~potential~~ impact of these ~~updates~~*updated parameters* is examined in the uncertainty analysis.

12. The second full paragraph on page 2-8 in Section 2.2.3 Exposure Concentrations of Appendix F.2 of the Draft EIR is hereby revised as follows:

    In addition to ~~the~~ exposure parameters presented in Table 2-2, some ~~of the~~ exposure parameters vary according to age groups to ~~address the~~*be consistent with* methodology detailed in ~~the~~ CalEPA Air Toxics Hot Spots Program Guidance. These exposure parameters are presented in Table 2-3.

13. The first full paragraph on page 2-9 of Appendix F.2 of the Draft EIR is hereby revised as follows:

    The CalEPA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments recommends a range of exposure parameters be evaluated. Additional analyses are presented in the uncertainties ~~analysis~~*assessment* to ~~verify how sensitive~~ *illustrate sensitivity of* risk ~~estimates are~~*calculations* to changes in exposure duration and exposure time~~ might affect conclusions concerning impacts of the proposed Project~~.

14. The following sentence is added to the end of the second full paragraph under Section 2.3 Toxicity Assessment on page 2-9 of Appendix F.2 of the Draft EIR:

    Only toxicity criteria from EPA and CalEPA were used.

15. Table 2-4 Cancer Slope and Unit Risk Factors on Page 2-11 of Appendix F.2 of the Draft EIR is hereby revised. Please see the following revised table.

16. The first two paragraphs under Section 2.4.1 of Appendix F.2 of the Draft EIR starting on page 2-14 are hereby revised as follows:

    Concentrations of TAC of concern in air, locations of ~~potentially~~ exposed populations, including locations for MEI ~~exposure scenarios~~ (worker, resident, student), and toxicity criteria were used to calculate incremental human health risks associated with the proposed Project. Risks for people recreating ~~near~~*in* the ~~airport~~*study area* would be lower than ~~those~~*risks* for workers, residents, and students at any given location because of much shorter times spent in recreational activities. No risks were calculated for this population. Where risks are not significant for other receptor groups, risks for recreational visitors near LAX can also be considered insignificant.

    Cancer risks were estimated by multiplying exposure estimates for carcinogenic chemicals by corresponding cancer slope factors~~. Results were~~, *using methodology developed by CalEPA. EPA uses inhalation unit risk factors for estimating cancer risks, as discussed under uncertainties.*

    *Risk* estimates *are* expressed as the odds of developing cancer. *as a consequence of exposure to airport-related TAC emissions. These estimates do not include typical incidence of cancer in the US, which may be as high as 1 in 4 to 1 in 2.* Commonly, risks (or odds) of developing cancer of one to ten in one million (1 x 10-6 to 10 x 10-6) or less are considered de minimis. Higher risks may be deemed significant in some instances. Cancer risks were based on an exposure duration of ~~70~~ 30 years.

**Table 2-4 Cancer Slope and Unit Risk Factors**

| TAC OF CONCERN | INHALATION CANCER SLOPE FACTOR [(MG/KG/DAY)$^{-1}$]$^{1}$ | | INHALATION UNIT RISK FACTOR [(µG/M$^3$)$^{-1}$]$^{2}$ | | TUMOR SITE/INHALATION | CANCER CLASSIFICATION$^{3}$ |
|---|---|---|---|---|---|---|
| | EPA$^{4}$ | CAL/EPA$^{5}$ | EPA$^{4}$ | CAL/EPA$^{5}$ | | |
| **VOC** | | | | | | |
| Acetaldehyde | 0.0077 | 0.01 | 0.0000022 | 0.0000027 | Nasal, Larynx | B2 |
| Acrolein$^{6}$ | NA$^{7}$ | NA | NA | NA | NA | C |
| Benzene | 0.0273 | 0.1 | 0.0000078 | 0.000029 | Blood | A |
| 1,3-Butadiene | 0.105 | 0.6 | 0.00003 | 0.00017 | Reproductive System, Blood, Lung, GI | A |
| Ethylbenzene | 0.00875 | 0.0087 | 0.0000025 | 0.0000025 | Kidney | D |
| Formaldehyde | 0.0455 | 0.021 | 0.000013 | 0.000006 | Respiratory System | B1 |
| **PAH** | | | | | | |
| Naphthalene | 0.119 | 0.12 | 0.000034 | 0.000034 | Respiratory System | C |
| **Diesel Exhaust** | | | | | | |
| Diesel Particulates | 1.05 | 1.1 | 0.0003 | 0.0003 | Lung | D |
| **PM-Metal** | | | | | | |
| Arsenic | 15.1 | 12 | 0.0043 | 0.0033 | Skin | A |
| Cadmium | 6.3 | 15 | 0.0018 | 0.0042 | Lung, trachea, bronchus cancer deaths | B1 |
| Chromium VI | 42 | 510 | 0.012 | 0.15 | Lung | A |
| Lead | NA | 0.042 | NA | 0.000012 | NA | B2 |
| Nickel | 0.84 | 0.91 | 0.00024 | 0.00026 | NA | A |

NOTES:

1 mg/kg/day - milligram per kilogram per day

2 µg/m3 = microgram per cubic meter

3 USEPA, EPA Weight of Evidence (EPA 1986, EPA 1996):

- A Human carcinogen
- B1 Probable human carcinogen - indicates limited evidence in humans
- B2 Probable human carcinogen - indicates sufficient evidence in animals and inadequate or no evidence in humans.
- C Possible human carcinogen
- D Not classifiable as human carcinogen

4 Environmental Protection Agency, Integrated Risk Information System, Toxicity Criteria Online Database, Available: https://cfpub.epa.gov/ncea/iris2/atoz.cfm. Unit risk values were converted to mg/kg/day-1 for the cancer slope factor.

5 California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Toxicity Criteria Online Database, Available: http://oehha.ca.gov/chemicals.

6 Although acrolein has been classified as a possible human carcinogen, its potential carcinogenicity cannot be determined because the existing "data are inadequate for an assessment of human carcinogenic potential for either the oral or inhalation route of exposure." USEPA. Guidelines for carcinogen risk assessment. Review draft. NCEA-F-0644, July 1999. Risk Assessment Forum.

7 NA = Not available

SOURCE: CDM Smith, 2017
PREPARED BY: CDM Smith, 2017.

17. The last paragraph under Section 2.4.1 of Appendix F.2 of the Draft EIR on page 2-15 is hereby revised as follows:

> To determine whether releases of TAC during construction *and/*or operation of the proposed Project would be significant, incremental human health risks for the proposed Project were compared to appropriate thresholds of significance identified in SCAQMD or CalEPA guidance or policy. These comparisons focus on specific ~~risk~~ thresholds ~~such as~~of ten in one million cancer risk or a HI of 1.

18. The first paragraph under Section 2.4.2 of Appendix F.2 of the Draft EIR on page 2-15 is hereby revised as follows:

> ~~For~~*One goal of the HHRA is to identify the magnitude and location of greatest impacts of* the proposed Project~~, grid points~~. *To this end and based on previous dispersion modeling for LAX, exposure and risk* were analyzed along the airport fence-line and ~~within the study area.~~near-fenceline community. In addition, *risks and hazards were estimated at* five on-airport grid points that were not within the Project site~~ were also modeled (for on airport/off site workers).~~ and in the center of LAX (for on airport/on site construction workers). ~~These locations are anticipated to represent MEI, based on previous dispersion modeling for LAX.~~ Concentrations of each TAC at ~~these nodes~~*locations* were used in calculating cancer risk, and chronic and acute non-cancer health hazard estimates. ~~These calculations were used to identify locations with maximum cancer risks and maximum non-cancer health hazards and serve as the basis for significance determinations.~~

19. The last sentence of the second paragraph under Section 2.4.2 of Appendix F.2 of the Draft EIR on page 2-16 is hereby revised as follows:

> Locations of schools, hospitals, nursing homes, daycares, etc. were identified as sensitive receptor locations and designated as residential/commercial so that these grid points ~~would be~~*were* evaluated for both worker and residential receptors.

20. The three paragraphs under Section 2.4.3 of Appendix F.2 of the Draft EIR on page 2-16 are hereby revised as follows:

> Acute non-cancer risk estimates were calculated by dividing estimated maximum 1-hour TAC concentrations in air by acute RELs. An acute REL is a concentration in air below which adverse effects are unlikely for people, including sensitive subgroups, exposed for a short time on an intermittent basis. USEPA defines intermittent exposure as an exposure lasting less than 24 hours and occurring no more than monthly.[31] ~~Since m~~*M*argins of safety are incorporated *when developing RELs* to address data gaps and uncertainties, *and* exceeding ~~the~~*a* REL does not automatically indicate an adverse health impact.

Toxicity criteria (i.e., RELs) for acute non-cancer health hazards do not distinguish between adults and children, and ~~are established at levels that are considered protective of sensitive populations. An acute REL is a concentration in air below which adverse effects are unlikely, including in sensitive subgroups. In~~ *in* most cases, ~~RELs were estimated on the basis of a~~ *are based on* 1-hour exposure duration. CalEPA's OEHHA has developed acute RELs for several ~~of the~~ TAC of concern identified in *airport* emissions~~ from the airport~~.

Short-term concentrations for TAC associated with Project construction were estimated using the same air dispersion model (AERMOD) used to estimate annual average concentrations, but with the model option for 1-hour maximum concentrations selected. ~~These concentrations represent~~*Modeling results identify locations where* the highest ~~predicted~~*concentrations of TAC may occur, as well as estimated maximum* concentrations ~~of TAC~~*throughout the study area*. Acute non-cancer health hazards were then estimated at each grid point by dividing estimated maximum 1-hour TAC concentrations in air by acute RELs. ~~A HI equal to or~~*As discussed above for chronic non-cancer health impacts, a HI* greater than 1, the threshold of significance for acute non-cancer health impacts, indicates some potential for adverse acute ~~non-cancer health~~ impacts. A HI *of or* less than 1 suggests that adverse acute non-cancer health impacts are not expected.

[31] California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Risk Assessment Guidelines Technical Support Document For the Derivation of Noncancer Reference Exposure Levels, June 2008. Available at: http://oehha.ca.gov/media/downloads/crnr/noncancertsdfinal.pdf

21. The first two paragraphs under Section 2.4.4 of Appendix F.2 of the Draft EIR starting on page 2-16 are hereby revised as follows:

*Population-based health impact was evaluated since the proposed Project has the potential for exposing large numbers of people to emissions.* The purpose of ~~a population-based health impact~~*this type of* assessment is to provide perspective on the magnitude of ~~the~~ potential public health threat posed by emissions of a project. Population-wide risk assumes that a population (not necessarily the same individuals) will live within the study area over a 70-year ~~life~~time period.

To evaluate this population-wide risk, ~~the~~ cancer burden method*s* ~~was~~*were* used to assess the number of excess cancer cases that could occur in the study area population. ~~The~~*That is, if* cancer *risk calculations are accurate, how many actual case of cancer might arise in people living in the study area as a result of exposure to Project-related TAC. Cancer* burden was calculated by multiplying ~~the~~ cancer risk calculated for a 70-year resident at a grid point by the number of people who live in the census block associated with that grid point. The sum of these estimates represents the cancer burden across ~~each~~ zone*s* of impact *(as defined by individual cancer risk (greater than or equal to* $10^{-6}$, *greater than or equal to* $10^{-5}$, ~~etc.~~*) greater than or equal to* $10^{-4}$*, greater than* $10^{-4}$*)* for the study area. *Zones of impact are used to better illustrate the spatial extent of cancer burden.*

In some cases, a single census block contained more than one modeled grid point. When this *situation* occurred, ~~the~~*an* average of ~~the calculated~~ risks for ~~the~~ grid points within ~~the~~*a* census block was used for the calculation. The result is a single number for each zone of impact that is intended to estimate the number of potential cancer cases within the population that was exposed to the emissions for a lifetime (70 years).

22. The last sentence of the first paragraph under Section 3.1 TAC Emission on page 3-1 of Appendix F.2 of the Draft EIR is hereby revised as follows:

Sources of TAC during operations include on-site roadways, parking lots~~; and~~ heating and cooling for the ITFs, APM stations, and CONRAC*; and fueling equipment emissions generated during operation of the CONRAC*.

23. The third sentence of the second paragraph on page 3-2 of Appendix F.2 of the Draft EIR is hereby revised as follows:

Construction and operational concentrations were combined for the years from 2024 through 20*27*~~30~~ (last year of construction).

24. The heading and first paragraph under Section 3.2.2 Receptors on page 3-2 of Appendix F.2 of the Draft EIR is hereby revised as follows;

3.2.2 ~~Receptors~~*Receptor Locations*

~~Receptors~~ *TAC concentrations in air* were modeled at 9*7*~~2~~0 locations in grids and at specific sensitive receptor locations around the airport. In the construction zone east of *and nearer* the airport~~, the~~ *boundary,* grid spacing was set at 100 meters. Larger spacing was used at locations farther away. Property line receptors were also included, along with several on-airport grid points. ~~The~~*Locations for* modeled ~~receptors~~*air concentrations* are shown on Figure 3 1.

25. The first two bullets under Section 4 Human Health Risk Assessment on page 4-1 of Appendix F.2 of the Draft EIR is hereby revised as follows:

- 2017 Project through 20*27*~~30~~ Project for unmitigated project construction with project operations commencing in 2024
- 2017 Project through 20*27*~~30~~ Project for mitigated project construction with project operations commencing in 2024

26. The two paragraphs after the second set of two bullets on page 4-1 under Section 4 Human Health Risk Assessment of Appendix F.2 of the Draft EIR are hereby revised as follows:

Risk calculations, presented in Attachment 1 to this memorandum, indicate that estimates of cancer risks associated with emissions during construction and operations with implementation of

the proposed Project ~~would be~~*are* above the regulatory threshold of significance within the study area. Chronic non-cancer health hazards and acute non-cancer hazard indices were below the regulatory threshold of significance.

Since health risks were evaluated at locations throughout the study area *(over 65 square miles)* and TAC concentrations vary *widely* from gridpoint to gridpoint, maximum risks and hazards apply to a small subset of ~~receptors~~*people in the study area* and *only* to ~~areas on and around LAX.~~*those people living, working or going to school near LAX boundaries.* Figures showing the anticipated gradation of *decreasing* risks and hazards ~~in the study area~~*with distance from LAX* are provided in this section.

27. The second through fourth sentences of the first paragraph under Section 4.1.1 Comparison of On-Site Air Concentrations with OSHA Limits for On-Site Workers on page 4-2 of Appendix F.2 of the Draft EIR is hereby revised as follows:

    Two years were selected as the peak emission years – 201*8*~~9~~ and 20*19*~~20~~. The year 201*8*~~9~~ is estimated to have the peak diesel exhaust sources and the year 20*19*~~20~~ is estimated to have the peak construction dust emissions for particulate matter. ~~In general, the peak years have nearly twice the emissions of the next closest year.~~

28. Table 4-1: Comparison of CalOSHA Permissible Exposures Limits to Maximum 8-Hour On-Site Air Concentrations During Unmitigated and Mitigated Construction (2019 and 2020) on Page 4-2 of Appendix F.2 of the Draft EIR is hereby revised. Please see the following revised table.

29. Table 4-2: Comparison of CalOSHA Permissible Exposures Limits to Maximum 8-Hour On-Site Air Concentrations During Operation on Page 4-4 of Appendix F.2 of the Draft EIR is hereby revised. Please see the following revised table.

**Table 4-1: Comparison of CalOSHA Permissible Exposures Limits to Maximum 8-Hour On-Site Air Concentrations During Unmitigated and Mitigated Construction (2018~~9~~ and 2019~~20~~)**

| TOXIC AIR CONTAMINANT[1/] | CALOSHA PEL-TWA (UG/M3) [2/] | PROJECT CONCENTRATIONS DURING MAXIMUM 8-HOUR CONSTRUCTION (UG/M$^3$)[3/] | | | |
|---|---|---|---|---|---|
| | | UNMITIGATED | | MITIGATED | |
| | | 2018 | 2019 | 2018 | 2019 |
| 1,2,4-trimethylbenzene | 125,000 | 0.00737 | NA | 0.00378 | NA |
| 1,3-butadiene | 2,200 | 0.00270 | NA | 0.00140 | NA |
| 2,2,4-trimethylpentane | NA[4] | 0.00474 | NA | 0.00255 | NA |
| acetaldehyde | 45,000 | 0.09793 | NA | 0.04935 | NA |
| acrolein | 250 | 0.00004 | NA | 0.00003 | NA |
| benzene | 324 | 0.05021 | NA | 0.03677 | NA |
| cumene | 245,000 | 0.00027 | NA | 0.00014 | NA |
| cyclohexane | 1,050,000 | 0.00060 | NA | 0.00034 | NA |
| ethyl benzene | 22,000 | 0.00447 | NA | 0.00232 | NA |
| ethylene | NA | 0.19347 | NA | 0.09790 | NA |
| formaldehyde | 375 | 0.19633 | NA | 0.09900 | NA |
| hexane | 180,000 | 0.00264 | NA | 0.00144 | NA |
| isoprene, except from vegetative emission sources | NA | 0.00005 | NA | 0.00003 | NA |
| methanol | 260,000 | 0.00044 | NA | 0.00023 | NA |
| methyl ethyl ketone (2-butanone) | 590,000 | 0.01971 | NA | 0.00993 | NA |
| naphthalene | 500 | 0.00121 | NA | 0.00061 | NA |
| propionaldehyde | NA | 0.01292 | NA | 0.00651 | NA |
| propylene | NA | 0.03560 | NA | 0.01814 | NA |
| styrene | 215,000 | 0.00084 | NA | 0.00043 | NA |
| toluene | 37,000 | 0.02142 | NA | 0.01119 | NA |
| xylenes | 435,000 | 0.01553 | NA | 0.00816 | NA |
| aluminum | 2,000 | NA | 1.25986 | NA | 1.24273 |
| ammonium | 18,000 | NA | 0.02603 | NA | 0.00713 |
| antimony | 500 | NA | 0.00051 | NA | 0.00030 |
| arsenic | 10 | NA | 0.00037 | NA | 0.00034 |
| barium | 500 | NA | 0.09907 | NA | 0.09632 |
| bromine | 700 | NA | 0.00070 | NA | 0.00059 |
| cadmium | 5 | NA | 0.00080 | NA | 0.00057 |
| chlorine | 1,500 | NA | 0.07096 | NA | 0.06844 |
| chromium | 5 | NA | 0.00027 | NA | 0.00027 |
| cobalt | 20 | NA | 0.00190 | NA | 0.00182 |
| copper | 1,000 | NA | 0.02017 | NA | 0.01976 |
| lead | 50 | NA | 0.00976 | NA | 0.00940 |
| manganese | 200 | NA | 0.01826 | NA | 0.01780 |
| mercury | 25 | NA | 0.00048 | NA | 0.00031 |
| nickel | 500 | NA | 0.00223 | NA | 0.00210 |
| phosphorus | 100 | NA | 0.02785 | NA | 0.02680 |
| selenium | 200 | NA | 0.00015 | NA | 0.00010 |
| silicon | 5,000 | NA | 3.35708 | NA | 3.30019 |
| silver | 10 | NA | 0.00033 | NA | 0.00017 |
| sulfates | NA | NA | 0.28872 | NA | 0.19037 |
| thallium | 100 | NA | 0.00000 | NA | 0.00000 |
| vanadium (fume or dust) | 50 | NA | 0.00562 | NA | 0.00538 |
| zinc | NA | NA | 0.01545 | NA | 0.01288 |

NOTES:

1/ All TACs for which PEL-TWAs are available are listed. PEL-TWAs are not available for 2,2,4-trimethylpentane, ethylene, isoprene, propionaldehyde, propylene, sulfates, zinc and diesel exhaust.

2/ California Occupational Safety and Health Administration, *Table AC-1, Permissible Exposure Limits for Chemical Contaminants*, 2008, Available: http://www.dir.ca.gov/title8/5155table_ac1.html.

3/ Concentrations are for Theme Building at grid point 404. Only organics were modeled in 2018 and only particulates were modeled in 2019 for the 8-hour scenarios.

4/ NA = Not Available

SOURCE: CDM Smith, 2017.

PREPARED BY: CDM Smith, 2017.

**Table 4-2: Comparison of CalOSHA Permissible Exposures Limits to Maximum 8-Hour On-Site Air Concentrations During Operation**

| TOXIC AIR CONTAMINANT[1/] | CALOSHA PEL-TWA (UG/M$^3$) [2/] | PROJECT CONCENTRATIONS DURING MAXIMUM 8-HOUR OPERATION (UG/M$^3$) | |
|---|---|---|---|
| | | 2024 WITH PROJECT V. 2024 WITHOUT PROJECT[3/] | 2035 WITH PROJECT V. 2035 WITHOUT PROJECT[3/] |
| 1,2,4-trimethylbenzene | 125,000 | 0.07124 | 0.08526 |
| 1,3-butadiene | 2,200 | -0.02791 | -0.01512 |
| 2,2,4-trimethylpentane | NA[4] | -0.11830 | -0.06408 |
| acetaldehyde | 45,000 | -0.01456 | -0.00789 |
| acrolein | 250 | -0.00667 | -0.00361 |
| benzene | 324 | -0.12679 | -0.06868 |
| cumene | 245,000 | -0.00061 | -0.00033 |
| cyclohexane | 1,050,000 | -0.03155 | -0.01709 |
| ethyl benzene | 22,000 | -0.05399 | -0.02925 |
| ethylene | NA | -0.32698 | -0.17713 |
| formaldehyde | 375 | -0.08129 | -0.04403 |
| hexane | 180,000 | -0.08190 | -0.04436 |
| isoprene, except from vegetative emission sources | NA | -0.00728 | -0.00394 |
| methanol | 260,000 | -0.00607 | -0.00329 |
| methyl ethyl ketone (2-butanone) | 590,000 | -0.00121 | -0.00066 |
| naphthalene | 500 | -0.00243 | -0.00131 |
| propionaldehyde | NA | -0.00182 | -0.00099 |
| propylene | NA | -0.15712 | -0.08511 |
| styrene | 215,000 | -0.00607 | -0.00329 |
| toluene | 37,000 | -0.29544 | -0.16004 |
| xylenes | 435,000 | -0.24691 | -0.13375 |
| aluminum | 2,000 | 0.00601 | 0 |
| ammonium | 18,000 | 0.00016 | 0 |
| antimony | 500 | 0.000004 | 0 |
| arsenic | 10 | 0.0000010 | 0 |
| barium | 500 | 0.00139 | 0 |
| bromine | 700 | 0.000002 | 0.0000007 |
| cadmium | 5 | 0.0000002 | 0 |
| chlorine | 1,500 | 0.00021 | 0.00010 |
| chromium | 5 | 0.000002 | 0.00000003 |
| cobalt | 20 | 0.000002 | 0.0000007 |
| copper | 1,000 | 0.00029 | 0.0000007 |
| lead | 50 | 0.000009 | 0 |
| manganese | 200 | 0.00009 | 0.0000007 |
| mercury | 25 | 0.0000005 | 0 |
| nickel | 500 | 0.00002 | 0.0000007 |
| phosphorus | 100 | 0.0002 | 0 |
| selenium | 200 | 0.0000007 | 0 |
| silicon | 5,000 | 0.01872 | 0 |
| silver | 10 | 0 | 0 |
| sulfates | NA | 0.00161 | 0.00061 |
| thallium | 100 | 0.0000002 | 0 |
| vanadium (fume or dust) | 50 | 0.00002 | 0 |
| zinc | NA | 0.00009 | 0.0000007 |

NOTES:

1/ All TACs for which PEL-TWAs are available are listed. PEL-TWAs are not available for 2,2,4-trimethylpentane, ethylene, isoprene, propionaldehyde, propylene, sulfates, zinc and diesel exhaust.

2/ California Occupational Safety and Health Administration, Table AC-1, Permissible Exposure Limits for Chemical Contaminants, 2008, Available: http://www.dir.ca.gov/title8/5155table_ac1.html.

3/ Concentrations are for the Theme Building at grid point 404. Negative values indicate a decrease compared to Without Project conditions.

4/ NA = Not Available

SOURCE: CDM Smith, 2017.

PREPARED BY: CDM Smith, 2017.

30. The first three paragraphs under Section 4.1.2. Cancer Risks and Chronic Non-Cancer Health Hazards for Maximally Exposed Individuals (MEI) – Residents and School Children on page 4-5 of Appendix F.2 of the Draft EIR is hereby revised as follows:

For *both* the construction *and operations* scenario*s, TAC concentrations were estimated at* 97~~55~~0 grid points were analyzed within the study area in the vicinity of the airport ~~for each construction year from 2017 to 2030~~. These locations are shown on Figure 4-1~~a~~. *Of these 970 locations, 370 are fence line locations at the boundaries of the LAX property. Since no actual receptors are located on the fence line, health risks and hazards were not calculated at the fence line. Impacts from construction were modeled from 2017 to 2027. To best meet requirements of current CalEPA guidance for estimating cancer risks, each year was modeled separately.*

~~Two modeling runs were analyzed for operations – a screening run and a refined run. For the screening operation scenario, 880 grid points were analyzed within the study area in the vicinity of the airport. These locations are shown on Figure 4-1b. The modeling grid for operations was expanded over the construction modeling grid in order to include the nearby roadways so that the potential traffic impacts could be captured by the modeling. For the refined operation scenario, the 550-grid point construction modeling grid was used. Only the results of the refined modeling run are summarized in this section. The results of the screening modeling run are included in the attachments. The operation scenarios were modeled~~ *Incremental impacts from operations were estimated from 2024 to 2035. Emissions for operations were used for modeling TAC concentrations* for two horizon years – 2024 and 2035. ~~To estimate the TAC emissions b~~*B*etween 2024 and 2035, *TAC* concentrations were assumed to change linearly from 2024 to 2035. ~~In addition, risks and hazards for operations were added to the construction risks and hazards, for years for 2024 and beyond.~~ *Beyond 2035, TAC concentrations modeled for 2035 were assumed to remain constant*.

~~Concentrations at these grid point locations represent maximum concentrations of TAC predicted by the air dispersion modeling, can be used to evaluate exposure to a MEI, and thus provide a ceiling for risks and hazards for off-airport residential, commercial, and student receptors. In essence, these calculations assumed that people live, work, and go to school within this study area. This assumption is obviously conservative. No exposures or risks due to emissions from LAX within the community outside of the study area would be higher than those calculated in this HHRA.~~

*TAC concentration estimates allow calculation of health risks and hazards at 600 locations within the study area. Results of these calculations are used in several ways. First, the highest risks and hazards identify locations where maximum exposure may occur for residents and school children. These locations define impacts for Maximally Exposed Individuals (MEI). Which are used in significance determination. Second, risk and hazard estimates define a ceiling for impacts both spatially and in magnitude. The results show where the largest impacts may be realized and over how large an area such impacts might occur. People living within the study area thus have some illustration of impacts predicted for their off-airport location(s). Third, risk and hazard estimates are*

*used to estimate total cancer burden within the study. Cancer burden calculations use these estimates along with census data to calculate the number of cancer cases that might occur in the study area population. Finally, risk and hazard estimates are used to show the amount of risk/hazard reduction associated with mitigation measures. Reductions are illustrated by applying reduced emissions estimates for mitigation to air dispersion modeling and noting changes in TAC concentrations and associated risks/hazards at each grid point locations.*

31. Table 4-3: Incremental Cancer Risks and Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from Proposed Project Construction and Operation on Page 4-6 of Appendix F.2 of the Draft EIR is hereby revised. Please see the following revised table.

**Table 4-3 Incremental Cancer Risks and Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from Proposed Project Construction and Operation**

| | INCREMENTAL CANCER RISKS[1/] (PER MILLION PEOPLE) | | | |
|---|---|---|---|---|
| | CONSTRUCTION | | OPERATION[2/] | |
| RECEPTOR TYPE | UNMITIGATED | MITIGATED | 2024 WITH PROJECT VS. 2024 WITHOUT PROJECT | 2035 WITH PROJECT VS. 2035 WITHOUT PROJECT |
| Adult Resident, 30 years | 16 | 5 | 8 | 8 |
| Child Resident, 9 years | 34 | 6 | 5 | 6 |
| School Child, 12 years | 8 | 2 | 2 | 3 |
| Adult Worker, 25 years | 3 | 1 | 1 | 1 |
| | **INCREMENTAL NON-CANCER CHRONIC HAZARDS[3/]** | | | |
| | CONSTRUCTION | | OPERATION[2/] | |
| RECEPTOR TYPE | UNMITIGATED | MITIGATED | 2024 WITH PROJECT VS. 2024 WITHOUT PROJECT | 2035 WITH PROJECT VS. 2035 WITHOUT PROJECT |
| Residential | NA[4/] | NA[4/] | 0.02 | 0.08 |
| Commercial | NA[4/] | NA[4/] | 0.08 | 0.21 |

NOTES:

1/ Values provided are changes in the number of cancer cases per million people. Values greater than the threshold are in bold.

2/ Values in this table are for the 2024 operations scenario with unmitigated construction. Values for the 2024 operations scenario with mitigated construction (results provided in the attachments) would be less.

3/ Hazard indices are totals for all TACs that may affect the respiratory system. This incremental HI is essentially equal to the total for all TACs.

4/ NA = not applicable. Hazard indices for construction are shown in Table 4-4.

SOURCE: CDM Smith, 2017.
PREPARED BY: CDM Smith, 2017.

32. Table 4-4: Incremental Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from Project Construction on Page 4-6 of Appendix F.2 of the Draft EIR is hereby revised. Please see the following revised table.

**Table 4-4 Incremental Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from Project Construction**

| | INCREMENTAL CHRONIC NON-CANCER HEALTH HAZARDS DURING CONSTRUCTION[1/] | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **RECEPTOR** | **2017** | **2018** | **2019** | **2020** | **2021** | **2022** | **2023** | **2024** | **2025** | **2026** | **2027** |
| **Unmitigated** | | | | | | | | | | | |
| Resident | 0.0006 | 0.04 | 0.03 | 0.04 | 0.04 | 0.04 | 0.007 | 0.03 | 0.03 | 0.03 | 0.04 |
| Worker | 0.008 | 0.21 | 0.24 | 0.08 | 0.10 | 0.11 | 0.04 | 0.09 | 0.09 | 0.08 | 0.09 |
| **Mitigated** | | | | | | | | | | | |
| Resident | 0.0004 | 0.03 | 0.02 | 0.02 | 0.03 | 0.03 | 0.005 | 0.03 | 0.03 | 0.03 | 0.04 |
| Worker | 0.006 | 0.14 | 0.14 | 0.06 | 0.06 | 0.09 | 0.03 | 0.09 | 0.09 | 0.08 | 0.09 |

NOTES:

1/ Includes contribution from Operations starting in 2024. Values rounded to single significant digit.

SOURCE: CDM Smith, 2017.
PREPARED BY: CDM Smith, 2017.

33. The following paragraphs under Section 4.1.2.1 Residents (Adults and Young Children) - Construction starting on page 4-6 of Appendix F.2 of the Draft EIR are hereby revised as follows:

> For the construction scenario, adult and child residents were evaluated at 3*48*~~33~~ residential and residential/commercial grid nodes. Because construction of the proposed Project is estimated to be 1*1*~~4~~ years, incremental cancer risk for the adult resident was estimated assuming 1*1*~~4~~ years of construction and with operation overlapping the construction starting in 2024; following completion of construction, it was assumed that the adult resident was exposed to operations for the remaining 1*9*~~6~~ years of the 30-year exposure period. Since the exposure period for the child resident is 9 years, which is less than the 1*1*~~4~~-year construction scenario, the cancer risk for the child resident was calculated over several periods within the 1*1*~~4~~-year time frame to determine which period would result in the maximum cancer risk for the child resident. It was determined that maximum exposure and cancer risk for the child resident would occur for the 9-year exposure period from 2019 ~~to~~*through* 2027.
>
> Incremental cancer risk for an adult resident at the peak location during construction is estimated to be ~~23~~ *16* in one million for the unmitigated scenario, and ~~9~~ *5* for the mitigated scenario. ~~The~~*Cancer Risks for* unmitigated *emissions*~~scenario~~ is more than the threshold of significance of 10 in one million while ~~the~~ *cancer risk for*~~mitigated~~ *emissions*~~scenario~~ is less than the threshold of

significance of 10 in one million. ~~DPM would contribute to the majority of the cancer risk (94 percent for unmitigated and 42 percent for mitigated) followed by hexavalent chromium, (contributing 34 percent for unmitigated and 49 percent for mitigated).~~ DPM ~~is~~ primarily *associated with exhaust* ~~an emission~~ from diesel construction equipment, haul trucks, and concrete trucks *contributes substantively to total cancer risk (82 percent for unmitigated and 41 percent for mitigated). Mitigation measures aimed at reducing DPM emissions are predicted to be effective in reducing total cancer risk*. ~~The peak locations are shown on Figures 4-2a and 4-2b.~~

*Other chemicals that make notable contributions to total risk include 1,3-butadiene (8 percent for unmitigated and 25 percent for mitigated), benzene (6 percent for unmitigated and 19 percent for mitigated), and hexavalent chromium (3 percent for unmitigated and 10 percent for mitigated). Peak (MEI) locations, based on results in Table 4-3, are shown on Figures 4 2a and 4-2b.*

*Note that the increased percentage contribution of several TAC to total risks does not imply higher concentrations of these TAC after mitigation. Mitigation measures are primarily directed at reducing DPM emissions. When such measures are successful, TAC that are not associated with diesel exhaust and are therefore not materially affected by mitigation measure become relatively more important.*

Incremental cancer risk for a child resident at the peak location during construction is estimated to be ~~54~~ *34* in one million (unmitigated), and ~~12~~ *6* (mitigated)~~, both of which are more~~ *. The unmitigated scenario is more than the threshold of significance of 10 in one million while the mitigated scenario is less* than the threshold of significance of 10 in one million. DPM would contribute the majority of the cancer risk (96~~1~~ percent for unmitigated and ~~66~~ *77* percent for mitigated) followed by *1,3-butadiene (contributing 2 percent for unmitigated and 9 percent for mitigated), benzene (contributing 1 percent for unmitigated and 7 percent for mitigated), and* hexavalent chromium*, (*contributing *1*~~6~~ percent for unmitigated and *6*~~27~~ percent for mitigated*). The source for 1,3-butadiene and benzene are primarily gasoline exhaust emissions from automobiles.* Hexavalent chromium is primarily *associated with* ~~an emission from~~ fugitive dust. Peak *(MEI)* locations are shown on Figures 4-*4-*2c and 4-2d.

As noted in ~~the~~ Section 4.2.1.8 (Air Quality) of the EIR~~, the mitigation measures identified in Section 4.2.1.7 of the EIR were tempered due to recent experience with a lack of available Tier 4 construction equipment. The analysis for mitigated criteria air pollutant impacts assumed that the off-road construction equipment fleet would be 30 percent USEPA Tier 3 compliant, 35 percent Tier 4 Interim compliant, and 35 percent Tier 4 Final compliant. Fifty percent of the USEPA Tier 3 compliant equipment was also assumed to be fitted with Level 3 VDECS diesel particulate filters. In addition, LAWA is committing to using 90 percent renewable diesel fuel in construction equipment per MM-AQ (LAMP)-1. Applying these mitigation assumptions to the construction health risk impacts resulted substantial reductions in cancer risks; however, the child resident was still estimated to have a cancer risk of approximately 12 per million, above the 10 per million significance threshold. Therefore,~~ LAWA is committ*ed*~~ing~~ to a mitigation program that will result

in 40 percent of the off-road construction equipment used on the project meeting Tier 4 Final standards, 40 percent meeting Tier 4 Interim Standards, and the remaining 20 percent meeting Tier 3 standards – with 50 percent of Tier 3 compliant equipment installed with Level 3 VDECS particulate filters *and using 90 percent renewable diesel fuel in construction equipment per MM-AQ (LAMP)-1.* ~~Implementation of this additional mitigation is estimated to reduce the child resident cancer risk to approximately 9 per million, below the 10 per million significance threshold.~~

Project-related chronic non-cancer hazard indices for construction impacts associated with the proposed Project ~~are provided in Table 4-4. Hazard indices~~ for each year of construction would range from 0.00*06*~~3~~ in 2017 to 0.*04*~~29~~ in 202*1*~~6~~ for a resident living at the peak TAC concentration location under the unmitigated scenario for a single year of construction~~ of the proposed Project (Table 4-4)~~. *Since non-cancer hazard estimates are proportional to dose rate over a chronic time frame[35], no combination of years during construction will result in a hazard index greater than the maximum one year estimate. HI estimates would be averaged to calculate a chronic value, resulting in chronic HI less than the maximum 1-yr value.*

Non-cancer hazard indices for adult residents and child residents are the same because the OEHHA methodology does not normalize hazard indices to body weight. All incremental chronic non-cancer health hazards for residential adults and for young children are predicted to be below the significance threshold of 1. At the peak HI location in 202*1*~~6~~, hazard indices are primarily attributable to *DPM (45 percent),* silicon (4~~1~~*19* percent) and barium (*8*~~1~~7 percent) and to a lesser extent to ~~aluminum, nickel, and~~ chlorine (~~all~~ 8*7* percent)*, cobalt and nickel (both 5 percent),* and manganese *and aluminum* (both *4*~~7~~ percent). Silicon and chlorine are components of construction dust.

Hazard indices for each year of construction would range from 0.0*00*4 in 201*7*~~8~~ to 0.*04*~~28~~ in 202*7*~~6~~ for a resident living at the peak TAC concentration location under the mitigated scenario. All incremental chronic non-cancer health hazards for residential adults and for young children are predicted to be below the significance threshold of 1. At the peak HI location in 202*7*~~6~~, hazard indices are primarily attributable to silicon (*44*~~2~~ percent) and barium (*16*~~8~~ percent) and to a lesser extent chlorine (*10*~~9~~ percent), ~~and~~ aluminum *(9 percent),* and nickel (~~both~~ 8 percent). Since all hazard indices are less than 0.5, no figure was generated for the chronic non-cancer hazard indices.

[35] EPA defines chronic as an exposure lasting for 7 years or longer.

34. The following paragraphs under *Operations* on page 4-8 of Appendix F.2 of the Draft EIR are hereby revised as follows:

For impacts due to operational emissions, residents were evaluated at 3*48*~~33~~ off-airport grid nodes. Comparison of 2024 With Project vs. 2024 Without Project indicates an incremental cancer risk for a child resident assuming a 9-year exposure scenario of ~~8~~ *5* in one million, and an incremental cancer risk for an adult resident assuming a 30-year exposure scenario of 8 in one

million. These estimates are below the threshold of significance of 10 in one million for the Proposed Project. *1,3-Butadiene*~~DPM~~ would contribute to the majority of the cancer risk (~~79~~ *46* percent for a child and *44*~~73~~ percent for an adult), followed by ~~hexavalent chromium~~*benzene, (*contributing ~~5~~*35* percent for a child and *33*~~8~~ percent for an adult*), and hexavalent chromium (contributing 35 percent for a child and 6 percent for an adult). DPM contributes 5 percent for a child and 4 percent for an adult to the cancer risk due to mitigation measures for this TAC.* ~~The~~ ~~p~~*P*eak location*s are*~~is~~ shown on Figures 4-3a and 4-3b.

Comparison of 2035 With Project vs. 2035 Without Project for project operations, indicates an incremental cancer risk for a child resident of *6*~~3~~ in one million, and an incremental cancer risk for an adult resident of *8*4 in one million. These estimates are below the threshold of significance of 10 in one million. *1,3-Butadiene* ~~Hexavalent chromium~~ would contribute to the majority of the cancer risk (~~87~~ *40* percent) followed by *benzene*~~DPM,~~ *(*contributing ~~7~~ *30* percent*) and hexavalent chromium (contributing 21 percent). DPM contributes 2 percent to the cancer risk.* This peak location is shown on Figure 4-3c and 4-3d.

Project-related chronic non-cancer hazard indices for residents are estimated to be 0.*0*2~~6~~ when comparing 2024 With Project vs. 2024 Without Project and 0.*08*~~26~~ when comparing 2035 Project vs. 2035 Without Project. For 2024 With Project vs. 2024 Without Project at the peak HI location, hazard indices are primarily attributable to *benzene*~~silicon~~ (4*3*4 percent) and *acrolein*~~barium~~ (19 percent) and to a lesser extent to ~~nickel, and~~ *1,3-butadien*e~~aluminum~~ (~~each 9~~ *14* percent)*, formaldehyde* ~~and chlorine~~ *(9 percent)* and *1,2,4-trimethylbenzene*~~manganese~~ (~~each~~ 7 percent). Comparing 2035 With Project vs. 2035 Without Project at the peak HI location, hazard indices are primarily attributable to silicon (4*6*4 percent) and barium (~~19~~ *20* percent) and to a lesser extent to nickel and aluminum (both 9 percent)~~, and~~ manganese *(7 percent),* and chlorine (~~both 7~~*5* percent). Project-related chronic non-cancer health hazards for adult workers for the proposed Project are predicted to be below the threshold of significance. Since all hazard indices are less than 0.5, no figure was generated for the chronic non-cancer hazard indices.

35. The following paragraphs under Section 4.1.2.2 School Children - Construction starting on page 4-8 of Appendix F.2 of the Draft EIR are hereby revised as follows:

For the construction scenario, school children were evaluated at 3*48*~~33~~ residential and residential/commercial grid nodes under a 12-year exposure scenario. Because construction of the proposed Project is estimated to be 1*1*4 years, incremental cancer risk for the school child was estimated assuming 1*1*~~2~~ years of construction and with years of operation overlapping the construction starting in 2024 *and ending a year after construction is complete.* Calculations ~~indicated that the peak 12-year exposure period~~ for the school child *were*~~as~~ 201*7*~~9~~ to 2028~~30~~.

Incremental cancer risk for children attending schools at the peak location within the study area is estimated to be ~~13~~ *8* in one million (unmitigated)~~, which exceeds the threshold of significance of 10 in one million;~~ and ~~4~~ *2* in one million (mitigated)*;*~~,~~ *both are*w~~hich is~~ less than the threshold of

significance *of 10 in one million*. DPM would contribute to the majority of the cancer risk (~~88~~ *94* percent for unmitigated and *69*~~51~~ percent for mitigated) followed by *1,3-butadiene (contributing 3 percent for unmitigated and 12 percent for mitigated), benzene (contributing 2 percent for unmitigated and 9 percent for mitigated), and* hexavalent chromium, contributing *1*~~9~~ percent for unmitigated and *7*~~40~~ percent for mitigated. These peak locations are shown on Figures 4 4a and 4-4b.

Grid locations that were evaluated include all locations where current land use is residential or residential/commercial ~~locations~~. In theory, ~~-~~schools could be constructed in these areas in the future. Schools do not currently exist at almost all of these locations. The ~~closest~~ existing school *closest to the LAX boundary is*~~within the study area would be~~ Oak Street Elementary School; this location is also shown on Figures 4 4a and 4-4b. Incremental cancer risk for children attending school at this locations for 12 years is estimated to be ~~8~~ *3* in one million (unmitigated) and *0.6*~~2~~ in one million (mitigated), both of which are less than the threshold of significance of 10 in one million. Impact estimates at all other existing school locations are less than estimates for Oak Street Elementary. Since the school is an elementary school that provides instruction for children from kindergarten through sixth grade (i.e., 7 years), actual exposure for the school child would be less than the 12-year exposure scenario that was modeled. ~~Based on the 2015~~ *As previously noted,* OEHHA Guidance methodology for calculating chronic non-cancer HI, ~~the~~ hazard*s* ~~calculation~~ for school children would not be different from ~~the~~ hazard*s* ~~calculation~~ for child residents.

36. The following paragraphs under the *Operations* heading starting on page 4-9 of Appendix F.2 of the Draft EIR are hereby revised as follows:

Comparing 2024 With Project vs. 2024 Without Project for project operations, incremental cancer risk for a school child assuming a 12-year exposure scenario is estimated to be *2*~~3~~ in one million, which is below the threshold of significance of 10 in one million*. 1,3-Butadiene* ~~DPM~~ would contribute to the majority of the cancer risk (*46*~~81~~ percent), followed by *benzene*~~hexavalent chromium~~, contributing *35*~~5~~ percent*, and hexavalent chromium, contributing 10 percent. DPM only contributes 3 percent to the cancer risk.* This peak location is shown on Figure 4-5a.

Grid locations that were evaluated include all locations where current land use is residential or residential/commercial locations because schools could be constructed in these areas in the future. Schools do not currently exist at almost all of these locations. The closest existing school is Oak Street Elementary School; this location is also shown on Figure 4-5a. Incremental cancer risk for children attending school *at this location*~~within the study area~~ for 12 years ~~-~~is estimated to be 0.*3*~~1~~ in one million, which is less than the threshold of significance of 10 in one million. Cancer risk estimates at all other existing school locations within the study *area* are less than 0.*3*~~1~~ in one million. Since the school is an elementary school that provides instruction for children from kindergarten through sixth grade (i.e., 7 years), actual exposure for a child at this facility would likely be less than the 12-year exposure scenario that was modeled.

Comparing 2035 With Project vs. 2035 Without Project for project operations, an incremental cancer risk for a school child assuming a 12-year exposure scenario is estimated to be *3*~~1~~ in one million, which is below the threshold of significance of 10 in one million. *1,3-Butadiene* ~~Hexavalent chromium~~ would contribute to the majority of the cancer risk (~~87~~ *40* percent) followed by *hexavalent chromium*~~DPM~~ (contributing ~~7~~ *30* percent) *and hexavalent chromium (contributing 21 percent). DPM contributes 2 percent to the cancer risk.* The~~is~~ peak location is shown on Figure 4-5b.

37. The following paragraphs under the Section 4.1.2.3 Adult Workers - Construction heading starting on page 4-10 of Appendix F.2 of the Draft EIR are hereby revised as follows:

Adult workers were evaluated at 3*67*~~38~~ off-airport grid nodes and 2 on-airport grid nodes. Because the exposure period of the adult worker is 25 years and construction of the proposed Project is estimated to be 1*1*4 years, incremental cancer risk for the worker was estimated assuming 7 years of construction, *4*~~7~~ years of construction and operations (with incremental impacts decreasing linearly from 2024 toward 2035 estimates*)*, *7*4 years of operations only (with incremental impacts changing linearly along the path from 2024 to 2035), and 7 years of operations only (with incremental impacts equal to 2035 estimates).[36]

Cancer risks for adult workers at the peak location are estimated to be *4*~~3~~ in one million (unmitigated) and ~~2~~ *1* in one million (mitigated). DPM would contribute to the majority of the cancer risk (*71*~~87~~ percent for unmitigated and ~~54~~ *27* percent for mitigated) followed by *1,3-butadiene (contributing 14 percent for unmitigated and 34 percent for mitigated), benzene (contributing 10 percent for unmitigated and 26 percent for mitigated), and* hexavalent chromium (*3*~~11~~ percent for unmitigated and ~~40~~ *8* percent for mitigated). Overall, project-related cancer risks for the proposed Project for adult workers are predicted to be below the threshold of significance (10 in one million). Peak locations are shown on Figures 4 6a and 4-6b.

As previously discussed, health impacts are estimated on a year-by-year basis to account for varying emission rates and source locations during the construction period. Chronic exposure is typically defined as exposure lasting 7 years or longer, and yearly estimates are not reflections of the potential for non-cancer health impacts. Further, unlike evaluation of cancer risks, non-cancer hazards are based on average daily dose, rather than on cumulative lifetime dose. Thus, the most appropriate way to estimate non-cancer hazards is to develop an average exposure concentration over the period of construction. However, examining yearly HI estimates can provide initial screening. If the highest yearly HI estimates are less that the regulatory threshold of 1, then any average exposure rate encompassing years with lower HI estimates will also be less than 1. This screening approach was used in the discussion of HI estimates for adult workers.

Project-related chronic non-cancer hazard indices for construction impacts associated with the proposed Project are provided in Table 4 4. Hazard indices shown for each year of construction would range from 0.0*08*~~1~~ in 2017 to 0.*24*~~5~~ in 20*19*~~20~~ for an adult worker at the peak TAC concentration location (unmitigated) for a single year of construction. All incremental chronic

non-cancer health hazards for adult workers are predicted to be below the significance threshold of 1. At the peak HI location for 20*19*~~20~~, hazard indices are primarily attributable to ~~silicon~~ *DPM* (*49*~~39~~ percent) and to a lesser extent to ~~DPM, cobalt, and chlorine~~*silicon* (~~each~~ 1*6*~~1~~ percent), and ~~aluminum~~ barium (*10*~~9~~ percent). Silicon ~~and chlorine are~~*is a* components of construction dust. Since even peak HI estimates are less than one, HI estimates for any chronic time frame will also be less than one and the screening analysis is sufficient to demonstrate lack of significant impact.

Hazard indices shown for each year of construction would range from 0.00*6*~~5~~ in 2017 to 0.*14*~~42~~ in 20*19*~~20~~ for an adult worker at the peak TAC concentration location (mitigated) for a single year of construction. All incremental chronic non-cancer health hazards for adult workers are predicted to be below the significance threshold of 1. At the peak HI location for 20*19*~~20~~, hazard indices are primarily attributable to silicon (*29*~~45~~ percent) and to a lesser extent to *barium*~~cobalt and chlorine~~ (~~both~~ 1*3*~~2~~ percent), *benzene (9 percent),* and *chlorine*~~aluminum~~ *and DPM* (*both* ~~10~~*7* percent). Since all hazard indices are equal to or less than 0.5, no figure was generated for the chronic non-cancer hazard indices. Since even peak HI estimates are less than one, HI estimates for any chronic time frame will also be less than one and the screening analysis is sufficient to demonstrate lack of significant impact.

[36] Recall that the project time line is divided into three parts – an initial construction period of 7 years from 2017 to 2024, a middle period from 2024 to 20*27*~~31~~ where construction continues and airport-related operations associated with the proposed project are realized and an operations only period starting in 20*28*~~31~~. To estimate impacts during the period from 2024 to 2035, incremental operational emissions are assumed to *change*~~decrease~~ linearly with time. These incremental emission estimates are calculated as the difference between proposed Project and No Project emissions in both 2024 and 2035.

38. The following paragraphs under the *Operations* heading starting on page 4-11 of Appendix F.2 of the Draft EIR are hereby revised as follows:

Comparing 2024 With Project vs. 2024 Without Project for project operations, incremental cancer risk for a worker assuming a 25-year exposure scenario is estimated to be 1 in one million, which is below the threshold of significance of 10 in one million. *1,3-Butadiene*DPM would contribute to the majority of the cancer risk (~~60~~ *47* percent) followed by *benzene (contributing 36 percent) and* hexavalent chromium~~,~~ *(*contributing ~~31~~ *8* percent*). DPM contributes 1 percent to the cancer risk.* This peak location is shown on Figure 4-7a.

Comparing 2035 With Project vs. 2035 Without Project for project operations, incremental cancer risk for a worker assuming a 25-year exposure scenario is estimated to be ~~0.8~~*1* in one million, which is below the threshold of significance of 10 in one million. *1,3-Butadiene* ~~Hexavalent chromium~~ would contribute to the majority of the cancer risk (~~74~~ *38* percent) followed by *benzene (contributing 29 percent) and hexavalent chromium*~~DPM,~~ *(*contributing 2*5*~~3~~ percent). *DPM contributes 1 percent to the cancer risk.* This peak location is shown on Figure 4-7b.

Project-related cancer risks for workers are predicted to be below the threshold of significance for the proposed Project for operations for horizon year 2024 and for horizon year 2035.

Project-related incremental chronic non-cancer hazard indices for adult workers are estimated to be 0.*08*~~26~~ when comparing 2024 With Project vs. 2024 Without Project and 0.2*1*~~8~~ when comparing 2035 With Project vs. 2035 Without Project. Under 2024 Project vs. 2024 Without Project at the peak HI location, hazard indices are primarily attributable to silicon (4*8*~~2~~ percent) and barium (*21*~~19~~ percent) and to a lesser extent to nickel *(10 percent),* ~~and~~ *aluminum* ~~chlorine~~ (~~both~~ 9 percent), and *chlorine* ~~aluminum~~ (8 percent). For 2035 With Project vs. 2035 Without Project at the peak HI location, hazard indices are primarily attributable to silicon (45 percent) and barium (19 percent) and to a lesser extent to nickel (9 percent), aluminum (9 percent) and manganese (7 percent). Project-related chronic non-cancer health hazards for adult workers for the proposed Project are predicted to be below the threshold of significance. Since all hazard indices are less than 0.5, no figure was generated for the chronic non-cancer hazard indices. Note again that single year HI estimates are used for screening. When peak HI estimates do not exceed the regulatory threshold of 1, no longer term (chronic) exposures will result in HI estimates above 1.

39. The following paragraphs under Section 4.1.3 Acute Non-Cancer Health Hazards starting on page 4-12 of Appendix F.2 of the Draft EIR are hereby revised as follows:

Land use distinctions and different exposure scenarios are irrelevant for assessment of acute non-cancer health hazards. For example, someone visiting a commercial establishment ~~would potentially~~*at the time when TAC concentrations are maximal would* be subject to the same acute non-cancer health hazards as someone working at the establishment. ~~For the acute non-cancer health hazards analysis, all of the~~ *Even so, land use distinctions among* grid points were ~~distinguished by their receptor type although the calculation for the acute non-cancer health hazard was the same.~~*retained in the analysis.* Retaining land use designations puts some perspective on who ~~might be subject~~*is most likely* to ~~exposure to the highest~~*be exposed when* short-term concentrations of TAC *are highest*.

*Construction*

Acute non-cancer health hazards were evaluated for two peak emission years of construction – 201*8*~~9~~ and 20*19*~~20~~. The year 201*8*~~9~~ is ~~estimated~~*anticipated* to have the *highest DPM emissions*~~peak diesel exhaust sources~~ and the year 20*19*~~20~~ is ~~estimated~~*anticipated* to have the ~~peak construction~~ *highest* dust emissions ~~for particulate matter~~. ~~In general, the peak years have nearly twice the emissions of the next closest year.~~ *Two on-airport locations were assumed to be commercial receptors (workers), that is, workers not involved in proposed Project construction.* ~~All h~~*H*azards quotients ~~due to~~ *estimated for* acute exposure are ~~equal to or~~ below 1 for all evaluated on-site and off-site grid *locations*~~nodes~~ within the study area whether evaluated with or without mitigation. ~~Two on-airport grid points were assumed to be commercial receptors (workers).~~ Hence, no acute non-cancer health impacts are expected from construction of the proposed Project. A HI equal to or greater than 1 would indicate the potential for acute adverse health effects.

*Maximum acute non-cancer health hazards associated with exposure to manganese, benzene, and formaldehyde associated with emissions from the proposed Project construction are summarized in Table 4 5. Peak locations are shown in Figure 4-8a. Calculations are provided in Attachment 2 to this memorandum.*

~~For an off-site worker, a hazard quotient for acute exposure to manganese construction is equal to 1 (unmitigated) at the location of maximum impact: all other hazard quotients are less than 1. The acute REL for manganese is set at or below a level at which no adverse health impacts are expected for the majority of the population and includes an uncertainty factor of 300. Hence, no health impacts are expected. Also, note that the target organ for acute toxicity of manganese is the nervous system and its actions would not be expected to be additive to the effects of formaldehyde which target the respiratory system.~~ Formaldehyde, *benzene,* and manganese are the ~~only~~ *TACs*~~c~~chemicals~~s~~ with *the highest* acute HI estimates*, all less than* ~~close to~~ the threshold of one. *Note that the target organ for acute toxicity of manganese is the nervous system and its actions would not be expected to be additive to the effects of formaldehyde which target the respiratory system, nor to the effects of benzene, which could result in developmental impacts and impacts to the immune and hematologic systems.* ~~No additive impacts from exposure to manganese and other site related TAC are expected.~~

*Only organic chemicals were modeled in 2018 and only particulates were modeled in 2019, total acute non-cancer health hazards cannot be summed for each location. However, to provide relative contributions,* ~~F~~*f*ormaldehyde and *benzene* ~~manganese are responsible for~~*contribute* ~~5~~ *45* to ~~47~~*66*% and ~~30~~*29* to *51*~~84~~%, respectively, of *the total of* all *maximum* predicted acute non-cancer health hazards *for organics* before mitigation. *Manganese*~~Benzene~~ and nickel contribute *79*~~2~~ to *85*~~14~~% and *10*~~4~~ to *15*~~7~~%, respectively, *of*~~to~~ the total *of all maximum* acute non-cancer health hazard*s for particulates*.

Acrolein is only responsible for 0.*5*~~04~~ to ~~0.4~~*2*% of all predicted acute non-cancer health hazards *for organics* (unmitigated). Acrolein results are mentioned here for informational purposes because it has historically been a TAC of concern for acute non-cancer health hazards for other LAX projects. Current estimates of emissions and air concentrations are too low for this TAC to be of concern for the proposed Project.

~~Maximum acute non-cancer health hazards associated with exposure to manganese and formaldehyde associated with emissions from the proposed Project construction are summarized in Table 4 5. Peak locations are shown in Figure 4-8a. Calculations are provided in Attachment 2 to this memorandum.~~

40. Table 4-5: Range of Incremental Acute Non-Cancer Hazard Indices for Project Construction for 2018 and 2019 on Page 4-13 of Appendix F.2 of the Draft EIR is hereby revised. Please see the following revised table.

**Table 4-5: Range of Incremental Acute Non-Cancer Hazard Indices for Project Construction for 2018~~9~~ and 2019~~20~~**

| RECEPTOR TYPE | SUMMARY OF INCREMENTAL ACUTE NON-CANCER HAZARD INDICES | | | | | |
|---|---|---|---|---|---|---|
| | MANGANESE | | BENZENE | | FORMALDEHYDE | |
| | UNMITIGATED | MITIGATED | UNMITIGATED | MITIGATED | UNMITIGATED | MITIGATED |
| | 2019[1/] | 2019[1/] | 2018[1/] | 2018[1/] | 2018[1/] | 2018[1/] |
| On-Site Worker | | | | | | |
| Maximum HI[2/] | 0.2 | 0.2 | 0.009 | 0.008 | 0.008 | 0.004 |
| Average HI | 0.1 | 0.1 | 0.006 | 0.005 | 0.005 | 0.003 |
| Minimum HI | 0.02 | 0.02 | 0.002 | 0.001 | 0.003 | 0.001 |
| | | | | | | |
| Off-Site Worker | | | | | | |
| Maximum HI | 0.2 | 0.2 | 0.03 | 0.03 | 0.05 | 0.02 |
| Average HI | 0.03 | 0.03 | 0.004 | 0.003 | 0.006 | 0.003 |
| Minimum HI | 0.001 | 0.001 | 0.0002 | 0.0001 | 0.0003 | 0.0001 |
| | | | | | | |
| Residential | | | | | | |
| Maximum HI | 0.09 | 0.09 | 0.01 | 0.008 | 0.02 | 0.01 |
| Average HI | 0.008 | 0.008 | 0.001 | 0.0008 | 0.002 | 0.0009 |
| Minimum HI | 0.0008 | 0.0007 | 0.00007 | 0.00005 | 0.0001 | 0.00006 |

NOTES:

1/ Only organics (e.g., benzene and formaldehyde) were modeled in 2018 and only particulates (e.g., manganese) were modeled in 2019 for the acute 1-hour scenarios.

2/ HI = Hazard Index

SOURCE: CDM Smith, 2017.
PREPARED BY: CDM Smith, 2017.

41. The first two paragraphs under the *Operations* heading starting on page 4-13 of Appendix F.2 of the Draft EIR is hereby revised as follows:

> Acute non-cancer health hazards were evaluated for each horizon year of operations in 2024 and 2035. *Emission contributions from construction were included for the construction years 2024 to 2027.* All hazards quotients due to acute exposure are below regulatory threshold of 1 for all evaluated on-site and off-site grid nodes within the study area of the proposed Project. Hence, no acute non-cancer health impacts are expected from projected operational emissions.

*Benzene and acrolein contribute 22 to 48%, and 13 to 75%, respectively, of the total of all maximum acute non-cancer health hazards under operations.* Nickel and manganese *contribute*~~are responsible for 13.21~~ to *62*~~13.5~~%, and *7*~~76.4~~ to *48*~~79.1~~%, respectively, of *the total of* all ~~predicted~~ *maximum* acute non-cancer health hazards under operations. ~~As with construction, acrolein is a minor contributor (0.8 to 1.6% of all predicted acute non-cancer health hazards (mitigated)) and is not anticipated to represent and acute health hazard.~~ Calculations are provided in Attachment 2 to this memorandum.

42. The first two paragraphs under Section 4.2 Population-Wide Risks (Cancer Burden) starting on page 4-14 of Appendix F.2 of the Draft EIR are hereby revised as follows:

Some incremental MEI cancer risk estimates exceed the regulatory threshold of 10 in one million *prior to consideration of mitigation measures*. When such results are realized, CalEPA guidance requires an estimate of population level risks. These estimates are protective estimates of the number of cancer cases that could occur in the exposed population. If more than 0.5 cases are estimated *in an exposed population*, the impact is determined to be significant.

To determine the population-wide risks, Project-related *individual* risks for construction and operation impacts (unmitigated and mitigated) were evaluated for a 70-year residential scenario. *Risks were again calculated at each grid point location.*

Cancer burden for resident~~s~~ population ~~risks~~ for construction impacts associated with the proposed Project are provided in Table 4-6. Cancer risk isopleths to identify the 1 in a million zone of impact along with the peak locations for unmitigated and mitigated construction are shown on Figures 4-9a and 4-9b, respectively; similarly, 2024 and 2035 operations are shown on Figures 4-10a and 4-10b, respectively.

43. Table 4-6: Incremental Cancer Risks and Cancer Burdens for Maximally Exposed 70-Year Resident from Project Construction and Operation on Page 4-14 of Appendix F.2 of the Draft EIR is hereby revised. Please see the following revised table.

**Table 4-6: Incremental Cancer Risks and Cancer Burdens for Maximally Exposed 70-Year Resident from Project Construction and Operation**

| | INCREMENTAL CANCER RISK AND BURDEN[1/] (PER MILLION PEOPLE) | | | |
|---|---|---|---|---|
| | CONSTRUCTION | | OPERATION[2/] | |
| RECEPTOR TYPE | UNMITIGATED | MITIGATED | 2024 WITH PROJECT VS. 2024 WITHOUT PROJECT | 2035 WITH PROJECT VS. 2035 WITHOUT PROJECT |
| Resident, 70 years Cancer Risk | **17** | **6** | **9** | **10** |
| | CANCER BURDENS BY ZONE OF IMPACT | | | |
| within 100 in a million ($10^{-4}$) | 0.0 | 0.0 | 0.0 | 0.0 |
| within 10 in a million ($10^{-5}$) | 0.02 | 0.0 | 0.0 | 0.0 |
| within 1 in a million ($10^{-6}$) | 0.1 | 0.01 | 0.01 | 0.01 |
| within 0.1 in a million ($10^{-7}$) | 0.2 | 0.02 | 0.02 | 0.02 |

NOTES:

1/ Cancer Risk values provided are changes in the number of cancer cases per million people. Values greater than the threshold are in bold.

2/ Values in this table represent screening operations cancer risks. Refined operation results would be less than screening operations cancer risks.

SOURCE: CDM Smith, 2017.
PREPARED BY: CDM Smith, 2017.

44. The last two paragraphs under Section 4.2 Population-Wide Risks (Cancer Burden) starting on page 4-14 of Appendix F.2 of the Draft EIR are hereby revised as follows:

> Incremental cancer risk for 70-year residential scenarios is greater than the threshold of 10 in a million *for unmitigated construction*, yet cancer burden within the zone of impact of 1 in a million (10-6) is below the threshold of significance of 0.5. This finding reflects the relatively small area where cancer risks exceed the threshold. A small area equates to an impact to a small population, which in turn has a small impact on total cancer burden.
>
> Because all incremental chronic non-cancer health hazards for residents are below 1, population-level estimates for non-cancer health impacts were not estimated. The same is true for acute health hazards. ~~Manganese was the only TAC with an acute HQ near but not above the threshold of 1. As noted previously, the target end point for manganese is the nervous system, which is not the same as the target end point for formaldehyde that effects the respiratory system. Health hazards for manganese are not additive with the respiratory hazards associated with the only other TAC that contributes substantively to hazards estimates.~~

45. Table 4-7: Comparison of Incremental Cancer Risks and Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from Mitigated Project Construction to the Concurrent Projects of Bradley

West and CUP-RP on Page 4-17 of Appendix F.2 of the Draft EIR is hereby revised. Please see the following revised table.

**Table 4-7: Comparison of Incremental Cancer Risks and Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from Mitigated Project Construction to the Concurrent Projects of Bradley West and CUP-RP**

| | INCREMENTAL CANCER RISKS[1/] (PER MILLION PEOPLE) | |
|---|---|---|
| **RECEPTOR TYPE** | **PROPOSED PROJECT** | **CONCURRENT PROJECTS FOR BRADLEY WEST AND CUP-RP[3/]** |
| Child Resident | 6 | 9 |
| School Child | 2 | 0.8 |
| Adult Resident | 5 | 31 |
| Adult Worker | 1 | 31 |
| **RECEPTOR TYPE** | **INCREMENTAL NON-CANCER CHRONIC HAZARDS[2/]** | |
| Resident | 0.04 | 0.09 |
| Worker | 0.14 | 0.09 |

NOTES:

1/ Values provided are changes in the number of cancer cases per million people exposed as compared to baseline conditions. All estimates are rounded to one significant figure.

2/ Hazard indices are totals for all TACs that may affect the respiratory system. This incremental HI is essentially equal to the total for all TACs. Only the hazard for the peak year during the construction period is shown.

3/ Includes Bradley West Project (Taxiway S and ARFF demolition, both Bradley West Project construction and operation), Crossfield Taxiway Project, Airfield Operating Area (AOA) Perimeter Fence Enhancements - Phase III, Security Program - In-Line Baggage Screening Systems (T6), TBIT Interior Improvements Program, Airfield Intersection Improvements - Phase 2, Airport Operations Center (AOC)/Emergency Operation Center (EOC), K-9 Training Facility, Central Utilities Plant Replacement Program (CUP-RP), Passenger Boarding Bridge Replacement, Bus Wash Rack Facility, CTA Elevators and Escalators Replacement, CTA Seismic Retrofits, Sewer Line Replacement, CTA Joint Repair, Roadway Improvements, and Security Barriers, Korean Air Cargo Terminal Improvement Project, West Aircraft Maintenance/Aircraft Parking Area, Westchester Golf Course 3-Hole Expansion Project, Westchester Rainwater (Stormwater) Improvement Project, and Metro Bus Maintenance and Operations Facility.

SOURCE: CDM Smith, 2017.
PREPARED BY: CDM Smith, 2017.

46. The first two paragraphs under Section 4.3.2 Cumulative Chronic Non-Cancer Health Hazards starting on page 4-17 of Appendix F.2 of the Draft EIR are hereby revised as follows:

Acrolein is the TAC of concern that is responsible for the majority of all predicted chronic non-cancer health hazards associated with LAX operations. However, for the proposed Project construction, chronic non-cancer health hazards are primarily attributable to *DPM,* silicon and barium, and to a lesser extent chlorine, *benzene,* aluminum, nickel, cobalt, and manganese. In 2015, USEPA published an independent study of possible annual average air concentrations within the South Coast Air Basin associated with a variety of TAC, including acrolein, chlorine, and DPM (silicon and barium were not included). These estimates provide a means for assessing

cumulative chronic non-cancer health hazard impacts of airport operations in much the same manner as cumulative cancer risks were assessed using the MATES-IV results.

Within Los Angeles County, USEPA predictions for annual average concentrations yield acrolein hazard indices by census tract ranging from 0.1 to 11, with an average of 2; DPM hazard indices ranging from 0.005 to 0.5, with an average of 0.1; and chlorine hazard indices ranging from 0.003 to 0.2, with an average of 0.06. Incremental hazard indices for the proposed Project (Table 4-~~4~~*2*) were estimated to range from 0.00*06*~~3~~ to 0.*24*~~5~~, all below the threshold of significance of one. Given the relatively small hazard indices associated with proposed Project emissions, the project is not expected to add significantly to cumulative chronic non-cancer health hazards.

47. The first paragraph under Section 4.3.3 Cumulative Acute Non-Cancer Health Hazards starting on page 4-18 of Appendix F.2 of the Draft EIR is hereby revised as follows:

~~Acrolein, f~~*F*ormaldehyde, *benzene,* and manganese are the primary TAC of concern in proposed Project emissions that might be present at concentrations approaching the threshold for acute non-cancer health hazards. Predicted concentrations of TAC released from construction activities f estimate that acute non-cancer health hazards ~~would be~~ *are* below the significance threshold of one.

48. The second sentence of the second paragraph on page 4-19 of Appendix F.2 of the Draft EIR is hereby revised as follows:

Predicted overall maximum incremental acute non-cancer health hazards for the proposed Project associated with ~~acrolein~~ *benzene* ranged from 0.0000*5*~~6~~ to 0.0~~0~~3; associated with formaldehyde ranged from 0.000*06*~~8~~ to 0.*05*~~2~~; and associated with manganese ranged from 0.00*07*~~3~~ to *0.2*~~1~~.

49. The two paragraphs under Section 4.3.4 Conclusions on page 4-19 of Appendix F.2 of the Draft EIR is hereby revised as follows:

Although no defined thresholds for cumulative health risk impacts are available, it is the policy of the SCAQMD to use the same significance thresholds for cumulative impacts as for the project-specific impacts analyzed in the EIR. If cumulative health risks are evaluated following this SCAQMD policy, the project's contribution to the cumulative cancer risk would be cumulatively considerable under the unmitigated construction scenario since the incremental cancer risk ~~impacts~~ of the proposed Project for more than one receptor ~~under this scenario would be~~*is* above the individual cancer risk significance threshold~~s~~ of 10 in one million. However, the incremental cancer risk impacts of the proposed Project under mitigated construction, 2024 operations, and 2035 operations would be below the individual cancer risk significance threshold of 10 in one million and ~~would not be~~*are not* cumulatively considerable *under SCAQMD policy*.

In contrast to cancer risk, the SCAQMD policy does have different significance thresholds for project-specific and cumulative impacts for hazard indices for TAC emissions. A project-specific significance threshold is one (1.0) while the cumulative threshold is 3.0. Based on this SCAQMD policy, chronic non-cancer hazard indices associated with airport emissions under the proposed Project ~~would not be~~*are not* cumulatively considerable.

50. The first sentence of the second paragraph under Section 5.1 Uncertainties Associated with Emission Estimates and Dispersion Modeling on page 5-1 of Appendix F.2 of the Draft EIR is hereby revised as follows:

In accordance with the Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments,[55] a simplification was made in the emissions modeling to model DPM and not the speciated emissions from diesel-fueled engines ~~for the emission concentrations used in the evaluation of cancer risk or chronic non-cancer health impacts~~.

[55] California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015.

51. The first paragraph under Section 5.2 Evaluation of Sensitive Receptor Populations on page 5-1 of Appendix F.2 of the Draft EIR is hereby revised as follows:

Certain subpopulations may be more sensitive or susceptible to negative health impacts caused by environmental contaminants than the population at large. Risk estimates presented in the HHRA represent a wide range of ~~potential~~ exposures including the highest that can be reasonably expected. Thus, even though risk estimates are not provided for all ~~potentially~~ sensitive receptors *that may exist* in the *study* area, populations not specifically evaluated are still expected to be represented. For example, quantitatively evaluated populations include those with the highest expected exposure durations and exposure frequencies (e.g., residents *living close to the airport*). Exposures are therefore expected to be less for other populations, even those with higher chemical sensitivities*, whose exposures are likely to be substantially less*.

52. The second paragraph under Section 5.3.1 Uncertainties in Exposure Duration for Cancer Risks on page 5-2 of Appendix F.2 of the Draft EIR is hereby revised as follows:

Although in this report, ~~the~~*a* 30-year residential ~~scenario~~*exposure duration* was used for ~~the~~ significance determination, ~~the~~*a* 70-year residential ~~scenario~~*exposure duration* was also calculated to determine cancer burden for evaluation of population-wide risks. ~~These 70-year results~~*Cancer burden estimates* are presented in Section 4.2 of this report. *Cancer burden, even with use of lifetime exposure, does not imply a significant impact under CEQA.*

53. The heading for Section 5.4.2 on page 5-3 of Appendix F.2 of the Draft EIR is hereby revised as follows:

5.4.2 Uncertainties Associated with ~~Unavailable~~*Chemicals Lacking* Toxicity Values

54. The last sentence of the second paragraph on page 5-5 of Appendix F.2 of the Draft EIR is hereby revised as follows:

> As seen in the table, cancer risks calculated using RAGS F methodology are up to ~~40~~ *34* times less than those calculated for the significance determination.

55. Table 5-1: Incremental Cancer Risks for Maximally Exposed Individuals1 from Project Construction and Operation Using RAGS Part F Methodology on Page 5-5 of Appendix F.2 of the Draft EIR is hereby revised. Please see the following revised table.

**Table 5-1: Incremental Cancer Risks for Maximally Exposed Individuals[1/] from Project Construction and Operation Using RAGS Part F Methodology**

| | INCREMENTAL CANCER RISKS[2/] (PER MILLION PEOPLE) | | | |
|---|---|---|---|---|
| | CONSTRUCTION | | OPERATION | |
| RECEPTOR TYPE | UNMITIGATED | MITIGATED | 2024 WITH PROJECT VS. 2024 WITHOUT PROJECT | 2035 WITH PROJECT VS. 2035 WITHOUT PROJECT |
| Adult Resident, 70 years | 4 | 3 | 3 | 3 |
| Adult Resident, 30 years | 2 | 1 | 1 | 1 |
| Child Resident, 9 years | 1 | 0.3 | 0.3 | 0.4 |
| School Child, 12 years | 0.3 | 0.07 | 0.09 | 0.1 |
| Adult Worker, 25 years | 1 | 0.4 | 0.3 | 0.5 |
| Adult Worker, 40 years | 1 | 0.7 | 0.6 | 0.8 |

NOTES:

1/ Cancer risks in this table were calculated at the same grid locations as the results presented in Table 4-3. Values in this table are for the 2024 operations scenario with unmitigated construction.

2/ Cancer risk values provided are changes in the number of cancer cases per million people. Values greater than the threshold are in bold.

SOURCE: CDM Smith, 2017.
PREPARED BY: CDM Smith, 2017.

56. The second paragraph under Section 5.5.3 Uncertainties Associated with Additional Scenarios on page 5-5 of Appendix F.2 of the Draft EIR is hereby revised as follows:

> Results are shown in Table 5-2. These scenarios were not used for a significance determination, but are provided for risk management. *Because these scenarios are not used for significance determination, they were not updated for the Final EIR. The results in Table 5-2 are the same as presented in the Draft EIR.*

57. The bullets under Section 6 Summary on page 6-1 of Appendix F.2 of the Draft EIR are hereby revised as follows:

- Incremental cancer risks associated with construction of the proposed Project are anticipated to be above the threshold of significance of 10 in one million for child ~~resident, school child,~~ and adult resident*s*, and below the threshold of significance for *school child and* adult worker under the unmitigated scenario. Under the mitigated scenario, incremental cancer risks associated with construction of the proposed Project are anticipated to be below the threshold of significance for all receptors.
- Incremental cancer risks associated with operation of the proposed Project for 2024 With Project vs. 2024 Without Project ~~would be~~*are* below the threshold of significance of 10 in one million for all receptor types (i.e., child resident, school child, adult resident, and adult worker) within the study area. Incremental cancer risks associated with operation of the proposed Project for 2035 With Project vs. 2035 Without Project ~~would be~~*are* below the threshold of significance of 10 in one million for all receptor types within the study area.
- Project-related population risks for 70-year residents for construction impacts associated with the proposed Project within the zone of impact of 1 in a million ($10^{-6}$) ~~would be~~*are* below the threshold of significance of 0.5. Project-related population risks for 70-year residents for operations associated with the proposed Project within the zone of impact of $10^{-6}$ ~~would be~~*are* below the threshold of significance of 0.5.
- Since cancer burden is less than the level of significance, impact of operations above is not anticipated to result in a spatially important impact. Thus, overall conclusion for cancer risk evaluation is that impacts to off-site receptors for cancer risks are not significant. Incremental chronic non-cancer hazard indices associated with unmitigated and mitigated construction and operation of the proposed Project are anticipated to be below the threshold of significance for all receptor types (i.e., child resident, school child, adult resident, and adult worker). Incremental chronic non-cancer hazard indices indicate that impacts from construction and operations ~~would be~~*are* less than significant.
- Incremental acute non-cancer hazard indices would be ~~equal to or~~ below the threshold of significance of 1 at all locations of modeled peak TAC concentrations for unmitigated and mitigated construction and operation of the proposed Project. Incremental acute non-cancer hazard indices indicate that impacts would not be significant.
- Estimated maximum air concentrations for all TAC evaluated on the proposed Project site would not exceed PEL-TWA for Project construction workers. Therefore, health impacts to on-airport/on-site workers ~~would be~~*are* less than significant.
- From a cumulative standpoint, chronic non-cancer health hazards and acute non-cancer health hazards from the proposed Project construction would likely contribute negligibly to the risks and hazards from emissions for anticipated concurrent construction projects at LAX. Since it is the policy of the SCAQMD to use the same significance thresholds for cumulative impacts as for the project-specific impacts analyzed in the EIR, the project's contribution to the cumulative cancer

risk ~~would be~~*are* cumulatively considerable since the incremental cancer risk impacts of the proposed Project for more than one receptor under unmitigated construction ~~would be~~*are* above the individual cancer risk significance threshold of 10 in one million. However, cancer burden analysis indicates that overall impacts of cancer risk are less than significant. In addition, the incremental cancer risk impacts of the proposed Project for all receptors under mitigated construction, 2024 operations, and 2035 operations ~~would be~~*are* below the individual cancer risk significance threshold of 10 in one million.

- Estimated cumulative risks and hazards from emissions for concurrent construction projects at LAX would not be measurable against urban background conditions in the South Coast Air Basin.

58. Several revisions have been made to the calculations relating to the Project-related construction and operational emissions and subsequent analyses. Calculation files for Attachments one through three of Appendix F.2 are hereby replaced. Please see the replacement pages in Attachment 2.

59. All figures referenced in Appendix F.2 Human Health Risk Assessment are hereby replaced with corrected figures, including: 4-1, 4-2A, 4-2B, 4-2C, 4-2D, 4-3A, 4-3B, 4-3C, 4-3D, 4-4A, 4-4B, 4-5A, 4-5B, 4-6A, 4-6B, 4-7A, 4-7B, 4-8A, 4-8B, 4-9A, 4-9B, 4-10A, 4-10B. Please see the following revised figures.

## Appendix M Noise and Vibration

60. The first sentence of the fourth paragraph under the heading M.1.4 Data Collection on page M-10 of Appendix M of the Draft EIR is hereby revised as follows:

Two 1-hour measurements were collected at the Concourse Hotel,[7] located on the corner of Sepulveda Boulevard and W. Century Boulevard, due to equipment malfunction during the overnight collection period.

[7] *At the time of preparation of the Draft EIR, the hotel at 6225 W. Century Boulevard was named the Concourse Hotel. In October 2016, the Concourse Hotel was renamed as the Hyatt Regency Los Angeles International Airport.*

61. The second paragraph on page M-40 of Appendix M of the Draft EIR is hereby revised as follows:

The terrain for the Project site is relatively flat and the top-of-rail elevation ranges from *approximately* 70 feet above grade within the CTA*, to approximately 50 feet above grade near the ITF East and CONRAC* ~~to 40 feet above grade near the Intermodal Transportation Facility (ITF) West and APM Maintenance and Storage Facility (MSF)~~.

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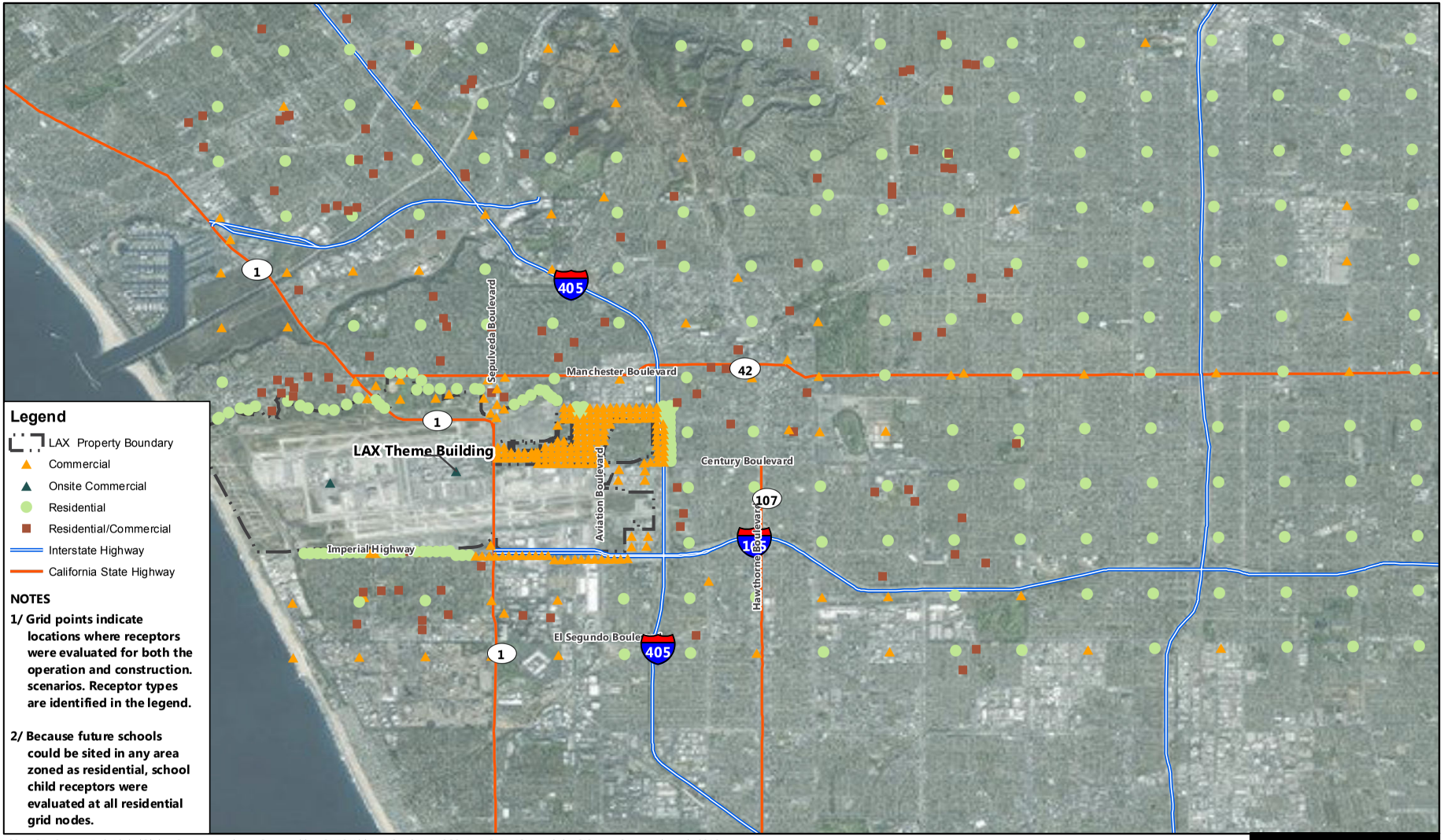


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-1**

## Grid Point Locations

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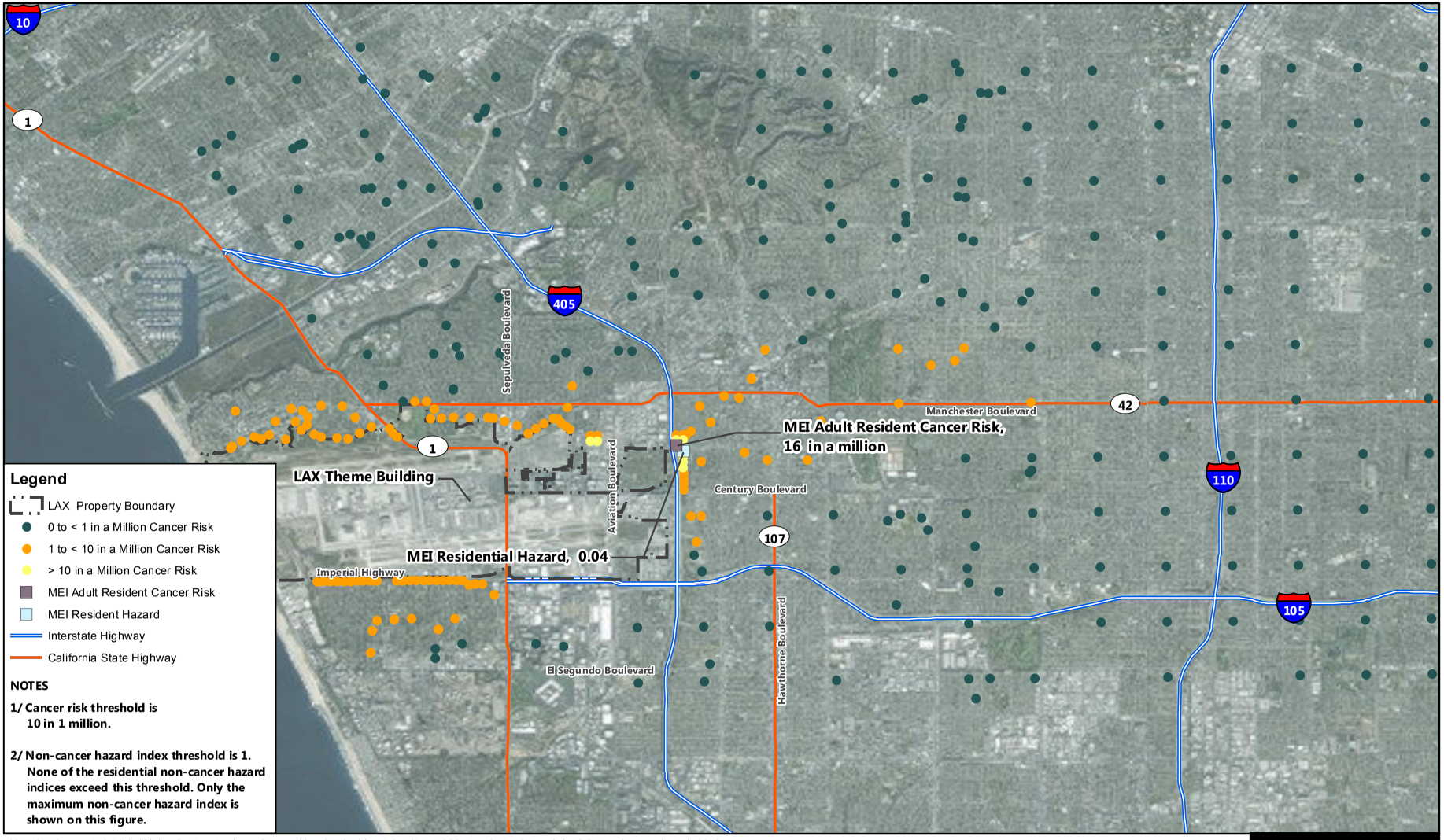


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4-2A**

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## Construction Unmitigated – 30-year Adult Residential Incremental Cancer Risk

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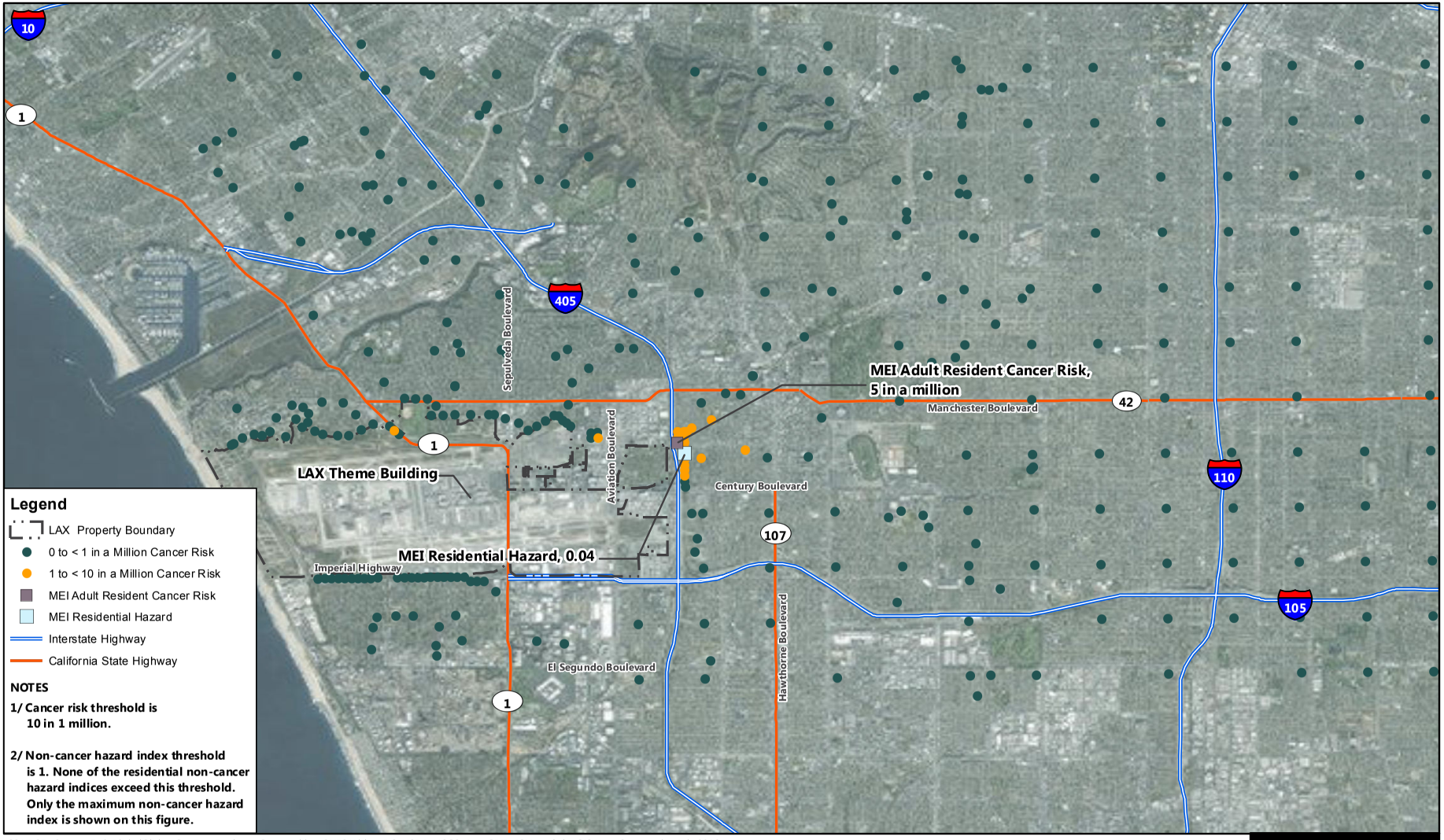


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4-2B**

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## Post-Mitigation Construction - 30-year Adult Residential Incremental Cancer Risk

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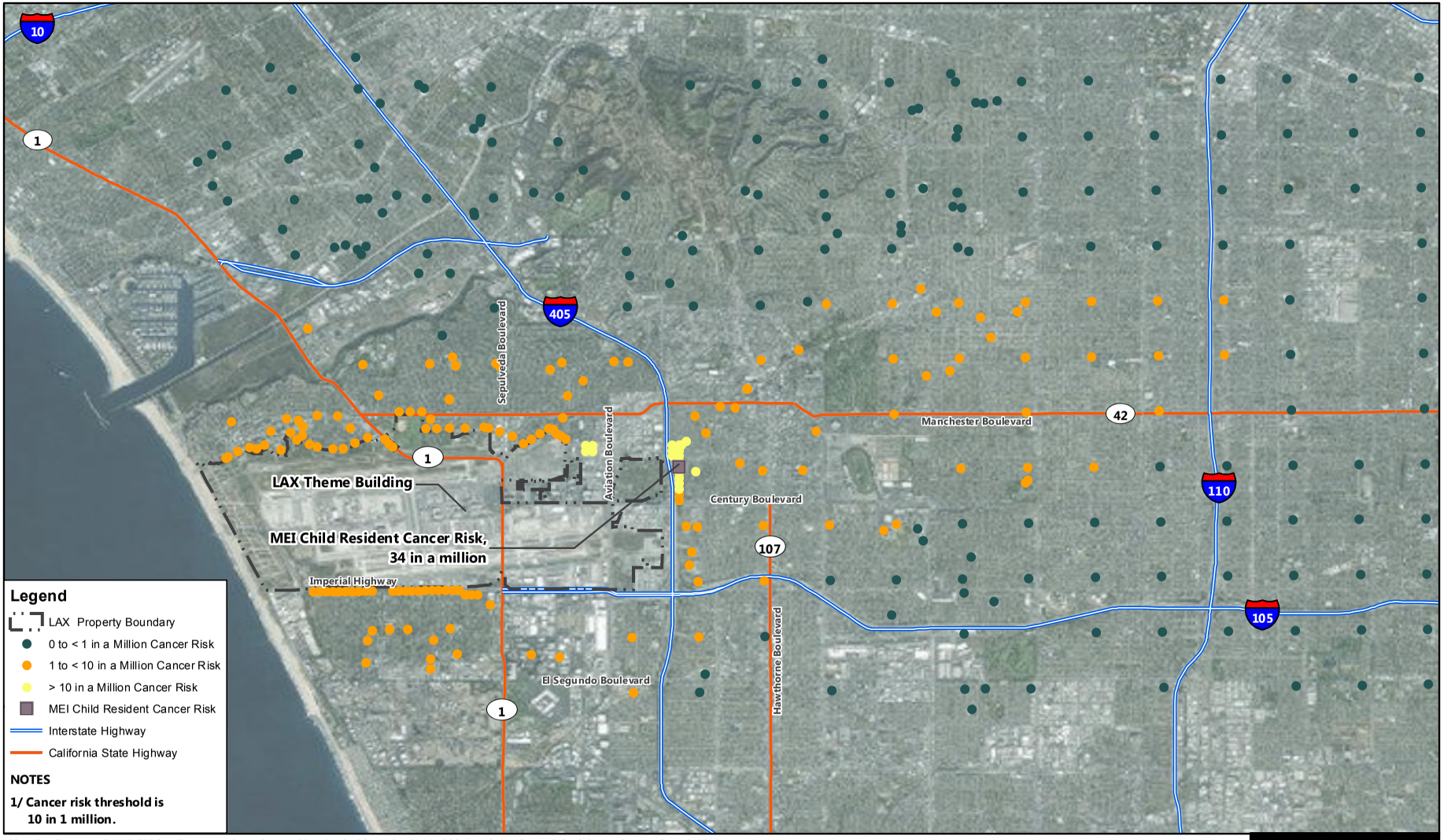


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4-2C**

## Construction Unmitigated – 9-year Child Residential Incremental Cancer Risk

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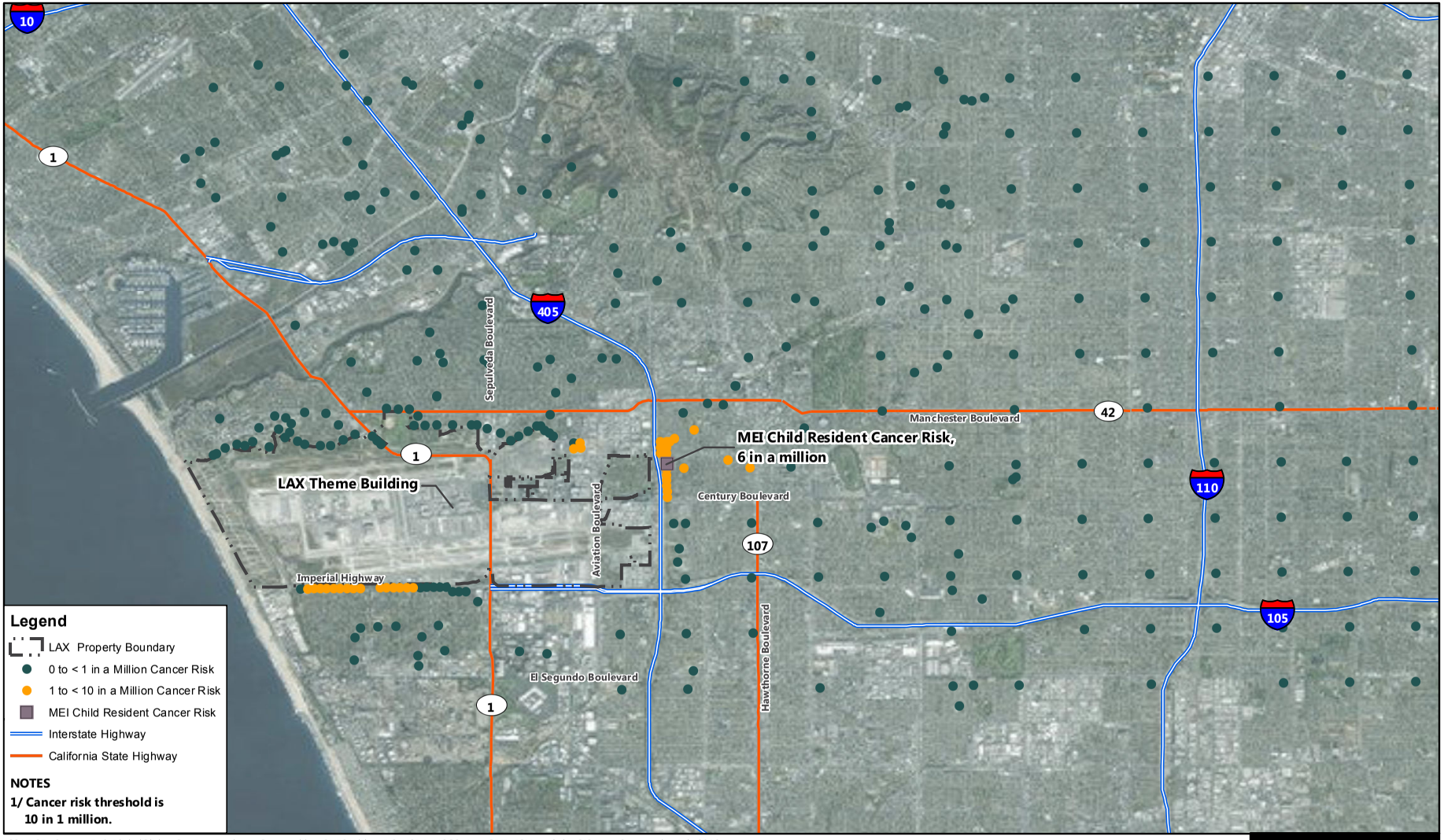


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4-2D**

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## Post-Mitigation Construction - 9-year Child Residential Incremental Cancer Risk

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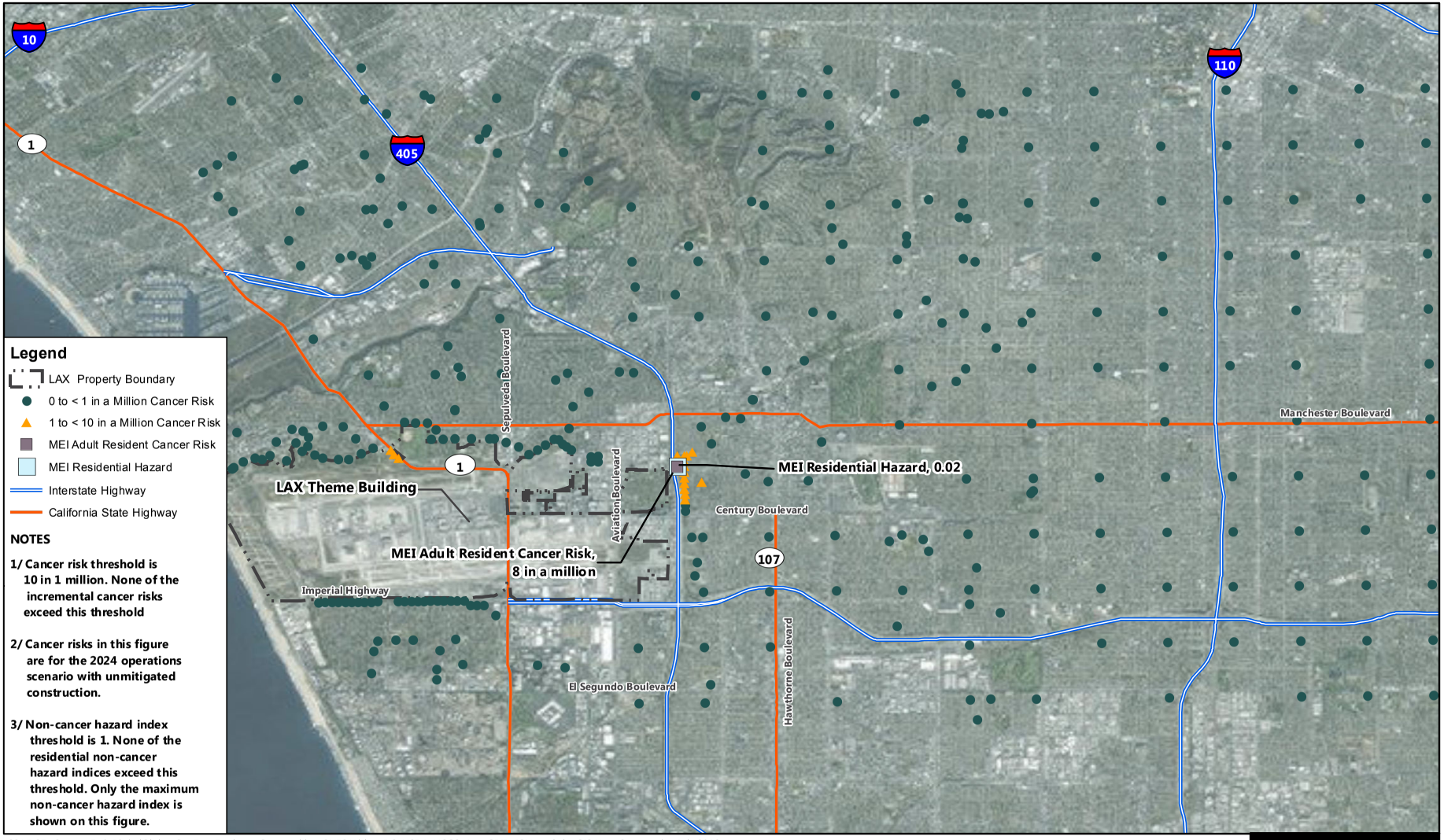


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4-3A**

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2024 With Project Scenario vs. 2024 Without Project Scenario -
30-year Adult Residential Incremental Cancer Risk

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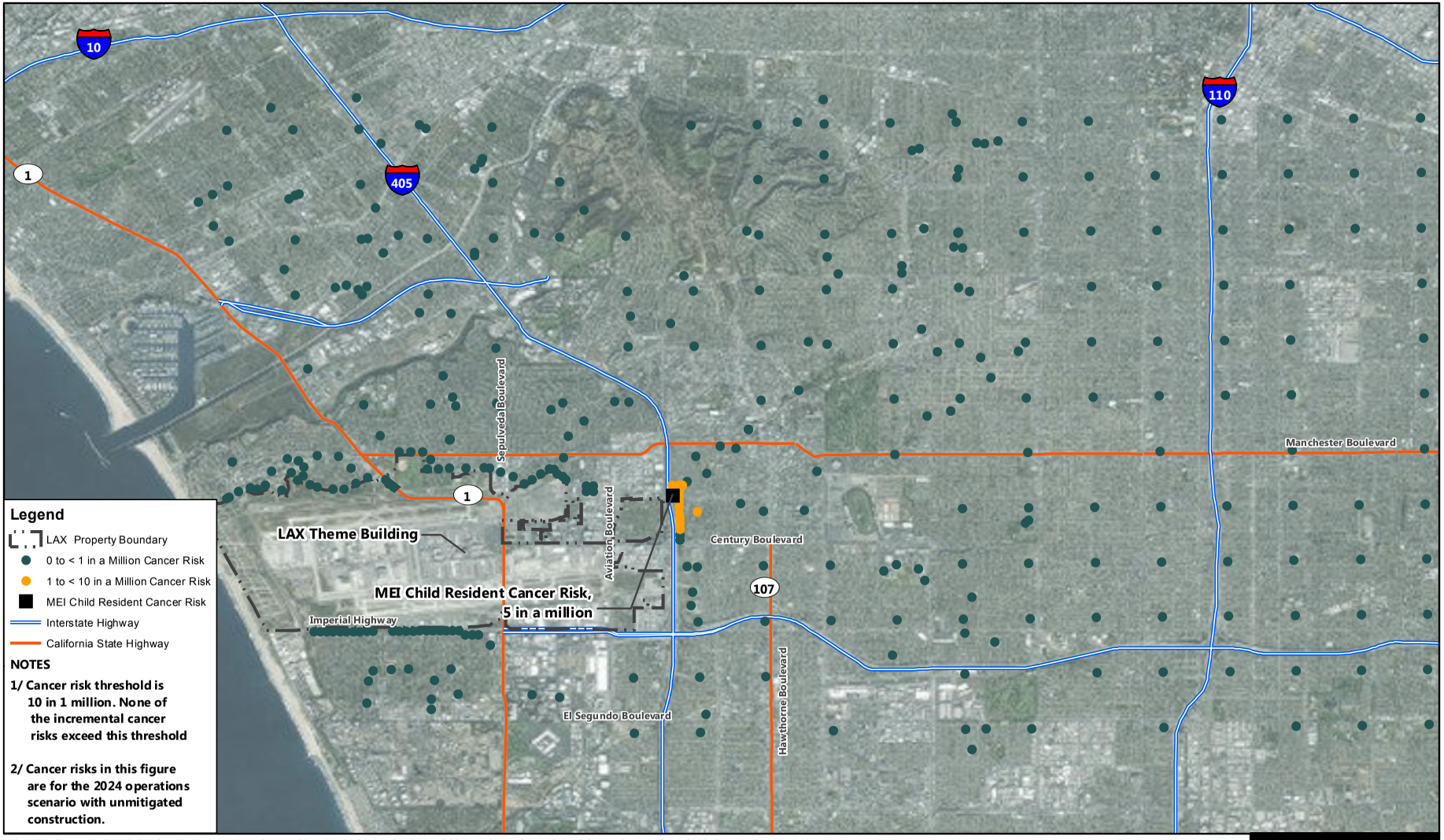


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
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**FIGURE 4-3B**

2024 With Project Scenario vs. 2024 Without Project Scenario -
9-year Child Residential Incremental Cancer Risk

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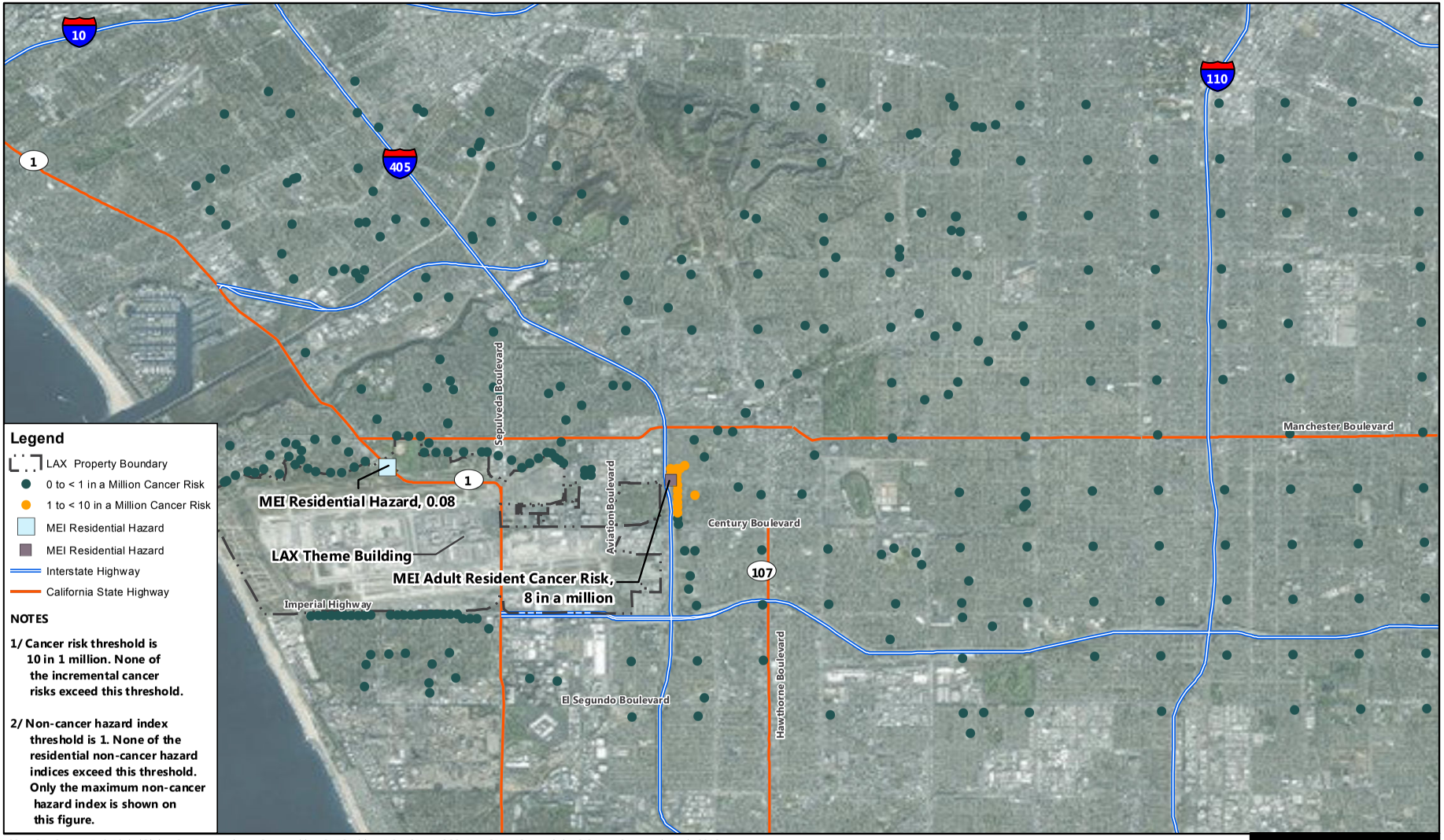


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-3C**

2035 With Project Scenario vs. 2035 Without Project Scenario - 30-year Adult Residential Incremental Cancer Risk

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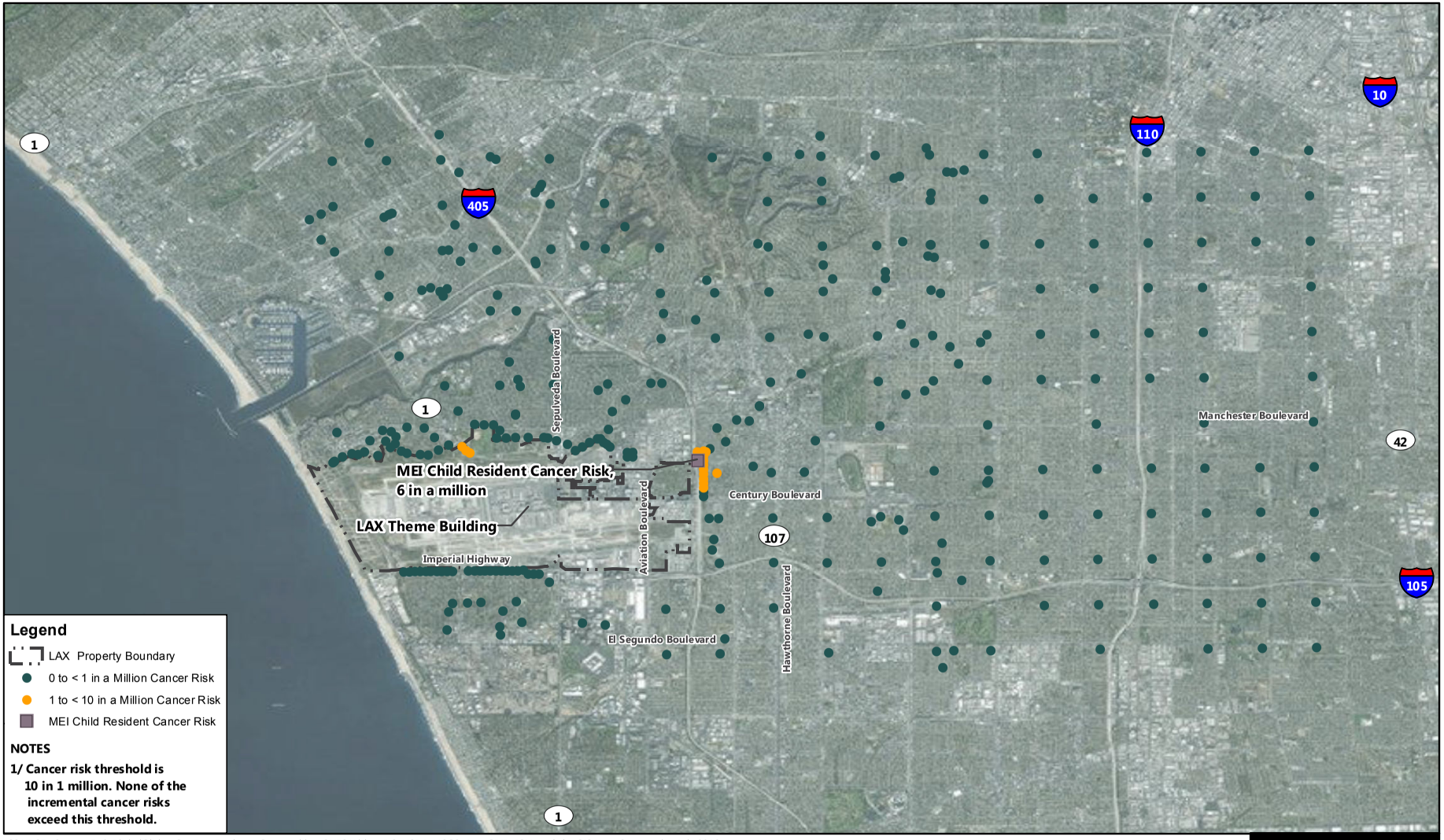


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-3D**

2035 With Project Scenario vs. 2035 Without Project Scenario -
9-year Child Residential Incremental Cancer Risk

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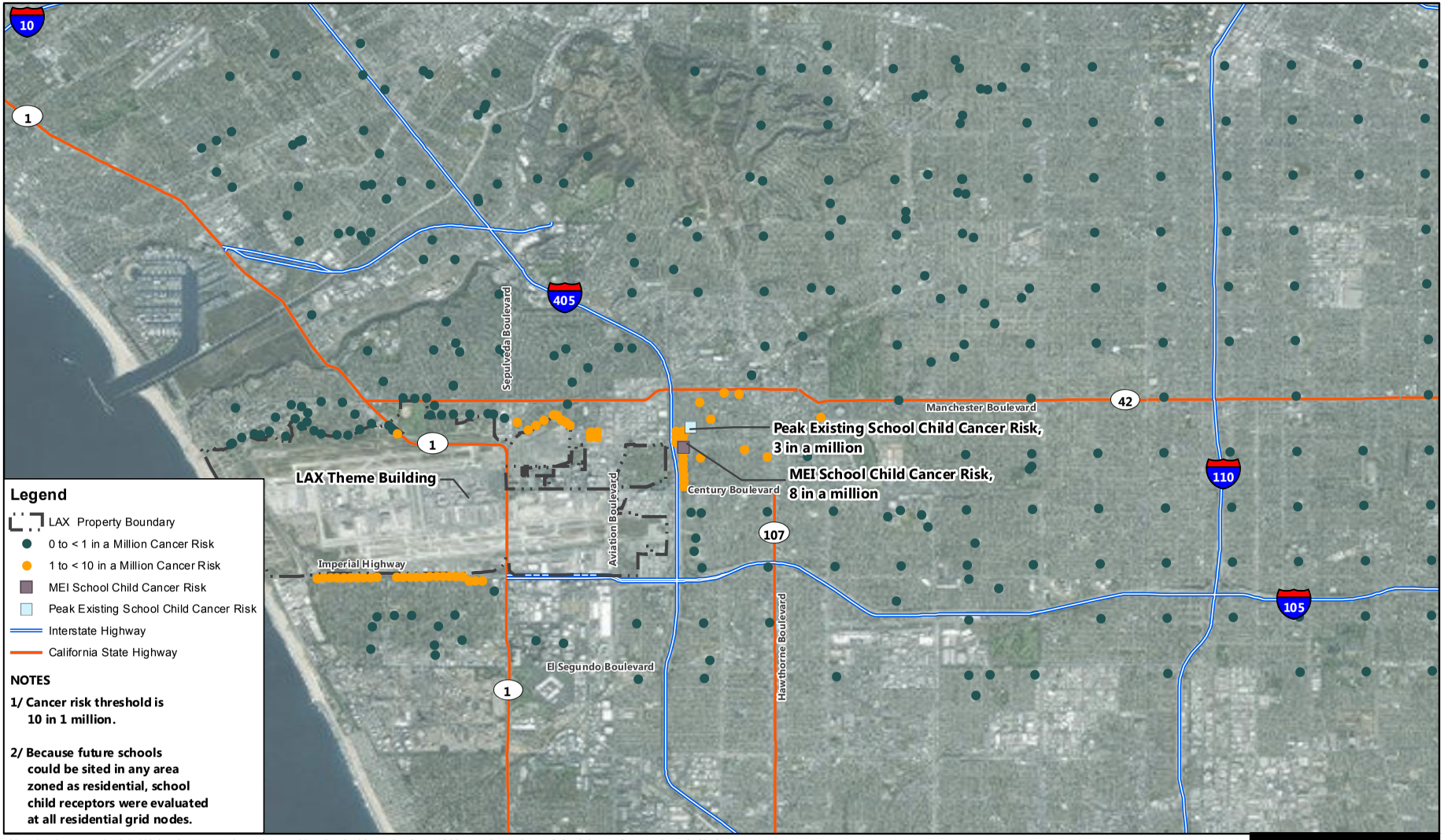


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-4A**

## Construction Unmitigated – 12-year School Child Incremental Cancer Risk

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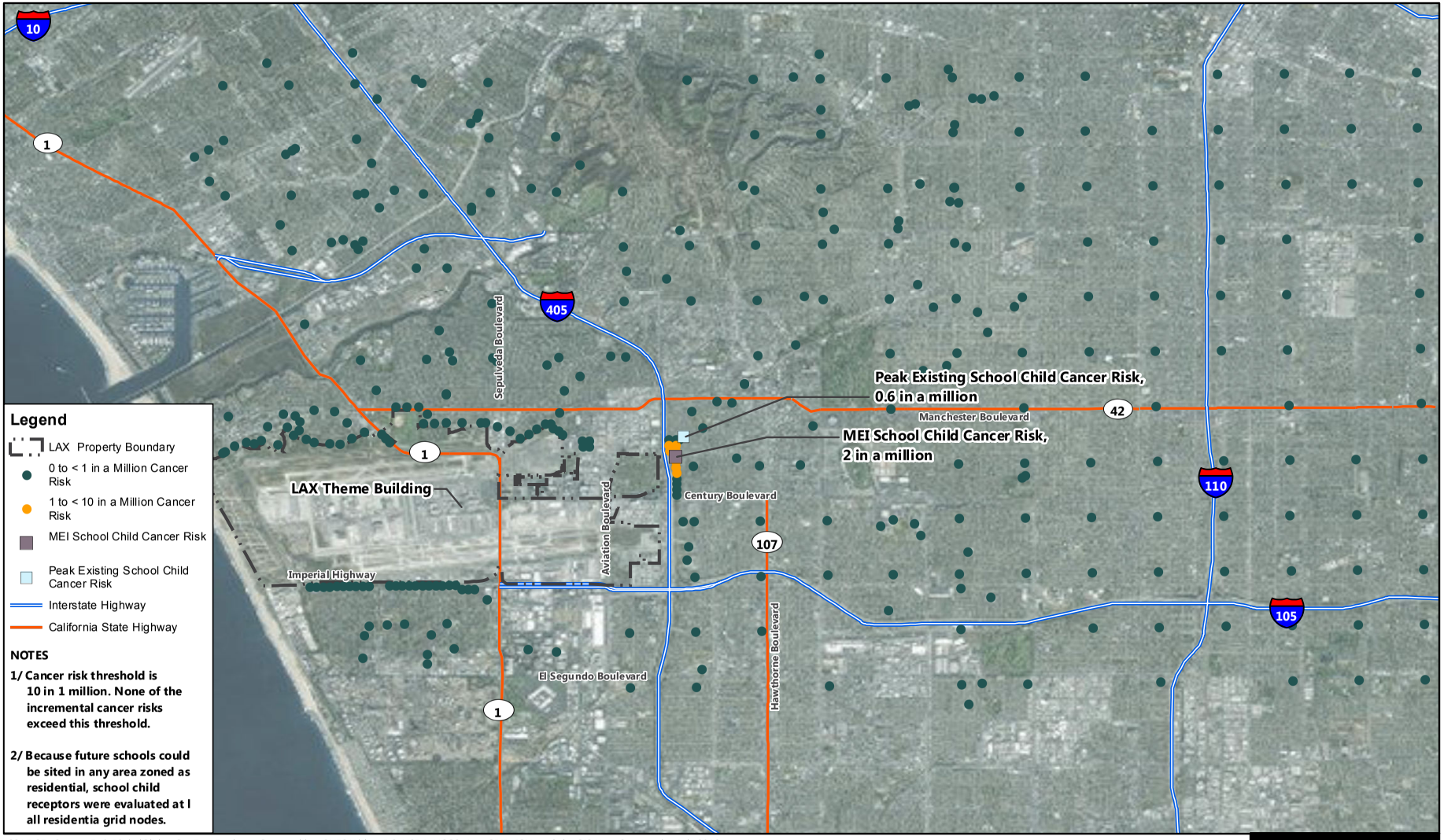


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-4B**

## Post-Mitigation Construction - 12-year School Child Incremental Cancer Risk

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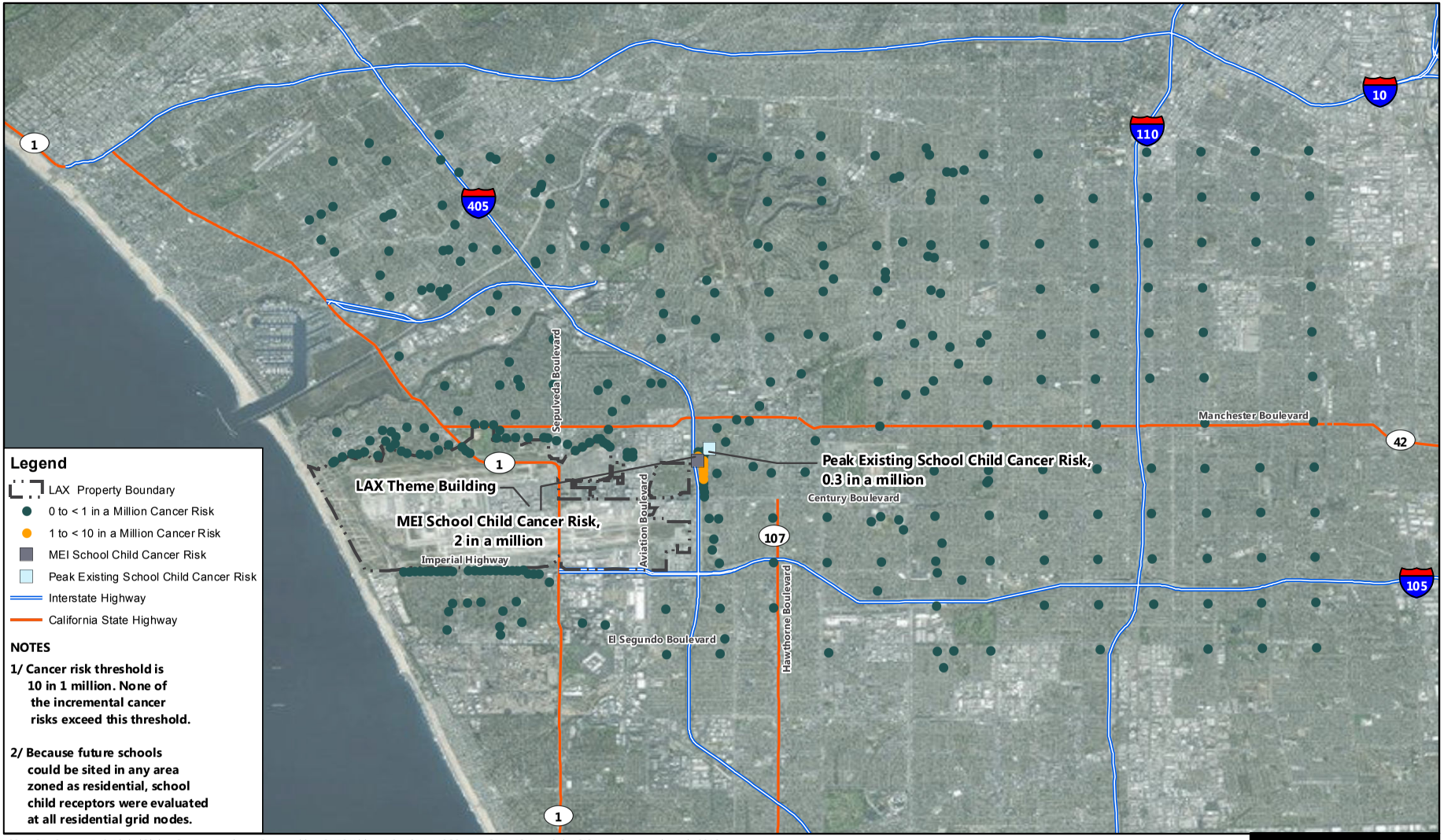


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-5A**

2024 With Project Scenario vs. 2024 Without Project Scenario -
12-year School Child Incremental Cancer Risk

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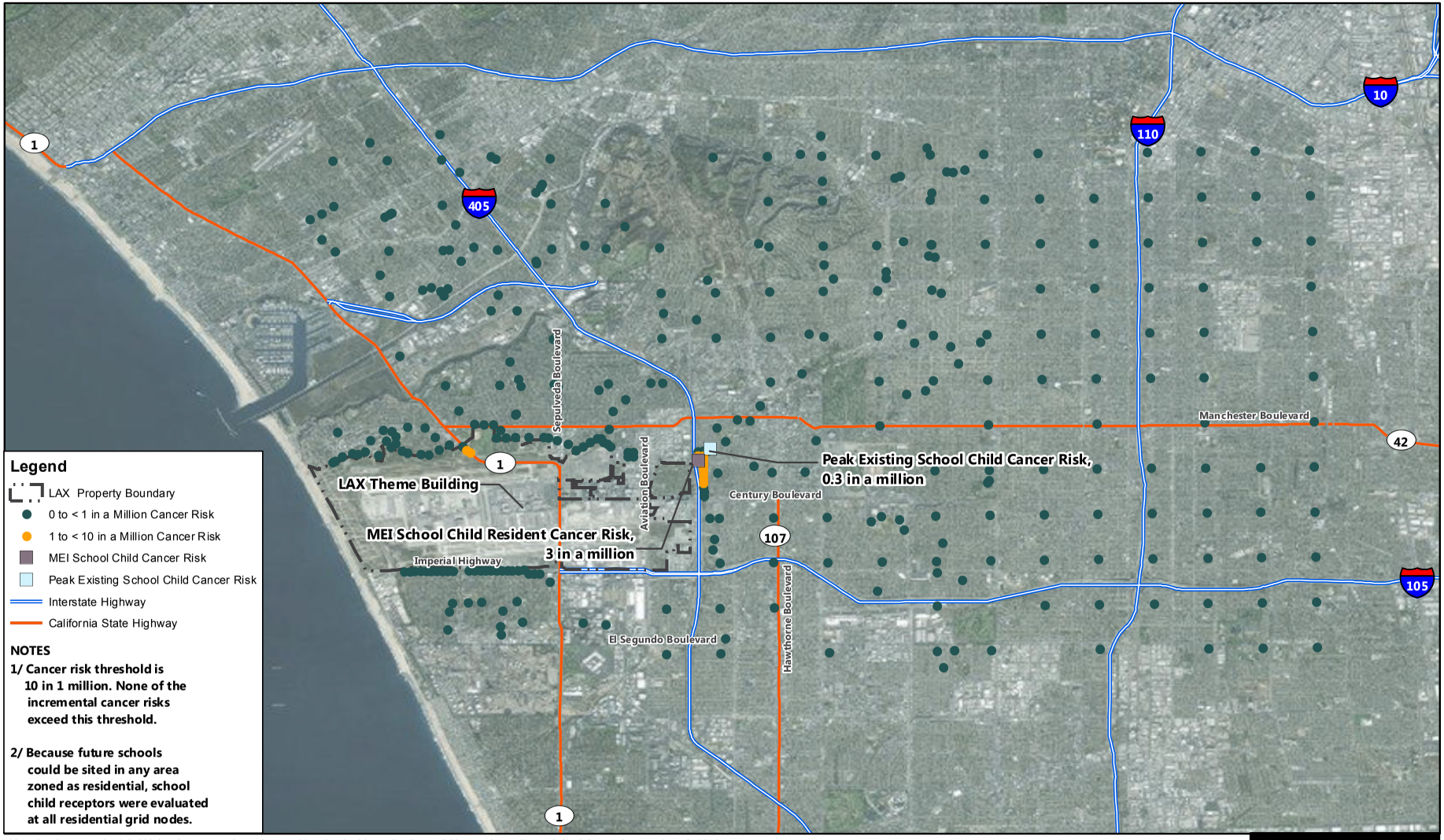


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-5B**

2035 With Project Scenario vs. 2035 Without Project Scenario -
12-year School Child Incremental Cancer Risk

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Miles

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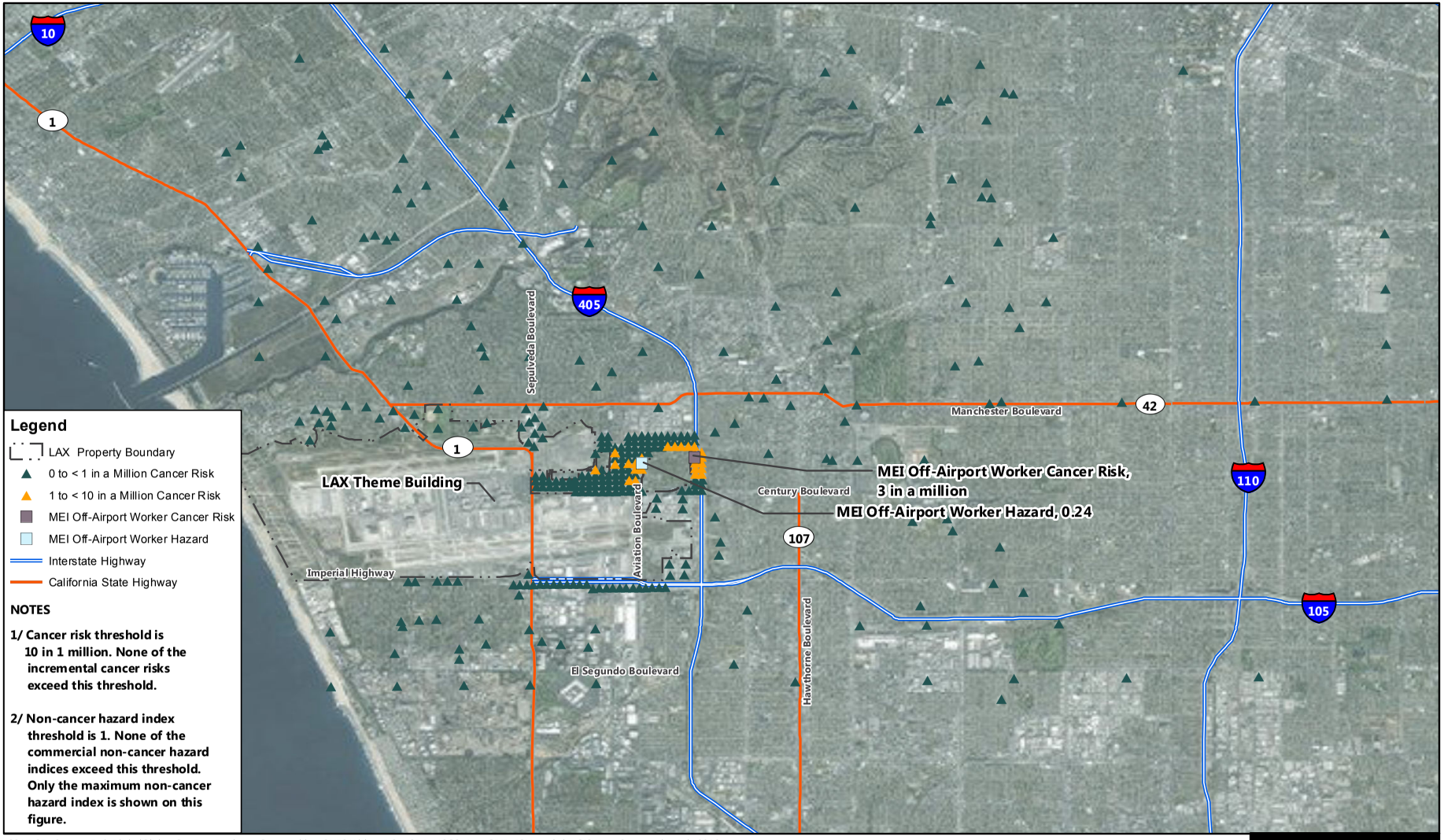


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-6A**

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Feet

## Construction Unmitigated – 25-year Off-Airport Worker Incremental Cancer Risk

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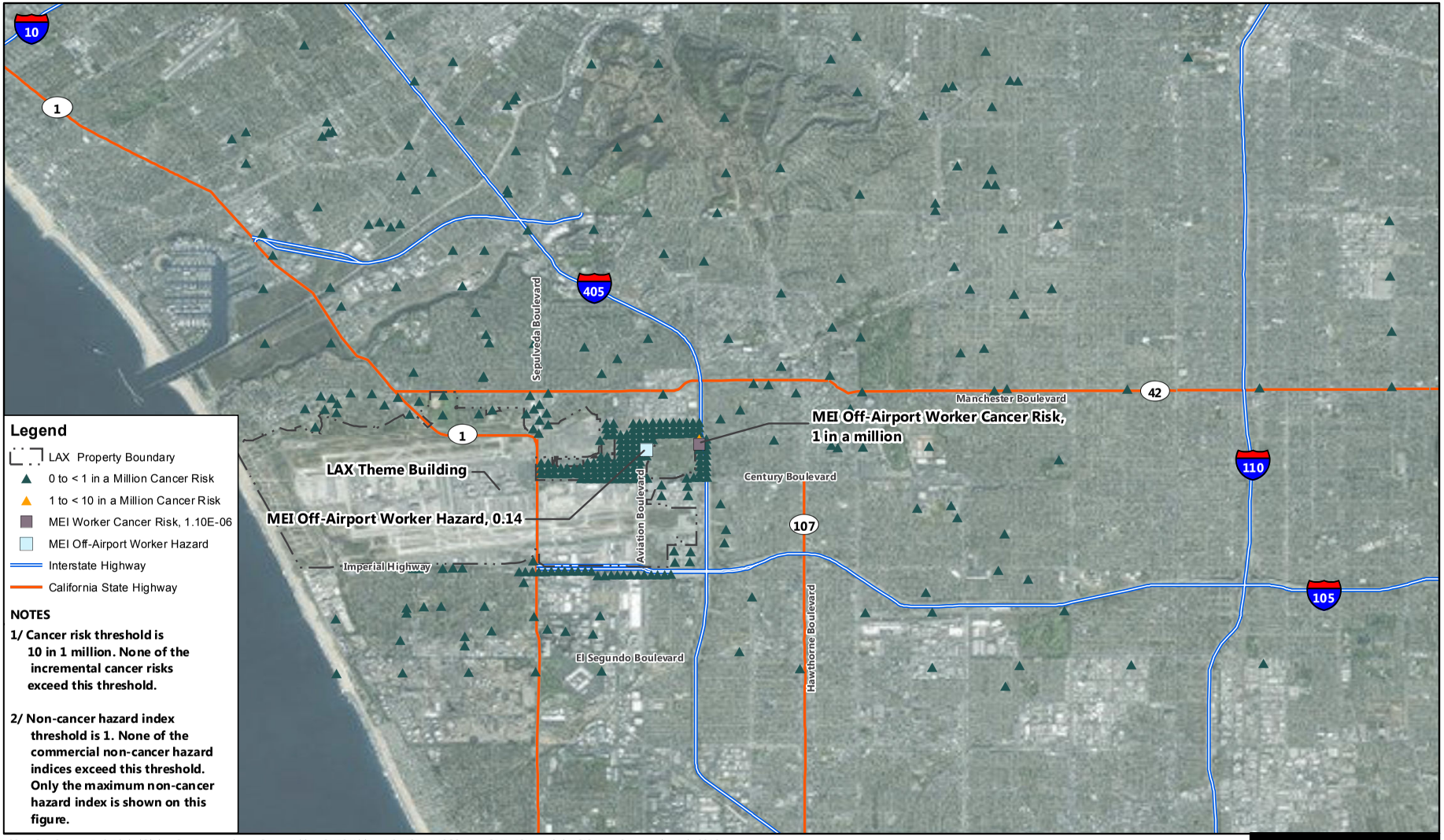


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-6B**

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Feet

## Post-Mitigation Construction - 25-year Off-Airport Worker Incremental Cancer Risk

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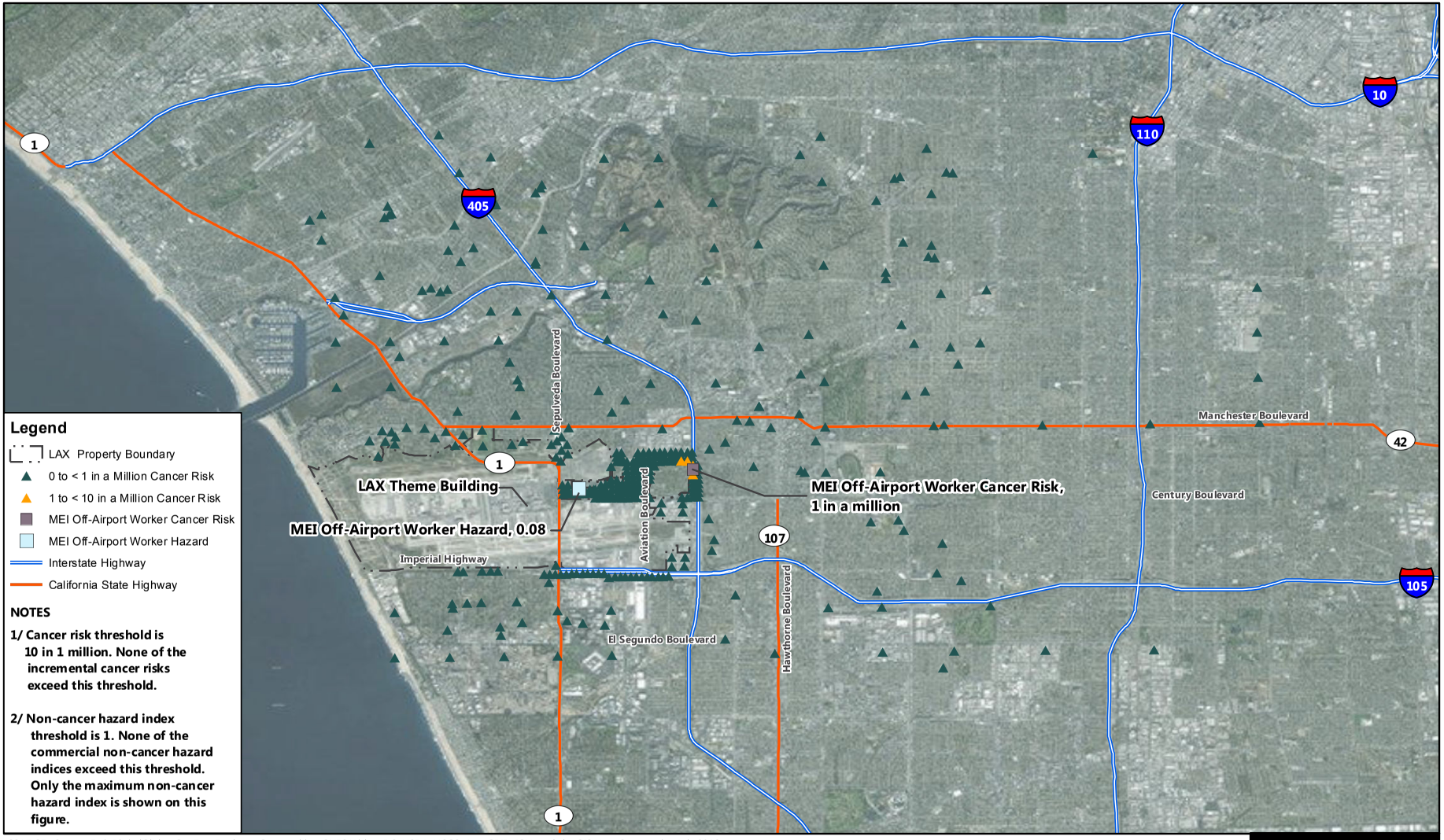


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-7A**

2024 With Project Scenario vs. 2024 Without Project Scenario - 25-year Off-Airport Worker Incremental Cancer Risk

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Miles

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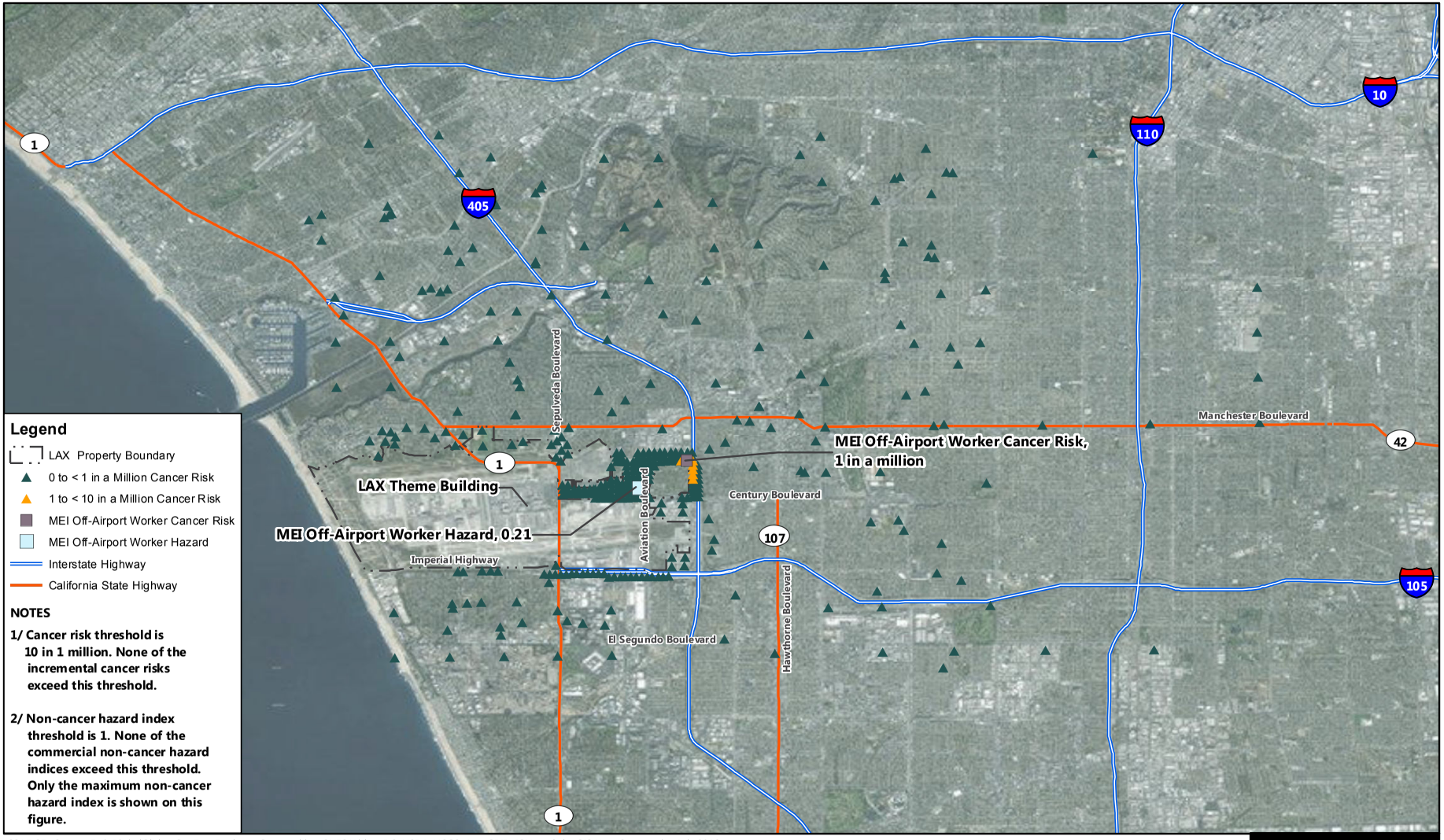


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-7B**

2035 Future With Project Scenario vs. 2035 Future Without Project Scenario - 25-year Off-Airport Worker Incremental Cancer Risk

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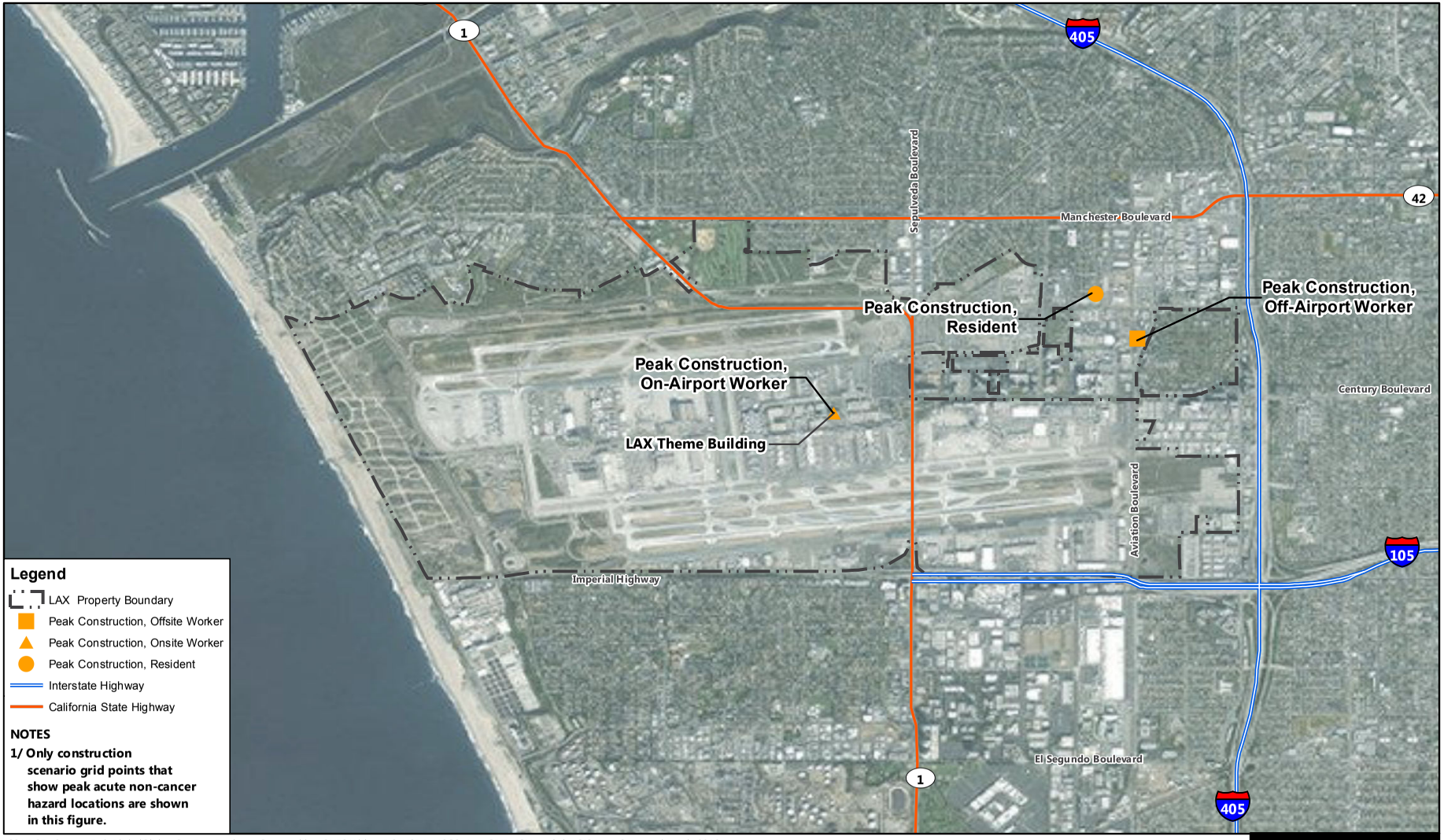


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-8A**

0 2
Miles

## Construction Peak Acute Non-Cancer Hazard Locations

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SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-8B**

0 2
Miles

## Operations Peak Acute Non-Cancer Hazard Locations

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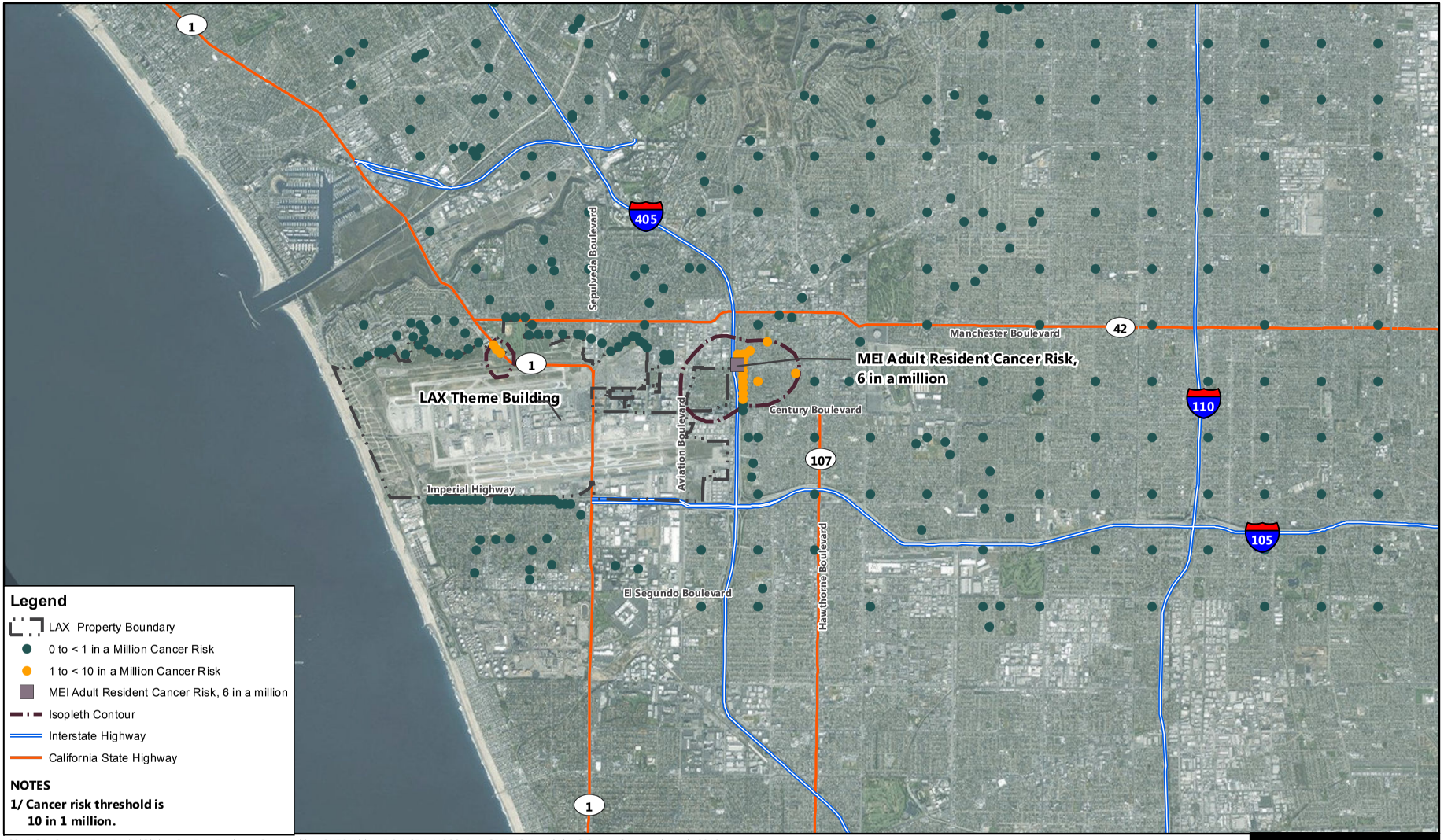


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-9B**

## Construction Mitigated – 70-year Adult Residential Incremental Cancer Risk

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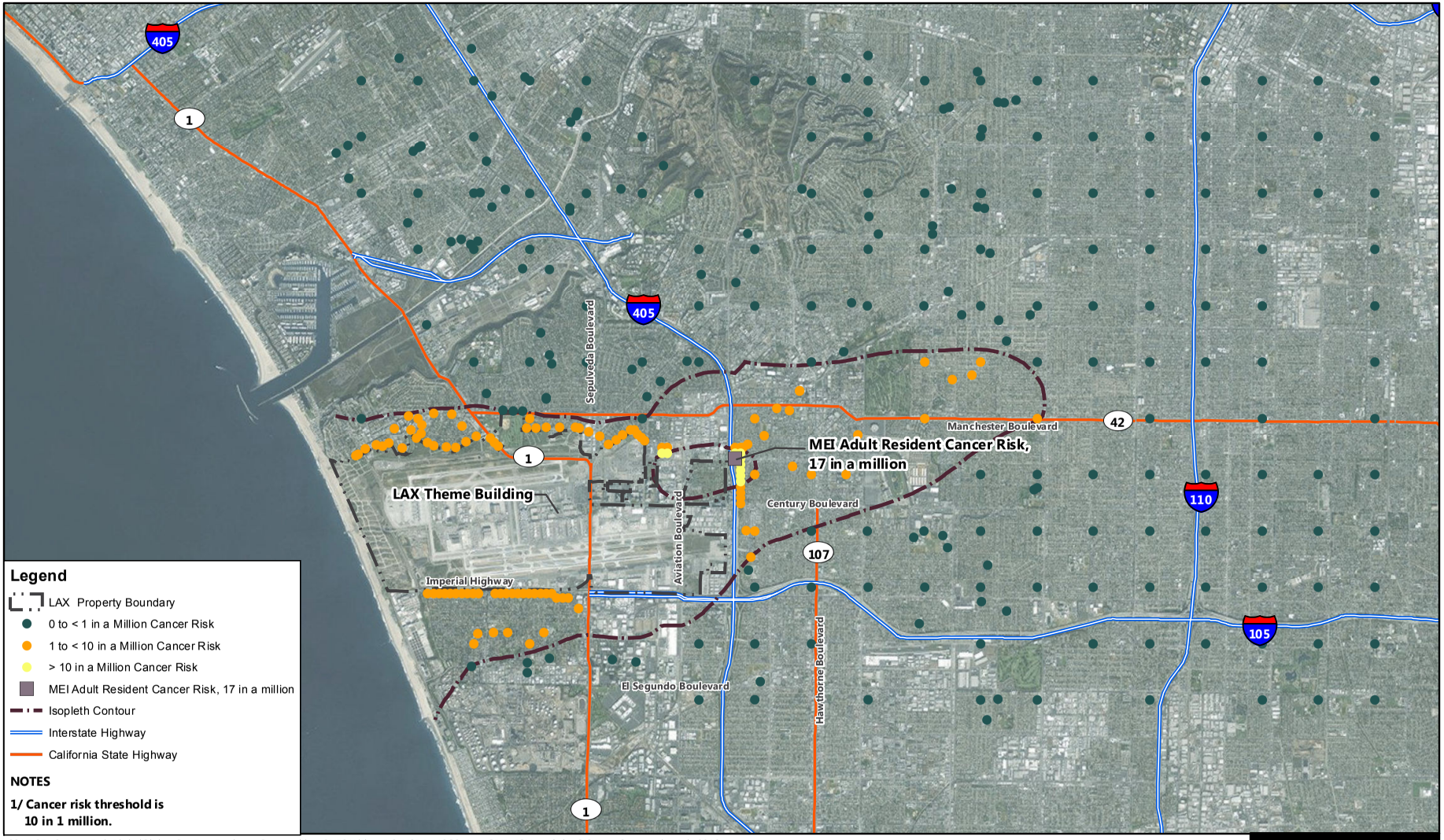


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-9A**

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Miles

## Construction Unmitigated - 70-year Adult Residential Incremental Cancer Risk

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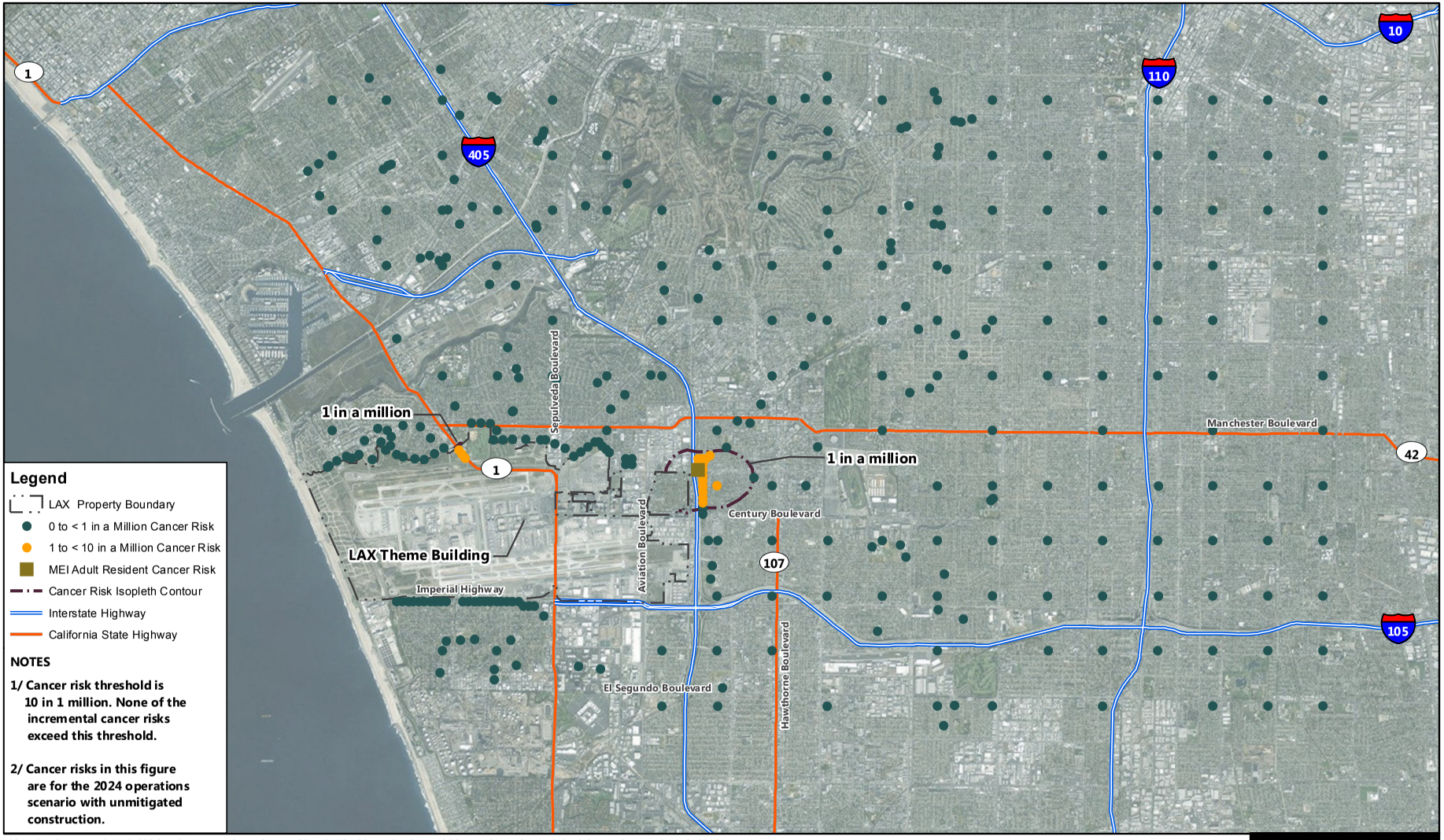


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-10A**

0 4
Miles

## 2024 With Project v. 2024 Without Project Operations - 70-year Adult Residential Incremental Cancer Risk Isopleth

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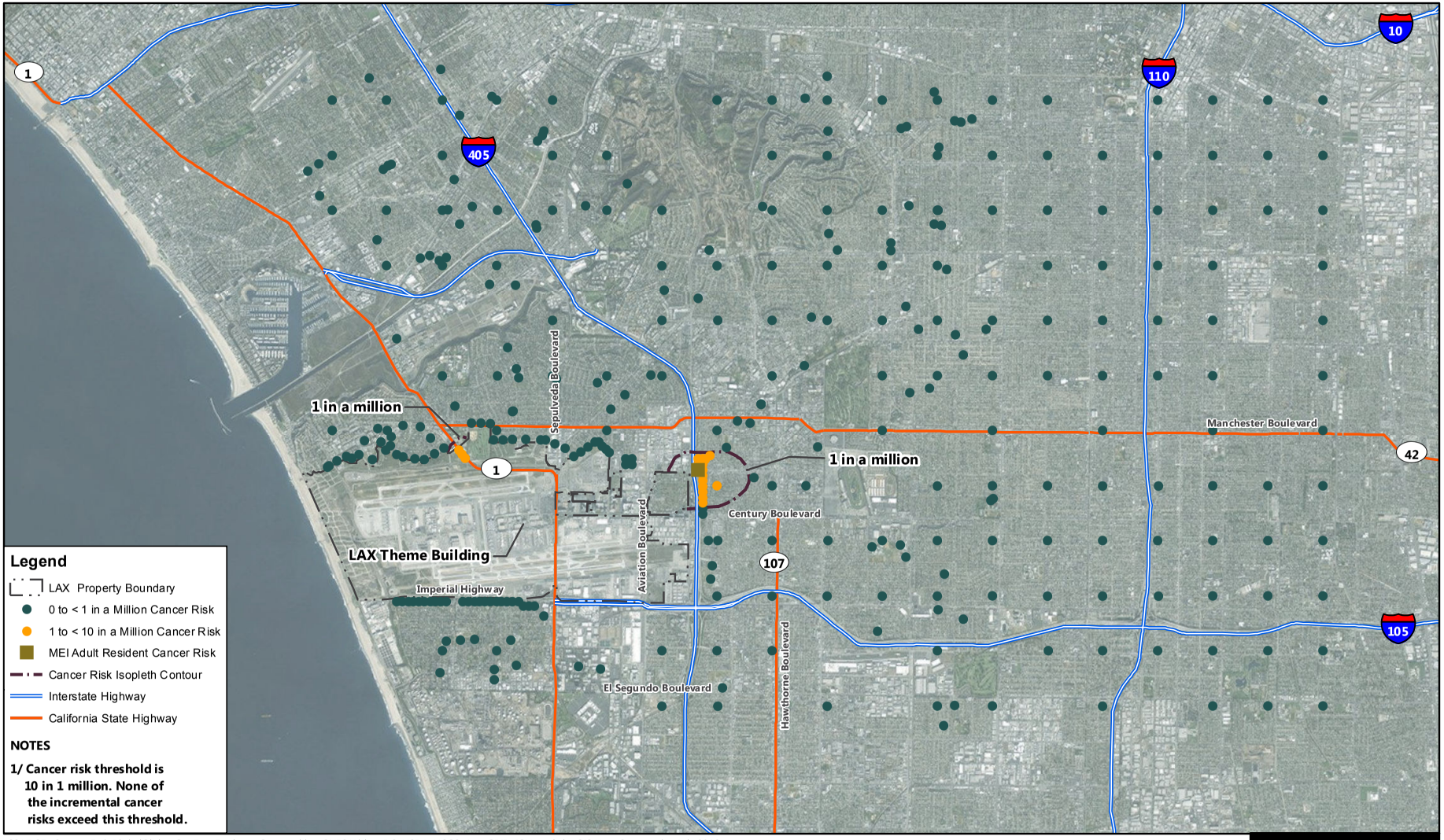


SOURCE: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, July 2016
PREPARED BY: CDM Smith Inc., February 2017

**FIGURE 4-10B**

0 4
Miles

2035 With Project v. 2035 Without Project Operations -
70-year Adult Residential Incremental Cancer Risk Isopleth

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## Appendix O Off-Airport Traffic Study

1. The first paragraph under the Existing Traffic Volumes section beginning on page 55 of Appendix O of the Draft EIR is hereby revised as follows:

> Using video footage during morning and evening peak hours, traffic counts were compiled from data collected at ~~13~~3 of the 183 analyzed intersections in 201~~6~~5; while data was collected at *130 intersections in 2015 and* 44 intersections in 2014. The traffic counts at the remaining 6 intersections were obtained from 2013. Consistent with the City of Los Angeles' Traffic Study Policies and Procedures, traffic counts at intersections within the City of Los Angeles jurisdiction were generally obtained from 7-10 AM and from 3-6 PM. The counts at the remaining intersections in other jurisdictions were obtained from 7-9 AM and 4-6 PM.

2. Table 5: Existing Transit Lines Serving the Study Area on Page 60 of Appendix O of the Draft EIR is hereby revised. Please see the following revised table.

3. Figure 8 on page 69 of Appendix O of the Draft EIR is hereby replaced with a corrected figure. Please see the following revised figure.

4. Table 17 on page 193 of Appendix O of the Draft EIR has been corrected to change Private Parking Shuttles to *Off-Airport Private Parking* to be consistent with Table 18 on page 194 of Appendix O of the Draft EIR.

5. The bulleted list under the REGIONAL TRANSIT IMAPCT ANALYSIS section on page 430 of Appendix O of the Draft EIR is hereby revised as follows:

- Evidence that affected transit operators received the *Notice of Preparation (*NOP*);*
- ~~Existing transit service in the study area.~~ *A summary of existing transit services in the Project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2-mile radius of the project, and; rail service within a 2-mile radius of the project;*
- Project trip generation estimates*;*
- Project transit trip estimates*;*
- ~~Project components to encourage transit use~~ *Information of facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM ordinance measures, but other project specific measures;*
- Analysis *of expected project impacts on current and future transit services* and *proposed* mitigation *measures, and;*
- *Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.*

**TABLE 5**
**EXISTING TRANSIT LINES SERVING THE STUDY AREA**

| PROVIDER | LINE NUMBER | ONE-WAY ROUTE LENGTH (MILES) | AVERAGE DAILY RIDERS | SERVICE AREA | DIRECTION | SERVICE TYPE | HOURS OF OPERATION | PEAK HOUR FREQUENCY (AM/MIDDAY/PM) | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | NORTHBOUND/EASTBOUND | SOUTHBOUND/WESTBOUND |
| MTA | 40 | 20.2 | 16,931 | Downtown LA - South Bay Galleria via King - Hawthorne | N/S | LOCAL & NIGHT OWL | 4:33 AM - 12:48 AM | 14MIN / 20MIN / 20MIN | 16MIM / 20MIN / 19MIN |
| MTA | 102 | 16.0 | 2,526 | LAX City Bus Center - South Gate | E/W | LOCAL | 5:13 AM - 12:28 AM | 28MIN / 30MIN / 30MIN | 42MIN / 1HR / 1HR |
| MTA | 111/311 | 21.2 | 16,403 | LAX City Bus Center - Norwalk Station via Florence Av. | E/W | LOCAL & LIMITED | 4:13 AM - 10:04 PM | 18MIN / 30MIN / 16MIN | 17MIN / 30MIN / 17MIN |
| MTA | 117 | 18.4 | 8,493 | LAX City Bus Center - Downey via Century Bl. & Imperial Hwy | E/W | LOCAL | 4:08 AM - 2:10 AM | 20MIN / 21MIN / 22MIN | 22MIN / 24MIN / 21MIN |
| MTA | 120 | 29.8 | 4,051 | Aviation Station - Whittwood Mall via Imperial Hwy. | E/W | LOCAL | 4:38 AM - 12:42 AM | 38MIN / 1HR / 30MIN | 36MIN / 1HR / 1HR |
| MTA | 232 | 25.8 | 5,865 | LAX City Bus Center - Long Beach via Sepulveda Bl. & PCH | N/S | LOCAL | 3:48 AM - 12:46 AM | 14MIN / 30MIN / 19MIN | 15MIN / 22MIN / 17MIN |
| MTA | 625 | 10.5 | 358 | Aviation/LAX Green Line Station - World Way West | E/W | SHUTTLE | 4:57 AM - 9:43 AM | 21MIN / NO SERVICE / 24MIN | 21MIN / NO SERVICE / 23MIN |
| MTA | Green Line (803) | 19.6 | 39,950 | Norwalk - Redondo Beach | E/W | METRO RAIL SERVICE | 3:36 AM - 1:24 AM | 8MIN / 15MIN / 8MIN | 8MIN / 15MIN / 8MIN |
| LADOT | 438 | 28.3 | 660 | Palos Verdes & Via Valencia - Temple & San Pedro | N | COMMUTER EXPRESS | 5:45 AM - 8:54 AM | 14MIN / NO SERVICE / NO SERVICE | NO SERVICE |
| | | | | Temple & Los Angeles - Palos Verdes & Via Valencia | S | COMMUTER EXPRESS | 3:45 PM - 7:27 PM | NO SERVICE | 15MIN / NO SERVICE / NO SERVICE |
| LADOT | 574 | 38 | 297 | Space Park & Aviation - Sylmar Metrolink Station | N/S | COMMUTER EXPRESS | 5:21 AM - 7:39 PM | NO SERVICE / NO SERVICE / 30 MIN | 25 / NO SERVICE / NO SERVICE |
| CULVER CITY BUS | 6 | 12.6 | 3,643 | Metro Green Line Station - UCLA | N/S | LOCAL | 5:22 AM - 12:46 AM | 16MIN / 15MIN / 20MIN | 15MIN / 15MIN / 20MIN |
| CULVER CITY BUS | R6 | 12.6 | 2,071 | Metro Green Line Station - UCLA | N/S | RAPID | 5:50 AM - 6:35 PM | 15MIN / NO SERVICE / 15MIN | 15MIN / NO SERVICE / 15MIN |
| BIG BLUE BUS | 3 | 17.6 | 9,000 | Green Line Aviation Station - Hilgard Terminal | N/S | LOCAL | 5:19 AM - 12:37 AM | 15MIN / 15MIN / 15MIN | 15MIN / 12MIN / 15MIN |
| BIG BLUE BUS | R3 | 11 | 2,533 | Green Line Station - 5th & Arizona | N/S | RAPID | 5:44 AM - 8:36 PM | 15MIN / NO SERVICE / 15MIN | 15MIN / NO SERVICE / 15MIN |
| BEACH CITIES TRANSIT | 109 | 18 | 600 | Redondo Beach - LAX City Bus Center | N/S | LOCAL | 5:55 AM - 9:47 PM | 45MIN / 45MIN / 45MIN | 45MIN / 45MIN / 45MIN |
| TORRANCE TRANSIT | 8 | 14.5 | 2,165 | Madison St. at PCH - LAX Transit Center (Bay 3) | N/S | LOCAL | 5:00 AM - 11:15 PM | 20MIN / 30MIN / 20MIN | 20MIN / 30MIN / 20MIN |

Source:
Los Angeles County Metropolitan Transit Authority (MTA) website.
City of Los Angeles Department of Transportion (LADOT) transit services website.
City of Culver City website.
City of Santa Moinca Big Blue Bus website.
City of Redondo Beach website.
City of Torrance website.

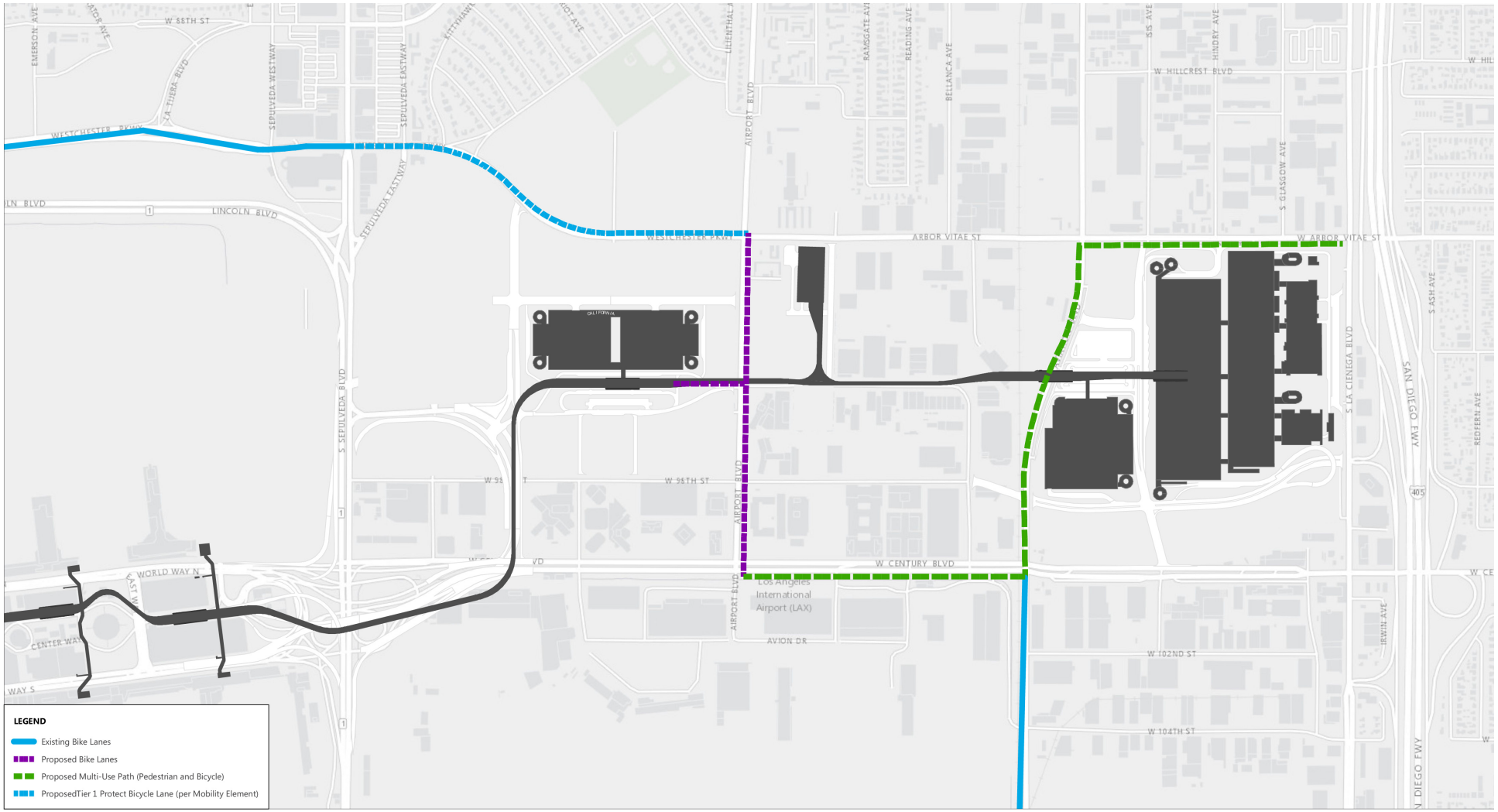


FIGURE 8
EXISTING AND PLANNED BICYCLE FACILITIES

RAJU Associates, Inc.

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6. The first paragraph under the Existing Transit Service section on page 430 of Appendix O of the Draft EIR is hereby revised as follows:

> Various transit providers including Metro, LADOT, Santa Monica Big Blue Bus, Culver City Transit, City of Torrance and Beach Cities Transit provide service within the Study Area. Table 5 ~~and Figure 9~~ summarizing the various bus transit lines operating in the Study Area can be found in Chapter II of this report. *Table 5 provides details of existing transit serving the study area including the following:*
>
> - *Provider name*
> - *Line number*
> - *One-way route length*
> - *Average daily riders*
> - *Service area*
> - *Direction*
> - *Service type*
> - *Hours of operation*
> - *AM / MD / PM peak hours' frequency of service*
>
> Currently, 15 bus lines and the Metro Green Line operate in the vicinity of the Project Site.
>
> *Figure 9 presents various transit lines within the Project vicinity. Chapter II in Appendix O provides a detailed description of existing transit service including the Metro LAX/Crenshaw Light Rail Transit line under construction.*

7. The first paragraph under the Project Trip Generation Estimates section beginning on page 430 of Appendix O of the Draft EIR is hereby revised as follows:

> Given that the Project is not a development project and consists of roadway improvements and construction of facilities (ITF's and CONRAC) that would accommodate the anticipated growth at LAX, the Project would not generate any additional new trips. In fact, the Project would reduce the number of trips on the street system under Baseline (2015) with Project, Future (2024) with Phase 1 Project and Future (2035) with Project conditions as shown in Tables 19-21 in Chapter V and not generate any additional transit trips. ~~Therefore, no further transit impact analysis is required by the Project under Baseline (2015) with Project, Future (2024) with Phase 1 Project and Future (2035) with Project conditions.~~

8. The following discussion is hereby added after the first paragraph on page 431 of Appendix O of the Draft EIR:

***Project Transit Trip Estimates***

*Since the proposed Project would encourage transit usage, provide connectivity to the regional transit and multi-modal hub, and provide improvements as part of the TDM Program including possibly, an Employee Shuttle Program, an increase in transit ridership is anticipated. The transit trip generation estimates due to the proposed Project are projected to be 2,142 trips and 2,506 trips in the future years 2024 and 2035, respectively. These transit trip estimates include anticipated ridership on the regional transit system that also use the APM system and the Project's Employee Shuttle Program.*

***Project Provisions and Programs to encourage Public Transit Use***

*The proposed Project would encourage public transit usage by providing the following key elements:*

- *Connectivity to the regional transit system and multi-modal hub by providing an Automated People Mover (APM) System with strategically-located stations (See DEIR Section 2.0, Project Description for more details),*
- *Facilities such as CONRAC, ITF W and ITF E connected to the regional system via the APM; and*
- *Several key improvements as part of the TDM Program including an Employee Shuttle Program (See Appendix O, Chapter VI for more detail).*

***Project Transit Impact Analysis***

*There is no established CMP threshold of significance regarding transit impacts; however, for the purposes of this EIR, a significant impact is considered to occur if implementation of the proposed Project would result in a substantial increase in transit demand compared to the capacity of transit lines serving the Project area.*

*Table TR-1 summarizes the transit impact analysis associated with all transit routes (shown in Table 5) serving LAX and its vicinity. The table evaluates and summarizes key elements used in transit impact analysis such as the total daily ridership of all transit lines serving LAX and its vicinity, total available capacity of all these transit routes, average daily ridership to capacity ratios and whether residual capacity would be available under the following scenarios - Existing conditions without and with proposed LAMP Project, Future (2024) conditions without and with proposed LAMP Phase 1 Project and Future (2035) conditions without and with the buildout of the proposed LAMP Project.*

*It can be observed from the transit impact analysis table that the existing average daily route ridership of all routes serving LAX and its vicinity is approximately 115,546 riders with residual capacity available throughout the day. With the Proposed Project in place, the average daily*

*ridership is estimated to increase to 117,545 riders; however, there would continue to be adequate capacity available on a daily basis with the proposed LAMP Project. The ratios of Average Daily Ridership to Capacity for the without and with Project conditions indicate that the proposed Project would not result in substantial increase in transit demand compared to the capacity of transit lines serving the Project area. Therefore, transit impacts due to the Project would be less than significant under the Existing plus Project scenario because there would be no substantial increase in transit demand compared to capacity of transit lines serving the Project area.*

*Similarly, the Future (2024) without Project average daily ridership is projected to be 139,093 riders with residual capacity available. With proposed LAMP Phase 1 Project in the Future Year 2024, the average daily ridership is projected to increase to 141,235 riders; however, there would continue to be adequate capacity available on a daily basis. The ratios of Average Daily Ridership to Capacity for the without and with Project conditions indicate that the proposed Project would not result in substantial increase in transit demand compared to the capacity of transit lines serving the Project area. Therefore, transit impacts due to Phase 1 of the Project would be less than significant because there would be no substantial increase in transit demand compared to capacity of transit lines serving the Project area.*

*The table also presents the Future (2035) without Project average daily ridership to be 151,804 riders with residual capacity throughout the day. With buildout of LAMP Project in 2035, the average daily ridership is projected to increase to 154,310 riders. However, adequate transit capacity would continue to be available even with the overall Proposed LAMP Project in place. The ratios of Average Daily Ridership to Capacity for the without and with Project conditions indicate that the proposed Project would not result in substantial increase in transit demand compared to the capacity of transit lines serving the Project area and, consequently, no significant transit impacts would occur because there would be no substantial increase in transit demand compared to capacity of transit lines serving the Project area.*

***Project Mitigation Measures***

*Since the LAMP Project would not cause any significant transit impacts, no transit mitigation measures are required.*

9. Table TR-1: Transit Impact Analysis is hereby added after page 430 of Appendix O of the Draft EIR. Please see the following table.

10. Table 111: Summary of Intersection Level of Service Analysis – Alternative 3: Reduced Phase 1 Roadway Improvements in the section titled Alternative 3 – Reduced Phase 1 Roadway Improvements Alternative on pages 613 through 618 of Appendix O of the Draft EIR is hereby revised. Please see the following revised table.

**TABLE TR-1**
**TRANSIT IMPACT ANALYSIS**

| | Average Daily Route Ridership (All Routes)* | Daily Capacity for All Routes* | Average Daily Ridership to Capacity | Residual Capacity Available |
|---|---|---|---|---|
| Existing Conditions - Transit System* Total | 115,546 | 357,200 | 0.32 | Yes |
| Existing with Project Conditions - Transit System* Total | 117,545 | 357,200 | 0.33 | Yes |

* Includes all routes serving LAX and its vicinity as shown in updated (corrections/additions) Table 5 of Appendix O - Draft Transportation Study. However, for the purposes of this analysis, the route capacities associated with the APM system and /or employee shuttle program have not been included, conservatively, although the anticipated regional transit ridership utilizing these project provisions are included in the daily ridership estimates.

| | Average Daily Route Ridership (All Routes)* | Daily Capacity for All Routes* | Average Daily Ridership to Capacity | Residual Capacity Available |
|---|---|---|---|---|
| Future (2024) without Project - Transit System* Total | 139,093 | 393,815 | 0.35 | Yes |
| Future (2024) with Phase 1 Project - Transit System* Total | 141,235 | 393,815 | 0.36 | Yes |

* Includes all routes serving LAX and its vicinity as shown in updated (corrections/additions) Table 5 of Appendix O - Draft Transportation Study and the future Metro Crenshaw/LAX Line LRT. However, for the purposes of this analysis, the route capacities associated with the APM system and /or employee shuttle program have not been included, conservatively, although the anticipated regional transit ridership utilizing these project provisions are included in the daily ridership estimates.

| | Average Daily Route Ridership (All Routes)* | Daily Capacity for All Routes* | Average Daily Ridership to Capacity | Residual Capacity Available |
|---|---|---|---|---|
| Future (2035) without Project - Transit System* Total | 151,804 | 393,815 | 0.39 | Yes |
| Future (2035) with Project - Transit System* Total | 154,310 | 393,815 | 0.39 | Yes |

* Includes all routes serving LAX and its vicinity as shown in updated (corrections/additions) Table 5 of Appendix O - Draft Transportation Study and the future Metro Crenshaw/LAX Line LRT. However, for the purposes of this analysis, the route capacities associated with the APM system and /or employee shuttle program have not been included, conservatively, although the anticipated regional transit ridership utilizing these project provisions are included in the daily ridership estimates.

**TABLE 111 (continued)**
**SUMMARY OF INTERSECTION LEVEL OF SERVICE ANALYSIS - ALTERNATIVE 3: REDUCED PHASE 1 ROADWAY IMPROVEMENTS**

| MAP # | INTERSECTION | PEAK HOUR | FUTURE (2024) WITHOUT PROJECT CONDITIONS | | FUTURE (2024) WITH PHASE 1 PROJECT CONDITIONS - ALTERNATIVE 3 | | | | FUTURE (2024) WITH PHASE 1 PROJECT AND MITIGATION CONDITIONS - ALTERNATIVE 3 | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | V/C OR DELAY | LOS | V/C OR DELAY | LOS | CHANGE IN V/C | SIGNIFICANT IMPACT | V/C OR DELAY | LOS | CHANGE IN V/C | SIGNIFICANT IMPACT |
| 1 | Ocean Avenue/Via Marina & Washington Boulevard | AM | 0.649 | B | 0.647 | B | -0.002 | No | 0.645 | B | -0.004 | No |
| | | PM | 0.831 | D | 0.827 | D | -0.004 | No | 0.826 | D | -0.005 | No |
| 2 | Vista del Mar/Vista del Mar Lane & Culver Boulevard | AM | 0.822 | D | 0.813 | D | -0.009 | No | 0.813 | D | -0.009 | No |
| | | PM | 0.750 | C | 0.736 | C | -0.014 | No | 0.736 | C | -0.014 | No |
| 3 | Vista del Mar & Imperial Highway | AM | 0.539 | A | 0.528 | A | -0.011 | No | 0.528 | A | -0.011 | No |
| | | PM | 0.543 | A | 0.534 | A | -0.009 | No | 0.533 | A | -0.010 | No |
| 4 | Vista del Mar & Grand Avenue | AM | 0.689 | B | 0.682 | B | -0.007 | No | 0.682 | B | -0.007 | No |
| | | PM | 0.548 | A | 0.540 | A | -0.008 | No | 0.539 | A | -0.009 | No |
| 5 | Highland Avenue/Vista del Mar & Rosecrans Avenue | AM | 0.956 | E | 0.949 | E | -0.007 | No | 0.949 | E | -0.007 | No |
| | | PM | 0.890 | D | 0.876 | D | -0.014 | No | 0.876 | D | -0.014 | No |
| 6 | Nicholson Street & Culver Boulevard | AM | 0.734 | C | 0.726 | C | -0.008 | No | 0.722 | C | -0.012 | No |
| | | PM | 0.863 | D | 0.856 | D | -0.007 | No | 0.855 | D | -0.008 | No |
| 7 | Pershing Drive & Manchester Avenue | AM | 0.453 | A | 0.449 | A | -0.004 | No | 0.448 | A | -0.005 | No |
| | | PM | 0.497 | A | 0.498 | A | 0.001 | No | 0.496 | A | -0.001 | No |
| 8 | Pershing Drive & Westchester Parkway | AM | 0.459 | A | 0.456 | A | -0.003 | No | 0.454 | A | -0.005 | No |
| | | PM | 0.313 | A | 0.306 | A | -0.007 | No | 0.305 | A | -0.008 | No |
| 9 | Pershing Drive & Imperial Highway | AM | 0.528 | A | 0.520 | A | -0.008 | No | 0.515 | A | -0.013 | No |
| | | PM | 0.460 | A | 0.444 | A | -0.016 | No | 0.441 | A | -0.019 | No |
| 10 | Culver Boulevard & Jefferson Boulevard | AM | 0.763 | C | 0.761 | C | -0.002 | No | 0.759 | C | -0.004 | No |
| | | PM | 0.895 | D | 0.885 | D | -0.010 | No | 0.885 | D | -0.010 | No |
| 11 | Main Street & Imperial Highway | AM | 0.685 | B | 0.686 | B | 0.001 | No | 0.684 | B | -0.001 | No |
| | | PM | 0.619 | B | 0.624 | B | 0.005 | No | 0.621 | B | 0.002 | No |
| 12 | Lincoln Boulevard & Venice Boulevard [1] | AM | 0.931 | E | 0.934 | E | 0.003 | No | 0.934 | E | 0.003 | No |
| | | PM | 0.915 | E | 0.911 | E | -0.004 | No | 0.911 | E | -0.004 | No |
| 13 | Lincoln Boulevard & Washington Boulevard | AM | 0.915 | E | 0.914 | E | -0.001 | No | 0.914 | E | -0.001 | No |
| | | PM | 0.863 | D | 0.864 | D | 0.001 | No | 0.864 | D | 0.001 | No |
| 14 | Lincoln Boulevard & SR-90 Ramps [1] | AM | 0.666 | B | 0.669 | B | 0.003 | No | 0.669 | B | 0.003 | No |
| | | PM | 0.667 | B | 0.664 | B | -0.003 | No | 0.664 | B | -0.003 | No |
| 15 | Lincoln Boulevard & Bali Way | AM | 0.578 | A | 0.578 | A | 0.000 | No | 0.578 | A | 0.000 | No |
| | | PM | 0.619 | B | 0.620 | B | 0.001 | No | 0.619 | B | 0.000 | No |
| 16 | Lincoln Boulevard & Mindanao Way | AM | 0.773 | C | 0.775 | C | 0.002 | No | 0.774 | C | 0.001 | No |
| | | PM | 0.849 | D | 0.857 | D | 0.008 | No | 0.857 | D | 0.008 | No |
| 17 | Lincoln Boulevard & Fiji Way | AM | 0.672 | B | 0.671 | B | -0.001 | No | 0.670 | B | -0.002 | No |
| | | PM | 0.791 | C | 0.800 | D | 0.009 | No | 0.800 | D | 0.009 | No |
| 18 | Lincoln Boulevard & Jefferson Boulevard | AM | 0.838 | D | 0.839 | D | 0.001 | No | 0.839 | D | 0.001 | No |
| | | PM | 0.700 | B | 0.699 | B | -0.001 | No | 0.699 | B | -0.001 | No |
| 19 | Lincoln Boulevard & Bluff Creek Drive | AM | 0.636 | B | 0.639 | B | 0.003 | No | 0.639 | B | 0.003 | No |
| | | PM | 0.517 | A | 0.520 | A | 0.003 | No | 0.519 | A | 0.002 | No |
| 20 | Lincoln Boulevard & Loyola Marymount University Drive | AM | 0.722 | C | 0.728 | C | 0.006 | No | 0.728 | C | 0.006 | No |
| | | PM | 0.646 | B | 0.662 | B | 0.016 | No | 0.662 | B | 0.016 | No |
| 21 | Lincoln Boulevard & 83rd Street | AM | 1.043 | F | 1.049 | F | 0.006 | No | 1.049 | F | 0.006 | No |
| | | PM | 0.742 | C | 0.748 | C | 0.006 | No | 0.747 | C | 0.005 | No |
| 22 | Lincoln Boulevard & Manchester Avenue [1] | AM | 0.859 | D | 0.866 | D | 0.007 | No | 0.866 | D | 0.007 | No |
| | | PM | 0.781 | C | 0.777 | C | -0.004 | No | 0.776 | C | -0.005 | No |
| 23 | Lincoln Boulevard & La Tijera Boulevard | AM | 0.414 | A | 0.427 | A | 0.013 | No | 0.427 | A | 0.013 | No |
| | | PM | 0.429 | A | 0.468 | A | 0.039 | No | 0.467 | A | 0.038 | No |
| 24 | Centinela Avenue & Venice Boulevard [1] | AM | 0.961 | E | 0.961 | E | 0.000 | No | 0.961 | E | 0.000 | No |
| | | PM | 0.891 | D | 0.891 | D | 0.000 | No | 0.891 | D | 0.000 | No |
| 25 | Centinela Avenue & Washington Place | AM | 0.835 | D | 0.836 | D | 0.001 | No | 0.836 | D | 0.001 | No |
| | | PM | 0.957 | E | 0.957 | E | 0.000 | No | 0.957 | E | 0.000 | No |
| 26 | Centinela Avenue & Washington Boulevard | AM | 0.888 | D | 0.889 | D | 0.001 | No | 0.889 | D | 0.001 | No |
| | | PM | 0.989 | E | 0.990 | E | 0.001 | No | 0.990 | E | 0.001 | No |
| 27 | Centinela Avenue & Culver Boulevard | AM | 0.955 | E | 0.956 | E | 0.001 | No | 0.956 | E | 0.001 | No |
| | | PM | 1.080 | F | 1.081 | F | 0.001 | No | 1.081 | F | 0.001 | No |
| 28 | Centinela Avenue & Sandford/SR-90 Westbound Ramps | AM | 0.552 | A | 0.553 | A | 0.001 | No | 0.553 | A | 0.001 | No |
| | | PM | 0.501 | A | 0.501 | A | 0.000 | No | 0.501 | A | 0.000 | No |
| 29 | Centinela Avenue & SR-90 Eastbound On-/Off-Ramps | AM | 0.695 | B | 0.691 | B | -0.004 | No | 0.691 | B | -0.004 | No |
| | | PM | 0.487 | A | 0.490 | A | 0.003 | No | 0.490 | A | 0.003 | No |
| 30 | Centinela Avenue & Jefferson Boulevard | AM | 0.930 | E | 0.928 | E | -0.002 | No | 0.928 | E | -0.002 | No |
| | | PM | 0.791 | C | 0.774 | C | -0.017 | No | 0.774 | C | -0.017 | No |
| 31 | Inglewood Boulevard-Centinela Avenue & Jefferson Boulevard | AM | 0.788 | C | 0.791 | C | 0.003 | No | 0.791 | C | 0.003 | No |
| | | PM | 0.819 | D | 0.826 | D | 0.007 | No | 0.826 | D | 0.007 | No |
| 32 | Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps | AM | 0.860 | D | 0.861 | D | 0.001 | No | 0.861 | D | 0.001 | No |
| | | PM | 0.940 | E | 0.940 | E | 0.000 | No | 0.940 | E | 0.000 | No |
| 33 | Sawtelle Boulevard & Washington Place | AM | 0.615 | B | 0.618 | B | 0.003 | No | 0.618 | B | 0.003 | No |
| | | PM | 0.688 | B | 0.691 | B | 0.003 | No | 0.691 | B | 0.003 | No |
| 34 | Sawtelle Boulevard & Washington Boulevard | AM | 0.683 | B | 0.683 | B | 0.000 | No | 0.683 | B | 0.000 | No |
| | | PM | 0.773 | C | 0.773 | C | 0.000 | No | 0.773 | C | 0.000 | No |
| 35 | Sawtelle Boulevard & Culver Boulevard | AM | 0.774 | C | 0.776 | C | 0.002 | No | 0.776 | C | 0.002 | No |
| | | PM | 0.938 | E | 0.939 | E | 0.001 | No | 0.939 | E | 0.001 | No |
| 36 | I-405 Southbound Ramps & Jefferson Boulevard | AM | 0.674 | B | 0.671 | B | -0.003 | No | 0.671 | B | -0.003 | No |
| | | PM | 0.583 | A | 0.582 | A | -0.001 | No | 0.582 | A | -0.001 | No |
| 37 | I-405 Northbound Ramps & Jefferson Boulevard | AM | 0.968 | E | 0.969 | E | 0.001 | No | 0.969 | E | 0.001 | No |
| | | PM | 0.786 | C | 0.788 | C | 0.002 | No | 0.788 | C | 0.002 | No |
| 38 | Slauson Avenue & Jefferson Boulevard | AM | 0.477 | A | 0.478 | A | 0.001 | No | 0.478 | A | 0.001 | No |
| | | PM | 0.509 | A | 0.509 | A | 0.000 | No | 0.508 | A | -0.001 | No |
| 39 | Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps | AM | 0.755 | C | 0.755 | C | 0.000 | No | 0.755 | C | 0.000 | No |
| | | PM | 0.981 | E | 0.981 | E | 0.000 | No | 0.981 | E | 0.000 | No |
| 40 | Sepulveda Boulevard & Washington Place | AM | 0.899 | D | 0.900 | D | 0.001 | No | 0.900 | D | 0.001 | No |
| | | PM | 0.882 | D | 0.882 | D | 0.000 | No | 0.882 | D | 0.000 | No |
| 41 | Sepulveda Boulevard & Washington Boulevard | AM | 0.803 | D | 0.803 | D | 0.000 | No | 0.803 | D | 0.000 | No |
| | | PM | 0.850 | D | 0.851 | D | 0.001 | No | 0.851 | D | 0.001 | No |
| 42 | Sepulveda Boulevard & Culver Boulevard | AM | 0.932 | E | 0.933 | E | 0.001 | No | 0.933 | E | 0.001 | No |
| | | PM | 0.914 | E | 0.914 | E | 0.000 | No | 0.914 | E | 0.000 | No |
| 43 | Sepulveda Boulevard & Braddock Drive | AM | 0.705 | C | 0.706 | C | 0.001 | No | 0.706 | C | 0.001 | No |
| | | PM | 0.715 | C | 0.715 | C | 0.000 | No | 0.715 | C | 0.000 | No |
| 44 | Overland Avenue & Venice Boulevard [1] | AM | 0.885 | D | 0.885 | D | 0.000 | No | 0.885 | D | 0.000 | No |
| | | PM | 0.923 | E | 0.923 | E | 0.000 | No | 0.923 | E | 0.000 | No |
| 45 | Overland Avenue & Washington Boulevard | AM | 0.871 | D | 0.872 | D | 0.001 | No | 0.872 | D | 0.001 | No |
| | | PM | 1.056 | F | 1.056 | F | 0.000 | No | 1.056 | F | 0.000 | No |
| 46 | Overland Avenue & Culver Boulevard | AM | 1.002 | F | 1.003 | F | 0.001 | No | 1.003 | F | 0.001 | No |
| | | PM | 0.954 | E | 0.955 | E | 0.001 | No | 0.955 | E | 0.001 | No |

**TABLE 111 (continued)**
**SUMMARY OF INTERSECTION LEVEL OF SERVICE ANALYSIS - ALTERNATIVE 3: REDUCED PHASE 1 ROADWAY IMPROVEMENTS**

| MAP # | INTERSECTION | PEAK HOUR | FUTURE (2024) WITHOUT PROJECT CONDITIONS | | FUTURE (2024) WITH PHASE 1 PROJECT CONDITIONS - ALTERNATIVE 3 | | | | FUTURE (2024) WITH PHASE 1 PROJECT AND MITIGATION CONDITIONS - ALTERNATIVE 3 | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | V/C OR DELAY | LOS | V/C OR DELAY | LOS | CHANGE IN V/C | SIGNIFICANT IMPACT | V/C OR DELAY | LOS | CHANGE IN V/C | SIGNIFICANT IMPACT |
| 47 | Duquesne Avenue & Washington Boulevard | AM | 0.606 | B | 0.606 | B | 0.000 | No | 0.606 | B | 0.000 | No |
| | | PM | 0.722 | C | 0.723 | C | 0.001 | No | 0.723 | C | 0.001 | No |
| 48 | Duquesne Avenue & Culver Boulevard | AM | 0.675 | B | 0.675 | B | 0.000 | No | 0.675 | B | 0.000 | No |
| | | PM | 0.710 | C | 0.710 | C | 0.000 | No | 0.710 | C | 0.000 | No |
| 49 | Culver Boulevard & Washington Boulvard-Irving Place | AM | 0.700 | B | 0.700 | B | 0.000 | No | 0.700 | B | 0.000 | No |
| | | PM | 0.722 | C | 0.722 | C | 0.000 | No | 0.722 | C | 0.000 | No |
| 50 | Duquesne Avenue & Jefferson Boulevard | AM | 0.859 | D | 0.859 | D | 0.000 | No | 0.859 | D | 0.000 | No |
| | | PM | 0.824 | D | 0.824 | D | 0.000 | No | 0.824 | D | 0.000 | No |
| 51 | Overland Avenue & Jefferson Boulevard | AM | 0.828 | D | 0.830 | D | 0.002 | No | 0.830 | D | 0.002 | No |
| | | PM | 0.893 | D | 0.894 | D | 0.001 | No | 0.894 | D | 0.001 | No |
| 52 | Sepulveda Boulevard & Jefferson Boulevard | AM | 0.612 | B | 0.613 | B | 0.001 | No | 0.612 | B | 0.000 | No |
| | | PM | 0.635 | B | 0.635 | B | 0.000 | No | 0.635 | B | 0.000 | No |
| 53 | Sepulveda Boulevard & Sawtelle Boulevard | AM | 0.688 | B | 0.689 | B | 0.001 | No | 0.689 | B | 0.001 | No |
| | | PM | 0.784 | C | 0.785 | C | 0.001 | No | 0.785 | C | 0.001 | No |
| 54 | Sepulveda Boulevard & Jefferson Boulevard & Playa Street | AM | 0.902 | E | 0.904 | E | 0.002 | No | 0.904 | E | 0.002 | No |
| | | PM | 0.777 | C | 0.777 | C | 0.000 | No | 0.776 | C | -0.001 | No |
| 55 | Sepulveda Boulevard & Slauson Avenue | AM | 0.719 | C | 0.721 | C | 0.002 | No | 0.721 | C | 0.002 | No |
| | | PM | 0.713 | C | 0.714 | C | 0.001 | No | 0.713 | C | 0.000 | No |
| 56 | Sepulveda Boulevard & Centinela Avenue | AM | 0.845 | D | 0.842 | D | -0.003 | No | 0.841 | D | -0.004 | No |
| | | PM | 1.074 | F | 1.082 | F | 0.008 | No | 1.081 | F | 0.007 | No |
| 57 | Sepulveda Boulevard & Howard Hughes Parkway | AM | 0.811 | D | 0.807 | D | -0.004 | No | 0.805 | D | -0.006 | No |
| | | PM | 0.687 | B | 0.697 | B | 0.010 | No | 0.695 | B | 0.008 | No |
| 58 | Sepulveda Boulevard & 76th Street-77th Street | AM | 0.819 | D | 0.837 | D | 0.018 | No | 0.835 | D | 0.016 | No |
| | | PM | 0.647 | B | 0.649 | B | 0.002 | No | 0.647 | B | 0.000 | No |
| 59 | Sepulveda Boulevard & 79th Street-80th Street | AM | 0.707 | C | 0.744 | C | 0.037 | No | 0.743 | C | 0.036 | No |
| | | PM | 0.529 | A | 0.539 | A | 0.010 | No | 0.537 | A | 0.008 | No |
| 60 | Sepulveda Boulevard & 83rd Street | AM | 0.572 | A | 0.583 | A | 0.011 | No | 0.581 | A | 0.009 | No |
| | | PM | 0.504 | A | 0.512 | A | 0.008 | No | 0.510 | A | 0.006 | No |
| 61 | Sepulveda Boulevard & Manchester Avenue [1] | AM | 0.736 | C | 0.733 | C | -0.003 | No | 0.732 | C | -0.004 | No |
| | | PM | 0.917 | E | 0.901 | E | -0.016 | No | 0.899 | D | -0.018 | No |
| 62 | Sepulveda Boulevard & La Tijera Boulevard | AM | 0.579 | A | 0.593 | A | 0.014 | No | 0.591 | A | 0.012 | No |
| | | PM | 0.677 | B | 0.696 | B | 0.019 | No | 0.693 | B | 0.016 | No |
| 63 | Sepulveda Boulevard & Westchester Parkway | AM | 0.768 | C | 0.799 | C | 0.031 | No | 0.797 | C | 0.029 | No |
| | | PM | 0.914 | E | 0.880 | D | -0.034 | No | 0.878 | D | -0.036 | No |
| 64 | Sepulveda Boulevard & Lincoln Boulevard [1] | AM | 0.645 | B | 0.659 | B | 0.014 | No | 0.659 | B | 0.014 | No |
| | | PM | 0.692 | B | 0.688 | B | -0.004 | No | 0.687 | B | -0.005 | No |
| 65 | Sepulveda Boulevard & Century Boulevard | AM | 0.789 | C | 0.756 | C | -0.033 | No | 0.757 | C | -0.032 | No |
| | | PM | 0.834 | D | 0.803 | D | -0.031 | No | 0.798 | C | -0.036 | No |
| 66 | Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway) | AM | 1.085 | F | 1.055 | F | -0.030 | No | 1.049 | F | -0.036 | No |
| | | PM | 0.973 | E | 0.941 | E | -0.032 | No | 0.929 | E | -0.044 | No |
| 67 | Sepulveda Boulevard & Imperial Highway | AM | 0.769 | C | 0.738 | C | -0.031 | No | 0.725 | C | -0.044 | No |
| | | PM | 0.910 | E | 0.856 | D | -0.054 | No | 0.851 | D | -0.059 | No |
| 68 | Sepulveda Boulevard & Mariposa Avenue | AM | 0.886 | D | 0.884 | D | -0.002 | No | 0.883 | D | -0.003 | No |
| | | PM | 0.835 | D | 0.835 | D | 0.000 | No | 0.834 | D | -0.001 | No |
| 69 | Sepulveda Boulevard & Grand Avenue | AM | 1.146 | F | 1.144 | F | -0.002 | No | 1.144 | F | -0.002 | No |
| | | PM | 0.983 | E | 0.989 | E | 0.006 | No | 0.988 | E | 0.005 | No |
| 70 | Sepulveda Boulevard & El Segundo Boulevard [1] | AM | 0.840 | D | 0.844 | D | 0.004 | No | 0.843 | D | 0.003 | No |
| | | PM | 1.036 | F | 1.033 | F | -0.003 | No | 1.032 | F | -0.004 | No |
| 71 | Sepulveda Boulevard & Rosecrans Avenue [1] | AM | 1.046 | F | 1.044 | F | -0.002 | No | 1.043 | F | -0.003 | No |
| | | PM | 1.055 | F | 1.052 | F | -0.003 | No | 1.051 | F | -0.004 | No |
| 72 | SR-90 Westbound Ramps & Slauson Avenue | AM | 0.769 | C | 0.768 | C | -0.001 | No | 0.768 | C | -0.001 | No |
| | | PM | 0.791 | C | 0.792 | C | 0.001 | No | 0.792 | C | 0.001 | No |
| 73 | Buckingham Parkway & Slauson Avenue | AM | 0.846 | D | 0.844 | D | -0.002 | No | 0.844 | D | -0.002 | No |
| | | PM | 0.808 | D | 0.805 | D | -0.003 | No | 0.805 | D | -0.003 | No |
| 74 | I-405 Southbound Ramps & Howard Hughes Parkway | AM | 0.444 | A | 0.442 | A | -0.002 | No | 0.438 | A | -0.006 | No |
| | | PM | 0.231 | A | 0.224 | A | -0.007 | No | 0.221 | A | -0.010 | No |
| 75 | Sepulveda Eastway & Westchester Parkway | AM | 0.450 | A | 0.472 | A | 0.022 | No | 0.471 | A | 0.021 | No |
| | | PM | 0.727 | C | 0.723 | C | -0.004 | No | 0.721 | C | -0.006 | No |
| 76 | La Tijera Boulevard & Manchester Avenue | AM | 0.562 | A | 0.579 | A | 0.017 | No | 0.579 | A | 0.017 | No |
| | | PM | 0.624 | B | 0.600 | A | -0.024 | No | 0.599 | A | -0.025 | No |
| 77 | Jenny Avenue & Westchester Parkway | AM | 0.208 | A | 0.351 | A | 0.143 | No | 0.344 | A | 0.136 | No |
| | | PM | 0.432 | A | 0.397 | A | -0.035 | No | 0.404 | A | -0.028 | No |
| 78 | Avion Drive & Century Boulevard | AM | 0.436 | A | 0.460 | A | 0.024 | No | 0.463 | A | 0.027 | No |
| | | PM | 0.555 | A | 0.547 | A | -0.008 | No | 0.541 | A | -0.014 | No |
| 79 | La Tijera Boulevard & Airport Boulevard | AM | 0.522 | A | 0.560 | A | 0.038 | No | 0.419 | A | -0.103 | No |
| | | PM | 0.658 | B | 0.647 | B | -0.011 | No | 0.644 | B | -0.014 | No |
| 80 | Airport Boulevard & Manchester Avenue | AM | 0.607 | B | 0.640 | B | 0.033 | No | 0.637 | B | 0.030 | No |
| | | PM | 0.750 | C | 0.690 | B | -0.060 | No | 0.682 | B | -0.068 | No |
| 81 | Airport Boulevard & Arbor Vitae Street/Westchester Parkway | AM | 0.696 | B | 0.792 | C | 0.096 | **Yes** | 0.684 | B | -0.012 | No |
| | | PM | 1.032 | F | 0.930 | E | -0.102 | No | 0.864 | D | -0.168 | No |
| 82 | Airport Boulevard & 96th Street | AM | 0.311 | A | 0.454 | A | 0.143 | No | 0.452 | A | 0.141 | No |
| | | PM | 0.504 | A | 0.671 | B | 0.167 | No | 0.665 | B | 0.161 | No |
| 83 | Airport Boulevard & 98th Street | AM | 0.392 | A | 0.536 | A | 0.144 | No | 0.516 | A | 0.124 | No |
| | | PM | 0.561 | A | 0.705 | C | 0.144 | **Yes** | 0.697 | B | 0.136 | No |
| 84 | Airport Boulevard & Century Boulevard | AM | 0.611 | B | 0.672 | B | 0.061 | No | 0.554 | A | -0.057 | No |
| | | PM | 0.660 | B | 0.840 | D | 0.180 | **Yes** | 0.699 | B | 0.039 | No |
| 85 | Nash Street /I-105 Westbound Ramps & Imperial Highway | AM | 0.521 | A | 0.534 | A | 0.013 | No | 0.534 | A | 0.013 | No |
| | | PM | 0.446 | A | 0.424 | A | -0.022 | No | 0.424 | A | -0.022 | No |
| 86 | Nash Street & El Segundo Boulevard | AM | 0.635 | B | 0.640 | B | 0.005 | No | 0.640 | B | 0.005 | No |
| | | PM | 0.694 | B | 0.679 | B | -0.015 | No | 0.679 | B | -0.015 | No |
| 87 | Douglas Street & Imperial Highway | AM | 0.369 | A | 0.406 | A | 0.037 | No | 0.406 | A | 0.037 | No |
| | | PM | 0.706 | C | 0.707 | C | 0.001 | No | 0.707 | C | 0.001 | No |
| 88 | Douglas Street & El Segundo Boulevard | AM | 0.830 | D | 0.826 | D | -0.004 | No | 0.826 | D | -0.004 | No |
| | | PM | 0.967 | E | 0.963 | E | -0.004 | No | 0.963 | E | -0.004 | No |
| 89 | I-405 Northbound Ramps & La Tijera Boulevard | AM | 0.877 | D | 0.813 | D | -0.064 | No | 0.811 | D | -0.066 | No |
| | | PM | 0.842 | D | 0.787 | C | -0.055 | No | 0.785 | C | -0.057 | No |
| 90 | I-405 Southbound Ramps & La Tijera Boulevard | AM | 0.777 | C | 0.774 | C | -0.003 | No | 0.772 | C | -0.005 | No |
| | | PM | 0.906 | E | 0.819 | D | -0.087 | No | 0.814 | D | -0.092 | No |
| 91 | Bellanca Avenue & Century Boulevard | AM | 0.613 | B | 0.611 | B | -0.002 | No | 0.613 | B | 0.000 | No |
| | | PM | 0.688 | B | 0.695 | B | 0.007 | No | 0.700 | B | 0.012 | No |
| 92 | Aviation Boulevard/Florence Avenue & Manchester Avenue | AM | 0.749 | C | 0.705 | C | -0.044 | No | 0.700 | B | -0.049 | No |
| | | PM | 0.814 | D | 0.663 | B | -0.151 | No | 0.661 | B | -0.153 | No |

**TABLE 111 (continued)**
**SUMMARY OF INTERSECTION LEVEL OF SERVICE ANALYSIS - ALTERNATIVE 3: REDUCED PHASE 1 ROADWAY IMPROVEMENTS**

| MAP # | INTERSECTION | PEAK HOUR | FUTURE (2024) WITHOUT PROJECT CONDITIONS | | FUTURE (2024) WITH PHASE 1 PROJECT CONDITIONS - ALTERNATIVE 3 | | | | FUTURE (2024) WITH PHASE 1 PROJECT AND MITIGATION CONDITIONS - ALTERNATIVE 3 | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | V/C OR DELAY | LOS | V/C OR DELAY | LOS | CHANGE IN V/C | SIGNIFICANT IMPACT | V/C OR DELAY | LOS | CHANGE IN V/C | SIGNIFICANT IMPACT |
| 93 | Aviation Boulevard & Arbor Vitae Street | AM | 0.912 | E | 1.057 | F | 0.145 | **Yes** | 0.995 | E | 0.083 | **Yes** |
| | | PM | 0.792 | C | 0.974 | E | 0.182 | **Yes** | 0.836 | D | 0.044 | **Yes** |
| 94 | Aviation Boulevard & Century Boulevard | AM | 0.863 | D | 0.891 | D | 0.028 | **Yes** | 0.888 | D | 0.025 | **Yes** |
| | | PM | 1.013 | F | 1.029 | F | 0.016 | **Yes** | 1.027 | F | 0.014 | **Yes** |
| 95 | Aviation Boulevard & 104th Street | AM | 0.640 | B | 0.612 | B | -0.028 | No | 0.573 | A | -0.067 | No |
| | | PM | 0.784 | C | 0.744 | C | -0.040 | No | 0.705 | C | -0.079 | No |
| 96 | Aviation Boulevard & 111th Street | AM | 0.739 | C | 0.717 | C | -0.022 | No | 0.653 | B | -0.086 | No |
| | | PM | 0.731 | C | 0.760 | C | 0.029 | No | 0.706 | C | -0.025 | No |
| 97 | Aviation Boulevard & Imperial Highway | AM | 0.724 | C | 0.596 | A | -0.128 | No | 0.584 | A | -0.140 | No |
| | | PM | 0.865 | D | 0.864 | D | -0.001 | No | 0.863 | D | -0.002 | No |
| 98 | Aviation Boulevard & West 120th Street | AM | 0.821 | D | 0.814 | D | -0.007 | No | 0.814 | D | -0.007 | No |
| | | PM | 0.920 | E | 0.918 | E | -0.002 | No | 0.906 | E | -0.014 | No |
| 99 | Aviation Boulevard & El Segundo Boulevard | AM | 0.971 | E | 0.973 | E | 0.002 | No | 0.970 | E | -0.001 | No |
| | | PM | 1.063 | F | 1.060 | F | -0.003 | No | 1.059 | F | -0.004 | No |
| 100 | Aviation Boulevard & Rosecrans Avenue | AM | 1.001 | F | 0.998 | E | -0.003 | No | 0.998 | E | -0.003 | No |
| | | PM | 0.995 | E | 0.992 | E | -0.003 | No | 0.992 | E | -0.003 | No |
| 101 | Hindry Avenue & Manchester Boulevard | AM | 0.722 | C | 0.710 | C | -0.012 | No | 0.709 | C | -0.013 | No |
| | | PM | 0.790 | C | 0.663 | B | -0.127 | No | 0.663 | B | -0.127 | No |
| 102 | Hindry Avenue & Arbor Vitae Street [2] | AM | 23.4 s | C | 0.577 | A | -0.111 | No | 0.574 | A | -0.114 | No |
| | | PM | 18.0 s | C | 0.514 | A | -0.095 | No | 0.511 | A | -0.098 | No |
| 103 | Concourse Way & Century Boulevard | AM | 0.306 | A | 0.664 | B | 0.358 | No | 0.677 | B | 0.371 | No |
| | | PM | 0.466 | A | 0.641 | B | 0.175 | No | 0.651 | B | 0.185 | No |
| 104 | I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway | AM | 0.781 | C | 0.770 | C | -0.011 | No | 0.763 | C | -0.018 | No |
| | | PM | 0.679 | B | 0.691 | B | 0.012 | No | 0.691 | B | 0.012 | No |
| 105 | La Tijera Boulevard & Centinela Avenue | AM | 0.857 | D | 0.845 | D | -0.012 | No | 0.843 | D | -0.014 | No |
| | | PM | 0.917 | E | 0.888 | D | -0.029 | No | 0.883 | D | -0.034 | No |
| 106 | Jefferson Boulevard & National Boulevard | AM | 0.990 | E | 0.988 | E | -0.002 | No | 0.988 | E | -0.002 | No |
| | | PM | 0.872 | D | 0.868 | D | -0.004 | No | 0.868 | D | -0.004 | No |
| 107 | Jefferson Boulevard & Higuera Street/Rodeo Road | AM | 0.694 | B | 0.692 | B | -0.002 | No | 0.692 | B | -0.002 | No |
| | | PM | 0.763 | C | 0.761 | C | -0.002 | No | 0.761 | C | -0.002 | No |
| 108 | La Cienega Boulevard & Jefferson Boulevard [1] | AM | 0.967 | E | 0.964 | E | -0.003 | No | 0.964 | E | -0.003 | No |
| | | PM | 1.016 | F | 1.018 | F | 0.002 | No | 1.018 | F | 0.002 | No |
| 109 | La Cienega Boulevard & Rodeo Road | AM | 1.248 | F | 1.245 | F | -0.003 | No | 1.245 | F | -0.003 | No |
| | | PM | 1.153 | F | 1.152 | F | -0.001 | No | 1.152 | F | -0.001 | No |
| 110 | La Cienega Boulevard & Stocker Street [1] | AM | 1.138 | F | 1.136 | F | -0.002 | No | 1.135 | F | -0.003 | No |
| | | PM | 1.182 | F | 1.178 | F | -0.004 | No | 1.177 | F | -0.005 | No |
| 111 | La Cienega Boulevard Southbound Ramps & Slauson Avenue | AM | 1.245 | F | 1.241 | F | -0.004 | No | 1.241 | F | -0.004 | No |
| | | PM | 1.154 | F | 1.154 | F | 0.000 | No | 1.154 | F | 0.000 | No |
| 112 | La Cienega Boulevard Northbound Ramps & Slauson Avenue | AM | 1.091 | F | 1.092 | F | 0.001 | No | 1.092 | F | 0.001 | No |
| | | PM | 0.986 | E | 0.985 | E | -0.001 | No | 0.984 | E | -0.002 | No |
| 113 | La Cienega Boulevard & La Tijera Boulevard | AM | 0.611 | B | 0.609 | B | -0.002 | No | 0.609 | B | -0.002 | No |
| | | PM | 0.720 | C | 0.714 | C | -0.006 | No | 0.711 | C | -0.009 | No |
| 114 | La Cienega Boulevard & Centinela Avenue [1] | AM | 0.970 | E | 0.962 | E | -0.008 | No | 0.962 | E | -0.008 | No |
| | | PM | 1.115 | F | 1.104 | F | -0.011 | No | 1.104 | F | -0.011 | No |
| 115 | La Cienega Boulevard & Florence Avenue | AM | 0.769 | C | 0.789 | C | 0.020 | No | 0.688 | B | -0.081 | No |
| | | PM | 1.125 | F | 1.153 | F | 0.028 | **Yes** | 1.052 | F | -0.073 | No |
| 116 | La Cienega Boulevard & Manchester Boulevard | AM | 0.749 | C | 0.814 | D | 0.065 | No | 0.714 | C | -0.035 | No |
| | | PM | 0.838 | D | 0.956 | E | 0.118 | No | 0.856 | D | 0.018 | No |
| 117 | La Cienega Boulevard & Arbor Vitae Street | AM | 0.813 | D | 1.014 | F | 0.201 | **Yes** | 0.909 | E | 0.096 | No |
| | | PM | 0.806 | D | 0.943 | E | 0.137 | No | 0.853 | D | 0.047 | No |
| 118 | La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Bl) | AM | 0.783 | C | 0.630 | B | -0.153 | No | 0.627 | B | -0.156 | No |
| | | PM | 0.642 | B | 0.471 | A | -0.171 | No | 0.500 | A | -0.142 | No |
| 119 | La Cienega Boulevard & Century Boulevard | AM | 0.930 | E | 1.035 | F | 0.105 | **Yes** | 0.872 | D | -0.058 | No |
| | | PM | 0.915 | E | 0.973 | E | 0.058 | **Yes** | 0.913 | E | -0.002 | No |
| 120 | La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Bl) | AM | 0.362 | A | 0.343 | A | -0.019 | No | 0.308 | A | -0.054 | No |
| | | PM | 0.343 | A | 0.368 | A | 0.025 | No | 0.371 | A | 0.028 | No |
| 121 | La Cienega Boulevard & 104th Street | AM | 0.406 | A | 0.414 | A | 0.008 | No | 0.414 | A | 0.008 | No |
| | | PM | 0.419 | A | 0.413 | A | -0.006 | No | 0.412 | A | -0.007 | No |
| 122 | La Cienega Boulevard & Lennox Boulevard | AM | 0.515 | A | 0.553 | A | 0.038 | No | 0.490 | A | -0.025 | No |
| | | PM | 0.748 | C | 0.751 | C | 0.003 | No | 0.696 | B | -0.052 | No |
| 123 | La Cienega Boulevard & 111th Street | AM | 0.320 | A | 0.309 | A | -0.011 | No | 0.294 | A | -0.026 | No |
| | | PM | 0.374 | A | 0.395 | A | 0.021 | No | 0.397 | A | 0.023 | No |
| 124 | La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Hwy) | AM | 0.511 | A | 0.506 | A | -0.005 | No | 0.465 | A | -0.046 | No |
| | | PM | 0.393 | A | 0.382 | A | -0.011 | No | 0.392 | A | -0.001 | No |
| 125 | La Cienega Boulevard & Imperial Highway | AM | 0.466 | A | 0.498 | A | 0.032 | No | 0.505 | A | 0.039 | No |
| | | PM | 0.834 | D | 0.830 | D | -0.004 | No | 0.829 | D | -0.005 | No |
| 126 | La Cienega Boulevard & West 120th Street | AM | 0.814 | D | 0.784 | C | -0.030 | No | 0.809 | D | -0.005 | No |
| | | PM | 0.962 | E | 0.968 | E | 0.006 | No | 0.968 | E | 0.006 | No |
| 127 | La Cienega Boulevard & El Segundo Boulevard | AM | 0.719 | C | 0.709 | C | -0.010 | No | 0.729 | C | 0.010 | No |
| | | PM | 0.901 | E | 0.908 | E | 0.007 | No | 0.908 | E | 0.007 | No |
| 128 | Hindry Avenue & Rosecrans Avenue | AM | 0.713 | C | 0.709 | C | -0.004 | No | 0.709 | C | -0.004 | No |
| | | PM | 0.794 | C | 0.790 | C | -0.004 | No | 0.790 | C | -0.004 | No |
| 129 | I-405 Northbound Off-Ramp/Ash Avenue & Manchester Avenue | AM | 0.882 | D | 0.873 | D | -0.009 | No | 0.873 | D | -0.009 | No |
| | | PM | 0.845 | D | 0.838 | D | -0.007 | No | 0.833 | D | -0.012 | No |
| 130 | I-405 Northbound Ramps & Century Boulevard | AM | 0.952 | E | 0.971 | E | 0.019 | No | 0.825 | D | -0.127 | No |
| | | PM | 0.826 | D | 0.864 | D | 0.038 | No | 0.728 | C | -0.098 | No |
| 131 | I-405 Northbound Ramps (e/o La Cienega Bl) & Imperial Highway | AM | 0.619 | B | 0.639 | B | 0.020 | No | 0.650 | B | 0.031 | No |
| | | PM | 0.803 | D | 0.779 | C | -0.024 | No | 0.812 | D | 0.009 | No |
| 132 | I-405 Northbound Ramps & El Segundo Boulevard | AM | 0.784 | C | 0.795 | C | 0.011 | No | 0.800 | C | 0.016 | No |
| | | PM | 0.802 | D | 0.807 | D | 0.005 | No | 0.783 | C | -0.019 | No |
| 133 | I-405 Northbound Ramps & Rosecrans Avenue | AM | 0.886 | D | 0.883 | D | -0.003 | No | 0.883 | D | -0.003 | No |
| | | PM | 0.880 | D | 0.878 | D | -0.002 | No | 0.878 | D | -0.002 | No |
| 134 | Inglewood Avenue & Manchester Boulevard | AM | 0.771 | C | 0.772 | C | 0.001 | No | 0.772 | C | 0.001 | No |
| | | PM | 0.850 | D | 0.847 | D | -0.003 | No | 0.847 | D | -0.003 | No |
| 135 | Inglewood Avenue & Arbor Vitae Street | AM | 0.662 | B | 0.670 | B | 0.008 | No | 0.669 | B | 0.007 | No |
| | | PM | 0.763 | C | 0.743 | C | -0.020 | No | 0.742 | C | -0.021 | No |
| 136 | Inglewood Avenue & Century Boulevard | AM | 0.837 | D | 0.859 | D | 0.022 | No | 0.730 | C | -0.107 | No |
| | | PM | 1.000 | E | 1.020 | F | 0.020 | **Yes** | 0.895 | D | -0.105 | No |
| 137 | Inglewood Avenue & Lennox Boulevard | AM | 0.904 | E | 0.902 | E | -0.002 | No | 0.901 | E | -0.003 | No |
| | | PM | 1.023 | F | 1.023 | F | 0.000 | No | 1.000 | E | -0.023 | No |
| 138 | Inglewood Avenue & Imperial Highway | AM | 1.055 | F | 1.057 | F | 0.002 | No | 1.028 | F | -0.027 | No |
| | | PM | 1.144 | F | 1.148 | F | 0.004 | No | 1.130 | F | -0.014 | No |

**TABLE 111 (continued)**
**SUMMARY OF INTERSECTION LEVEL OF SERVICE ANALYSIS - ALTERNATIVE 3: REDUCED PHASE 1 ROADWAY IMPROVEMENTS**

| MAP # | INTERSECTION | PEAK HOUR | FUTURE (2024) WITHOUT PROJECT CONDITIONS | | FUTURE (2024) WITH PHASE 1 PROJECT CONDITIONS - ALTERNATIVE 3 | | | | FUTURE (2024) WITH PHASE 1 PROJECT AND MITIGATION CONDITIONS - ALTERNATIVE 3 | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | V/C OR DELAY | LOS | V/C OR DELAY | LOS | CHANGE IN V/C | SIGNIFICANT IMPACT | V/C OR DELAY | LOS | CHANGE IN V/C | SIGNIFICANT IMPACT |
| 139 | Inglewood Avenue & El Segundo Boulevard | AM | 0.853 | D | 0.865 | D | 0.012 | No | 0.867 | D | 0.014 | No |
| | | PM | 0.991 | E | 0.997 | E | 0.006 | No | 1.000 | E | 0.009 | No |
| 140 | Inglewood Avenue & Rosecrans Avenue | AM | 0.896 | D | 0.895 | D | -0.001 | No | 0.895 | D | -0.001 | No |
| | | PM | 1.086 | F | 1.086 | F | 0.000 | No | 1.086 | F | 0.000 | No |
| 141 | La Brea Avenue/Overhill Drive & Stocker Street | AM | 0.946 | E | 0.944 | E | -0.002 | No | 0.943 | E | -0.003 | No |
| | | PM | 1.095 | F | 1.084 | F | -0.011 | No | 1.082 | F | -0.013 | No |
| 142 | La Brea Avenue & Slauson Avenue | AM | 0.876 | D | 0.874 | D | -0.002 | No | 0.872 | D | -0.004 | No |
| | | PM | 1.013 | F | 1.010 | F | -0.003 | No | 1.007 | F | -0.006 | No |
| 143 | La Brea Avenue & Centinela Avenue | AM | 0.970 | E | 0.970 | E | 0.000 | No | 0.970 | E | 0.000 | No |
| | | PM | 1.023 | F | 1.022 | F | -0.001 | No | 1.022 | F | -0.001 | No |
| 144 | La Brea Avenue & Florence Avenue | AM | 0.876 | D | 0.884 | D | 0.008 | No | 0.881 | D | 0.005 | No |
| | | PM | 1.037 | F | 1.033 | F | -0.004 | No | 1.032 | F | -0.005 | No |
| 145 | La Brea Avenue & Manchester Boulevard [1] | AM | 0.834 | D | 0.836 | D | 0.002 | No | 0.836 | D | 0.002 | No |
| | | PM | 0.866 | D | 0.866 | D | 0.000 | No | 0.866 | D | 0.000 | No |
| 146 | La Brea Avenue & Arbor Vitae Street | AM | 0.597 | A | 0.593 | A | -0.004 | No | 0.591 | A | -0.006 | No |
| | | PM | 0.764 | C | 0.775 | C | 0.011 | No | 0.774 | C | 0.010 | No |
| 147 | La Brea Avenue/Hawthorne Boulevard & Century Boulevard | AM | 0.834 | D | 0.852 | D | 0.018 | No | 0.710 | C | -0.124 | No |
| | | PM | 0.903 | E | 0.893 | D | -0.010 | No | 0.749 | C | -0.154 | No |
| 148 | Hawthorne Boulevard & Lennox Boulevard | AM | 0.772 | C | 0.765 | C | -0.007 | No | 0.764 | C | -0.008 | No |
| | | PM | 0.856 | D | 0.838 | D | -0.018 | No | 0.837 | D | -0.019 | No |
| 149 | Hawthorne Boulevard & I-105 Westbound Ramps/111th Street | AM | 0.890 | D | 0.884 | D | -0.006 | No | 0.883 | D | -0.007 | No |
| | | PM | 1.020 | F | 1.005 | F | -0.015 | No | 1.005 | F | -0.015 | No |
| 150 | Hawthorne Boulevard & Imperial Avenue | AM | 0.812 | D | 0.799 | C | -0.013 | No | 0.782 | C | -0.030 | No |
| | | PM | 0.985 | E | 0.990 | E | 0.005 | No | 0.985 | E | 0.000 | No |
| 151 | Hawthorne Boulevard & 120th Street | AM | 0.645 | B | 0.652 | B | 0.007 | No | 0.651 | B | 0.006 | No |
| | | PM | 0.802 | D | 0.810 | D | 0.008 | No | 0.804 | D | 0.002 | No |
| 152 | Hawthorne Boulevard & El Segundo Boulevard | AM | 0.741 | C | 0.750 | C | 0.009 | No | 0.759 | C | 0.018 | No |
| | | PM | 0.867 | D | 0.871 | D | 0.004 | No | 0.878 | D | 0.011 | No |
| 153 | Hawthorne Boulevard & Rosecrans Avenue | AM | 0.723 | C | 0.723 | C | 0.000 | No | 0.723 | C | 0.000 | No |
| | | PM | 0.892 | D | 0.890 | D | -0.002 | No | 0.890 | D | -0.002 | No |
| 154 | I-105 Eastbound Ramps/Freeman Avenue & Imperial Highway | AM | 0.699 | B | 0.699 | B | 0.000 | No | 0.694 | B | -0.005 | No |
| | | PM | 0.784 | C | 0.746 | C | -0.038 | No | 0.745 | C | -0.039 | No |
| 155 | Prairie Avenue & Manchester Boulevard | AM | 0.955 | E | 0.953 | E | -0.002 | No | 0.952 | E | -0.003 | No |
| | | PM | 1.025 | F | 1.021 | F | -0.004 | No | 1.021 | F | -0.004 | No |
| 156 | Prairie Avenue & Arbor Vitae Street | AM | 0.795 | C | 0.795 | C | 0.000 | No | 0.795 | C | 0.000 | No |
| | | PM | 0.880 | D | 0.882 | D | 0.002 | No | 0.882 | D | 0.002 | No |
| 157 | Prairie Avenue & Century Boulevard | AM | 0.918 | E | 0.917 | E | -0.001 | No | 0.792 | C | -0.126 | No |
| | | PM | 0.969 | E | 0.967 | E | -0.002 | No | 0.867 | D | -0.102 | No |
| 158 | Prairie Avenue & Lennox Boulevard | AM | 0.673 | B | 0.672 | B | -0.001 | No | 0.672 | B | -0.001 | No |
| | | PM | 0.680 | B | 0.680 | B | 0.000 | No | 0.680 | B | 0.000 | No |
| 159 | Prairie Avenue & West 112th Street/I-105 Off-Ramp | AM | 0.772 | C | 0.786 | C | 0.014 | No | 0.786 | C | 0.014 | No |
| | | PM | 0.742 | C | 0.743 | C | 0.001 | No | 0.743 | C | 0.001 | No |
| 160 | Prairie Avenue & Imperial Highway | AM | 1.301 | F | 1.299 | F | -0.002 | No | 1.290 | F | -0.011 | No |
| | | PM | 0.891 | D | 0.891 | D | 0.000 | No | 0.880 | D | -0.011 | No |
| 161 | Prairie Avenue & El Segundo Boulevard | AM | 0.916 | E | 0.916 | E | 0.000 | No | 0.916 | E | 0.000 | No |
| | | PM | 0.948 | E | 0.946 | E | -0.002 | No | 0.951 | E | 0.003 | No |
| 162 | Crenshaw Boulevard & Manchester Avenue [1] | AM | 1.015 | F | 1.012 | F | -0.003 | No | 1.011 | F | -0.004 | No |
| | | PM | 1.110 | F | 1.109 | F | -0.001 | No | 1.109 | F | -0.001 | No |
| 163 | Crenshaw Boulevard & Century Boulevard | AM | 0.923 | E | 0.922 | E | -0.001 | No | 0.822 | D | -0.101 | No |
| | | PM | 1.059 | F | 1.056 | F | -0.003 | No | 0.956 | E | -0.103 | No |
| 164 | Crenshaw Boulevard & Imperial Highway | AM | 0.876 | D | 0.879 | D | 0.003 | No | 0.879 | D | 0.003 | No |
| | | PM | 1.012 | F | 1.016 | F | 0.004 | No | 1.016 | F | 0.004 | No |
| 165 | Western Avenue & Manchester Avenue | AM | 0.841 | D | 0.841 | D | 0.000 | No | 0.840 | D | -0.001 | No |
| | | PM | 0.997 | E | 0.998 | E | 0.001 | No | 0.998 | E | 0.001 | No |
| 166 | Western Avenue & Imperial Highway | AM | 0.895 | D | 0.899 | D | 0.004 | No | 0.899 | D | 0.004 | No |
| | | PM | 0.895 | D | 0.897 | D | 0.002 | No | 0.897 | D | 0.002 | No |
| 167 | I-405 Northbound Ramps & Culver Boulevard | AM | 0.757 | C | 0.757 | C | 0.000 | No | 0.757 | C | 0.000 | No |
| | | PM | 0.698 | B | 0.698 | B | 0.000 | No | 0.698 | B | 0.000 | No |
| 168 | Walgrove Avenue & Washington Boulevard [3] | AM | *** | F | *** | F | 0.001 | No | *** | F | 0.001 | No |
| | | PM | *** | F | *** | F | 0.000 | No | *** | F | 0.000 | No |
| 169 | Washington Boulevard & Washington Place at Wade Street | AM | 0.741 | C | 0.742 | C | 0.001 | No | 0.742 | C | 0.001 | No |
| | | PM | 0.926 | E | 0.926 | E | 0.000 | No | 0.926 | E | 0.000 | No |
| 170 | Inglewood Boulevard & Washington Boulevard | AM | 0.842 | D | 0.842 | D | 0.000 | No | 0.842 | D | 0.000 | No |
| | | PM | 1.050 | F | 1.050 | F | 0.000 | No | 1.050 | F | 0.000 | No |
| 171 | Sawtelle Boulevard & I-405 Southbound Ramp (s/o Washington Bl) | AM | 0.410 | A | 0.412 | A | 0.002 | No | 0.412 | A | 0.002 | No |
| | | PM | 0.505 | A | 0.506 | A | 0.001 | No | 0.506 | A | 0.001 | No |
| 172 | Washington Boulevard & Washington Place at Tilden Avenue | AM | 0.583 | A | 0.583 | A | 0.000 | No | 0.583 | A | 0.000 | No |
| | | PM | 0.640 | B | 0.641 | B | 0.001 | No | 0.641 | B | 0.001 | No |
| 173 | Overland Avenue & Sawtelle Boulevard [4] | AM | 44.8 s | E | 42.8 s | E | 0.000 | No | 42.8 s | E | 0.000 | No |
| | | PM | 58.6 s | F | 58.4 s | F | 0.000 | No | 58.4 s | F | 0.000 | No |
| 174 | Canfield Avenue-Washington Boulevard (Ince Bl) & Culver Boulevard | AM | 0.824 | D | 0.824 | D | 0.000 | No | 0.824 | D | 0.000 | No |
| | | PM | 0.748 | C | 0.748 | C | 0.000 | No | 0.748 | C | 0.000 | No |
| 175 | Ince Boulevard & Washington Boulevard | AM | 0.967 | E | 0.967 | E | 0.000 | No | 0.967 | E | 0.000 | No |
| | | PM | 0.949 | E | 0.949 | E | 0.000 | No | 0.949 | E | 0.000 | No |
| 176 | National Boulevard & Venice Boulevard | AM | 0.885 | D | 0.884 | D | -0.001 | No | 0.884 | D | -0.001 | No |
| | | PM | 1.021 | F | 1.020 | F | -0.001 | No | 1.020 | F | -0.001 | No |
| 177 | National Boulevard & Washington Boulevard | AM | 0.820 | D | 0.820 | D | 0.000 | No | 0.820 | D | 0.000 | No |
| | | PM | 0.966 | E | 0.966 | E | 0.000 | No | 0.966 | E | 0.000 | No |
| 178 | La Cienega Boulevard & Washington Boulevard | AM | 0.926 | E | 0.926 | E | 0.000 | No | 0.926 | E | 0.000 | No |
| | | PM | 1.044 | F | 1.044 | F | 0.000 | No | 1.044 | F | 0.000 | No |
| 179 | Centinela Avenue & Florence Avenue | AM | 0.900 | D | 0.903 | E | 0.003 | No | 0.900 | D | 0.000 | No |
| | | PM | 0.860 | D | 0.859 | D | -0.001 | No | 0.859 | D | -0.001 | No |
| 180 | Prairie Avenue & Florence Avenue | AM | 0.804 | D | 0.802 | D | -0.002 | No | 0.800 | C | -0.004 | No |
| | | PM | 0.886 | D | 0.885 | D | -0.001 | No | 0.884 | D | -0.002 | No |
| 181 | Van Ness Avenue & Manchester Avenue | AM | 0.982 | E | 0.985 | E | 0.003 | No | 0.984 | E | 0.002 | No |
| | | PM | 0.993 | E | 0.992 | E | -0.001 | No | 0.992 | E | -0.001 | No |
| 182 | Van Ness Avenue & Century Boulevard | AM | 0.719 | C | 0.720 | C | 0.001 | No | 0.620 | B | -0.099 | No |
| | | PM | 0.787 | C | 0.773 | C | -0.014 | No | 0.673 | B | -0.114 | No |
| 183 | Van Ness Avenue & Imperial Highway | AM | 0.861 | D | 0.865 | D | 0.004 | No | 0.865 | D | 0.004 | No |
| | | PM | 0.901 | E | 0.899 | D | -0.002 | No | 0.899 | D | -0.002 | No |

[1] Los Angeles County Congestion Management Program (CMP) arterial monitoring location.
[2] Stop-controlled on minor approach under base conditions. Worst-case approach delay (in seconds) is reported in table. Analyzed using CMA methodology to determine change in V/C.
[3] Stop-controlled on minor approach. Worst-case approach delay (in seconds) is reported in table. Analyzed using ICU methodology to determine change in V/C.
[4] All-way stop-controlled intersection. Intersection average vehicle delay (in seconds) is reported in table. Analyzed using ICU methodology to determine change in V/C.
*** - Indicates oversaturated conditions. Delay cannot be determined.

**TABLE 111 (continued)**
**SUMMARY OF INTERSECTION LEVEL OF SERVICE ANALYSIS - ALTERNATIVE 3: REDUCED PHASE 1 ROADWAY IMPROVEMENTS**

| LEVEL OF SERVICE | FUTURE (2024) WITH PHASE 1 PROJECT CONDITIONS - ALTERNATIVE 3 | |
|---|---|---|
| | INTERSECTIONS | |
| | AM PEAK HOUR | PM PEAK HOUR |
| A | 31 | 25 |
| B | 30 | 23 |
| C | 36 | 31 |
| D | 43 | 41 |
| E | 27 | 32 |
| F | 16 | 31 |
| TOTAL | 183 | 183 |
| TOTAL NUMBER OF IMPACTS | 5 | 7 |
| TOTAL INDIVIDUAL INTERSECTION IMPACTS | 9 | |

| LEVEL OF SERVICE | FUTURE (2024) WITH PHASE 1 PROJECT AND MITIGATION CONDITIONS - ALTERNATIVE 3 | |
|---|---|---|
| | INTERSECTIONS | |
| | AM PEAK HOUR | PM PEAK HOUR |
| A | 33 | 25 |
| B | 33 | 27 |
| C | 35 | 31 |
| D | 44 | 44 |
| E | 25 | 28 |
| F | 13 | 28 |
| TOTAL | 183 | 183 |
| TOTAL NUMBER OF IMPACTS | 2 | 2 |
| TOTAL INDIVIDUAL INTERSECTION IMPACTS | 2 | |

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Los Angeles
World Airports