May 6, 2019

Ms. Evelyn Quintanilla
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

RE: LAX Airfield and Terminal Modernization Project
Vic. LA-405/PM 22.217,
LA-01/PM 25.95-28.36
SCH # 2019049020
GTS # LA-2019-02403AL-NOP

Dear Ms. Quintanilla:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. LAWA proposes to implement the LAX Airfield and Terminal Modernization Project as part of LAWA’s continuing commitment to maintain LAX as a world-class airport. The project consists of several elements, including airfield improvements to enhance efficiency and safety within the north airfield, new terminal facilities to upgrade passenger processing capabilities and enhance the customer experience, and an improved system of roadways to better access the Central Terminal Area (CTA) and reduce congestion.

Airfield Improvements (North Airfield): Westerly extension of Taxiway D and reconfiguration of runway exists from the northernmost runway. Remote gates on the western side of the airport would be removed. New Terminal Facilities: Concourse 0 would be an 11-gate concourse (net increase of 9 gates) east of Terminal 1. Terminal 9 would be a 12-gate international/domestic passenger terminal southeast of the Sepulveda Boulevard/Century Boulevard intersection. Concourse 0 and Terminal 9 would replace remote gates eliminated by the proposed Taxiway D extension. Taxiways would be modified to provide aircraft access to these new facilities. Roadway Improvements: New arrival and departure roadways would improve access to and from the CTA and would provide access to the new Terminal 9 facility. Access to Terminal 9 would also be provided by a new Automated People Mover (APM) station and a pedestrian bridge across Sepulveda Boulevard linking Terminals 8 and 9. The project site is located within the northern and eastern portions of LAX, south of Westchester Parkway, east of Aviation Boulevard, north of Imperial Highway, and west of Pershing Drive.
The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. As a reminder, the VMT will be the standard transportation analysis metric in CEQA for land use projects starting July 1, 2020 statewide implementation date. You may reference to The Governor's Office of Planning and Research (OPR) for more information.

http://opr.ca.gov/ceqa/updates/guidelines/

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online at:


A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

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We have the following preliminary comments after reviewing the NOP:

1. The EIR should include a Transportation Impact Study (TIS) to ensure all modes of transportation are served well by planning and development activities. This includes but not limit to reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions, etc.

2. The following advisory should be used for project study and analysis:


3. The scope of Transportation Impact Study should include the following Traffic Analysis Scenarios:
   a) Existing Conditions – Current year traffic volumes and peak hour volume/analysis of effected State highway facilities.
   b) Proposed Project Only – Trip generation, distribution, and assignment in the year of project is anticipated to complete construction.
   c) Cumulative Conditions (Existing Conditions Plus Other Approved and Pending Projects Without Proposed Project) – Trip assignment and peak hour volume/analysis in the year the project is anticipated to complete construction.
   d) Cumulative Conditions Plus Proposed Project (Existing Conditions Plus Other Approved and Pending Projects Plus Proposed Project) – Trip assignment and peak hour volume/analysis in the year the project is anticipated to complete construction.
   e) Cumulative Conditions Plus Proposed Phases (Interim Years) – Trip assignment and peak hour volume/analysis in the years project phases are anticipated to complete constructions.

4. The HCM methodology should be used for analysis on State Highway Systems if the Level of Service (LOS) methodology is still in used. For freeway mainline, weave, merge and diverge segments, the methodologies in Chapter 12, 13, 14 of the HCM 6th edition are limited to under saturated flow conditions. When a freeway facility has oversaturated flows, Chapter 10, Freeway Facilities Core Methodology, is recommended to be used to determine a more precise density for such conditions. It is acknowledged there are limitations of the HCM methodology and thus its recommended to use a traffic simulation model for the analysis.

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5. Potential traffic conflict analysis should include off-ramps, affected intersections (left- and/or right-turn queue), acceleration and deceleration lanes, and weaving areas in the project vicinity. The TIS should include the following potential traffic conflict analysis on state facilities within the study Area (Sepulveda Blvd, Lincoln Blvd, I-405/Century Blvd and I-405/I-105 interchange):
   - Queuing analysis where there is inadequate queue length at intersections, turn lanes, freeway ramps, diverge or ramp terminal intersections.
   - Inadequate weaving distance/deceleration length with increasing traffic volumes.

6. Caltrans requests information regarding the assignment of direct and cumulative trips to state facilities in the project vicinity.

7. The project proponent may use a 95 percentile to obtain queue length.

8. To calculate the baseline condition for total queue length on off-ramps, measure the distance from the intersection to the gore point. Caltrans recommends that any queuing on an off-ramp attributable to the project beyond 85% of this total length be considered a significant impact for direct or cumulative impacts.

9. When an auxiliary lane is present, impacts will be considered significant, either directly or cumulatively, when sufficient traffic volume generated by the project that would create a potential traffic conflict.

10. If Synchro software is used to calculate queue length for the ramp terminal signalized intersection, then actual signal timing must be used, not signal optimization timing.

11. The analysis should use a local truck factor and 25 feet per passenger car.

12. Select Zone analysis should be performed to identify locations anticipated to be assigned 50 or more project trips on I-405, I-105, and SR-1.

13. In the event that the project proponent finds a significant impact to an intersection, an Intersection Control Evaluation (ICE) should be prepared as an initial step of an intersection-improvement project.

14. If an impact is identified, Caltrans recommends consideration of the following potential traffic conflict improvement measures:

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a. Safety sign/Yield Sign, delineation  
b. Pavement markings  
c. ADA ramps, pedestrian sidewalk  
d. Ramp metering  
e. Intersection control  
f. Ramp/lane widening. While ramp or lane widening is a potential improvement measure, this measure should be considered as a last resort after first considering measures (a) through (e) above.  
g. Please note that the above is a non-exclusive list of potential improvement measures. The project proponent should consider additional feasible measures.

15. The project proponent may pay 100% of the direct impact and/or fair-share contribution (i.e., a fee program) with cumulative impacts.

On the April 16, 2019 project introduction meeting, both agencies agree to meet again to discuss and finalize the traffic study scope. Caltrans may provide additional comments after the scoping meeting. Please feel free to contact Mr. Alan Lin at (213) 897-8391 when you are ready for the next meeting and refer to GTS # LA-2019-02403-AL-NOP.

Sincerely,

MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse